

Privacy Policy (External)

March 2026

PURPOSE

RMCG is committed to providing quality services to our clients and this policy outlines our ongoing obligations in respect of how we manage external personal information in accordance with the Privacy Act 1988 (Cth)¹ and the Australian Privacy Principles (APPs)². It affirms our commitment to protecting the privacy of individuals and organisations by outlining our practices in the collection, use, storage, and disclosure of personal information.

This policy also enables RMCG employees to:

- Recognise what information is confidential
- Understand their obligations in relation to protection of confidentiality
- Understand the serious consequences of a failure to observe confidentiality obligations.

APPLICATION

This policy applies to all RMCG staff, contractors, and any third parties engaged by RMCG who may access or handle personal information. The policy is not intended to override the terms of any award, enterprise agreement or contract that applies to an employee.

POLICY

GENERAL

What is personal information?

Personal information is defined under the Privacy Act 1988 as 'information or an opinion about an individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not'

It is information that says who we are, what we do and what we believe. Names, addresses, phone numbers, email addresses, photos, bank account details, tax file numbers, super fund information, drivers licence details and academic records are a few examples.

Personal information can be sensitive in nature, for example, information about a person's health, sexuality, religious beliefs, criminal record, professional or trade union memberships. This kind of personal information is known as sensitive personal information.

What information do we collect?

Some aspects of our work require us to collect information to enable us to advise clients, according to their instructions or brief, on how to effectively achieve required outcomes. That data may include sensitive or confidential information about an individual or organisation.

Examples of personal information we collect include but may not be limited to names, addresses, email addresses and phone numbers.

¹ <https://www.legislation.gov.au/C2004A03712/latest/text>

² <https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference>

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Examples of information about organisations we collect include but may not be limited to size of organisation, number of employees, area (e.g. of farms), spatial data (GIS/GPS), production data, financial data, data about resource use. Information about organisations is, in many cases, covered by individual confidentiality agreements.

This information can be obtained in many ways including via email, telephone, face-to-face meetings, interviews, correspondence, through our website or from third parties.

How do we use the information?

From time to time, projects being undertaken by RMCG, require personal information to be obtained to support analysis and recommendations provided to clients. Reports and advice to clients will generally be confidential to that client, therefore sensitive or personal information will only be disclosed back to the client that provided the data.

Where industry-wide studies are undertaken involving benchmarking or similar research, then data will only be released or published that is either:

- With the permission of the individual or enterprise concerned
- Anonymous, with care to protect against inadvertent identification of an individual
- On an aggregate basis, i.e. across sufficient entities to limit the chance for data to be identified with a specific individual or enterprise.

What we will do

RMCG will collect, use, store, and disclose personal information in accordance with the Australian Privacy Principles. We will only collect personal information necessary for our functions and activities and will take reasonable steps to ensure the information is accurate, up-to-date, and secure.

Personal information will not be disclosed to external parties without consent, unless required or authorised by law. We ensure data security through physical, administrative, and technical safeguards, and we implement staff training to maintain privacy awareness.

Individuals have the right to access and correct their personal information. Any privacy complaints should be directed to RMCG's Privacy Officer and will be handled in line with our complaints process.

SECURITY, STORAGE AND CONTROLS

Use and disclosure of information

RMCG will only use or disclose personal information under the following circumstances:

- For the purpose for which it was collected
- For a related purpose which might reasonably be expect
- Where consent has been given to disclose
- If we are required or permitted to do so by law
- Where we have engaged a contracted service provider or partner to perform legitimate functions on our behalf, such as those outlined in this statement.

How do we keep personal information secure?

When we collect personal information, we will, where appropriate and where possible, explain why we are collecting the information and how we plan to use it.

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RMCG holds personal information in electronic formats and in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. These include secured and controlled business premises and IT networks. The security of data and information is part of our formal Quality Management System.

When personal information is no longer required for the purpose for which it was obtained, we will take reasonable steps to file it securely, and, if requested, return the information to the individual/organisation who originally supplied it.

What controls do we use to ensure privacy?

RMCG has the following arrangements in place to meet best practice in privacy controls:

- We will only collect personal/organisational information that is needed for our work
- When we collect personal information from individuals, we will notify them of our privacy policy when requested (or it is accessible via our website)
- We will only use personal information for the primary purpose for which it was originally collected, unless we have permission from the individual for any other use
- We will maintain effective security arrangements to protect personal information
- We will only disclose that information with the permission of the individual / organisational to whom it refers.

EMPLOYEE OBLIGATIONS

Employee obligations

All employees are under a legal duty to preserve the confidentiality of information about individuals and/or organisations external to RMCG provided for work related purposes, and information that belongs to their employer. These legal duties are contained in their contract of employment and are also imposed by the operation of the law.

All employees are to only use and disclose of confidential information so far as it is necessary for the proper performance of their duties and to do everything reasonable to ensure that confidential information is not disclosed in an unauthorised way to any third party or used to obtain a personal benefit.

Employees should avoid making unnecessary copies of information and at the conclusion of an employee's employment, any copies of confidential information in any form must be returned or destroyed. Where an employee is unsure about how to handle confidential information, clarification must be sought from RMCG's Privacy Officer.

Breach of obligations of confidentiality

RMCG views a breach of confidentiality extremely seriously. Employees who breach obligations of confidentiality, undermine the trust that RMCG can have that they will perform their duties properly and in RMCG's best interests.

In many cases, a breach of confidentiality will constitute grounds for immediate termination of employment. At RMCG's discretion, other less serious disciplinary action may be taken.

It is also possible RMCG's interests may be damaged by the disclosure of confidential information that legal action against an employee is justified.

Confidentiality obligations continue post the period of employment with RMCG as outlined in the employee's contract of employment.

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Complaints

Get touch with RMCG's Privacy Officer if you believe that confidential personal information that we hold has been collected, used or disclosed in a way that breaches this statement or our Privacy Policy. We want to ensure that we meet best practice in the way we operate.

Any complaint or enquiry will be dealt with by the Privacy Officer. The issues raised will be assessed and responded to, normally within five working days.

If you believe the response is unsatisfactory, then your concern and our response will be reviewed by one of the Directors of RMCG, selected as independent from the work-related to the complaint. We will respond to you with the outcome of that review within five working days of receiving your further complaint.

LEGISLATION

To the extent that it applies to our activities, RMCG is subject to the requirements of the following legislation:

- Privacy Act 1988 (Cth)³
- Australian Privacy Principles (APPs)⁴
- Privacy and Data Protection Act 2014 (Vic)⁵
- Notifiable Data Breaches (NDB) scheme⁶
- Applicable State and Territory privacy laws
- Fair Work Act 2009⁷ (in relation to employee records exemption)

We are committed to protecting your privacy and processing your personal information fairly and lawfully in compliance with the Privacy Laws as applicable.

POLICY REVIEW

RMCG may make changes to this policy from time to time to improve the effectiveness of its operation.

RMCG CONTACT

For further information, contact:

- Mandy McIntosh, Operations Manager – E: mandym@rmcg.com.au, M: 0438 532 110

³ <https://www.legislation.gov.au/C2004A03712/latest/text>

⁴ <https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference>

⁵ <https://www.legislation.vic.gov.au/in-force/acts/privacy-and-data-protection-act-2014/032>

⁶ <https://www.oaic.gov.au/privacy/notifiable-data-breaches/about-the-notifiable-data-breaches-scheme>

⁷ <https://www.legislation.gov.au/C2009A00028/latest/text>

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Appendix 1: Australian Privacy Principles (APPs)



APP 01 Open and transparent management of personal information

Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.

APP 02 Anonymity and pseudonymity

Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.

APP 03 Collection of solicited personal information

Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.

APP 04 Dealing with unsolicited personal information

Outlines how APP entities must deal with unsolicited personal information.

APP 05 Notification of the collection of personal information

Outlines when and in what circumstances an APP entity that collects personal information must notify an individual of certain matters.

APP 06 Use or disclosure of personal information

Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.

APP 07 Direct marketing

An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.

APP 08 Cross-border disclosure of personal information

Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.

APP 09 Adoption, use or disclosure of government related identifiers

Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.

APP 10 Quality of personal information

An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

APP 11 Security of personal information

An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.

APP 12 Access to personal information

Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.

APP 13 Correction of personal information

Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.

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