



# Cornerstone Web Solutions Pty Ltd

## Privacy Policy

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## Privacy Compliance:

Cornerstone Web respects your privacy and is committed to safeguarding it across all interactions that you have with our business.

Cornerstone Web Solutions Pty Ltd complies with the following Australian Legislation:

- *Privacy Act 1988 (Cth)*
- *Telecommunications (Interception and Access) Act 1979 (Cth)*
- *Telecommunications (Interception and Access) Amendment (Data Retention) Act 2015 (Cth)*

## Who is responsible for Privacy and Privacy Management at CWS?

Respect for your privacy is part of our corporate culture at Cornerstone Web. We recognise the trust that our Customers and visitors place with us as an IT Service Provider and we take this responsibility very seriously.

All Staff Members sign a Confidentiality Agreement with Cornerstone Web as one of their conditions of their employment. This Confidentiality Agreement restricts the access, use and disclosure of any information under the care or control of Cornerstone Web to which the employee may have access. Under this Agreement, these obligations extend indefinitely into the future.

Information security is a pillar of our operating methodology, and data security is considered and regularly evaluated for each product and service that we provide, as well as for our organisation as a whole.

Day-to-day oversight of our Privacy obligations is the role of our Privacy Officer.

The Privacy Officer's responsibilities include:

- Ensuring that privacy implications are considered in all aspects of our business
- Regular evaluation of staff, system and procedural compliance with our Privacy Policy
- Privacy induction of new staff members
- Regular ongoing training of our staff as a whole
- Coordinating the response to any data breach as part of our wider Crisis Management Plan

The Privacy Officer is available to discuss any concerns, questions, feedback or suggestions about privacy that our customers, suppliers and staff may have.

You may contact our Privacy Officer using the details provided at the end of this document in the section entitled "**Contacting us about Privacy matters**".

Overall responsibility for Corporate Privacy is vested with the Managing Director of Cornerstone Web.

## Personal Information and Sensitive Information

This document deals with our handling of your Privacy specifically in relation to your Personal Information.

“Personal Information” is defined by the *Privacy Act 1988 (Cth)* as “information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable”. Common examples are an individual’s name, signature, address, telephone number, date of birth, medical records, credit card and bank account details and commentary or opinion about a person.

“Sensitive Information” is a subset of Personal Information and relates to information about health, racial or ethnic origin, political opinions, association memberships, religious beliefs, sexual orientation, criminal history, genetic and/or biometric information. Cornerstone Web does not collect Sensitive Information.

### Why do we collect Personal Information?

We only collect Personal Information where this information is necessary for us to perform the activities and functions of our business. These activities and functions are primarily to supply our customers with the products and services that they have requested from us, including the ongoing management of these services such as:

- Product sales and support
- Billing, account and credit management servicing
- Renewal, maintenance and system notices
- Other functions relevant to the products and services we supply

Secondary activities and functions related to these include, but are not limited to:

- Business planning
- Product improvement and development
- Business and service updates
- Promotion of new and existing products and services

### How and when do we collect Personal Information?

We do not collect Personal Information secretly or in an underhanded way.

We collect Personal Information when it is actively provided to us (Active Personal Information), when it is provided to us in association with an automated process (Automated Personal Information), and from a mix of these.

Active Personal Information collection occurs when someone voluntarily provides their information to us, including, but not limited to, when a person:

- Contacts us by telephone, SMS, email or postal services
- Speaks with us face-to-face
- Completes a form (or any other submission) on our website
- Subscribes to a product or service that we provide

A person may choose not to submit their details to us, recognising that we may not be able to respond to them or provide them with their requested product or service if they fail to do so.

Collection of Automated Personal Information occurs when a person (or external service being used on behalf of that person) interacts with one or more of our products or services at an automated level. Such interactions include, but are not limited to:

- The process of authentication into a system provided by us
- Any transactions within such a system
- The delivery of email

## Use of Cookies on our websites

Certain functionalities on our websites require the use of Cookies.

Cookies (also known as browser cookies, web cookies, HTTP cookies and Internet cookies) are small pieces of information that are sent from a website and stored for a web browser on your local device.

Our websites use Cookies for the purposes of user authentication (checking to see whether you are currently logged in to a password-protected portal), for customising your individual experience of our websites and to assist in the collection of anonymous website usage information such as through Google Analytics.

We do not use Cookies to store Personal Information.

You always have the option to selectively block or disable Cookies in your browser; however doing this may limit some functionality on our websites.

## What Personal Information do we collect?

Active Personal Information that we collect may include, but is not limited to, your full name, business address, mailing addresses, phone number, email address, business name, ABN, facsimile number and other relevant additional details. Depending on your payment method, we may also collect payment details such as your credit card details. If you contact us via the Internet, details of your Internet connection and/or email delivery path may be collected.

Automated Personal Information that we collect may include, but is not limited to, details of the type of service being used, any commands given to that service, your username, Internet connection details, transaction timestamps, and additionally, in the case of email, details of the email sender, recipients, delivery path and other related information.

We do not collect Sensitive Information as defined in the Privacy Act.

## What other information do we collect?

We may collect non-Personal Information as visitors interact with our websites. Non-Personal Information may include technical details about the browser, computer and Internet connection being used to connect to our websites.

We use website usage monitoring services (such as Google Analytics) to collect non-Personal Information.

## To whom do we disclose Personal Information?

We will never disclose Personal Information to any other party, except in the following circumstances:

- You agree in writing to the disclosure
- Where we are required by Law to make a disclosure
- In situations where you would reasonably expect us to make a disclosure
- Where we provide you with a product or service from a Third Party Supplier of CWS
- As part of the domain name registration process

### As required by Law:

In certain circumstances, Cornerstone Web may be required by law to disclose Personal Information to a defined list of Australian law enforcement and security agencies, or in response to a Court or Tribunal Order.

### Third Party Suppliers of Cornerstone Web:

We may supply Personal Information to Third Party Suppliers in order for them to provide a product or service to you on our behalf. These products and services include, but are not limited to:

- Domain name registration
- Email filtering
- Email marketing
- SSL Certificate registration
- Website design and other graphic design services
- Payment solutions

We provide the least possible amount of Personal Information that is required to establish and operate such products or services.

### As part of the domain name registration process:

Personal Information provided for the purpose of domain name registration may be placed on a publicly accessible database known as the WHOIS database. The requirement to make the personal details of domain license holders publicly available is one that has been adopted by the domain name industry as a whole; However this requirement to make such Personal Information publicly available means that Cornerstone Web will not be able to control how this information will be subsequently used.

If you wish to view the details recorded against your domain name registration, please visit:

- <https://www.whois.net> (for global top level domains such as .com, .net etc.)
- <http://whois.ausregistry.net.au> (for Australian domain names)
- The relevant domain registry for other country-based domain names

## Overseas disclosure of Personal Information

Our Third Party Suppliers may include organisations which are based outside of Australia and/or have subsidiary operations overseas. Our relationships with Third Party Suppliers are governed by the individual Terms and Conditions for these services to which we subscribe and these may differ from Cornerstone Web's Terms and Conditions of Trade. As part of our initial engagement of Third Party Suppliers and regularly thereafter, we check that these suppliers have Privacy and Confidentiality provisions which are similar to the obligations required under Australian Privacy Law.

Personal Information may be recorded using Amazon Web Services data storage services in accordance with our approval to do so by the Attorney General's Department. This data is stored with Amazon Web Services in both Australian and overseas data centres. For details on the security of Amazon Web Services, please visit <https://aws.amazon.com/security>

Non-Personal website usage information we collect using services such as Google Analytics may be stored overseas.

## How long do we keep Personal Information?

We keep Personal Information for the shortest possible duration.

The duration of Personal Information retention depends on the duration of which a product or service is maintained with us, together with the Legislation relating to the type of Personal Information being retained. For example, Data Retention Legislation requires us to retain a particular set of telecommunications data, including some Personal Information, for at least two years after a telecommunications event, while other Personal Information (such as records that are retained for the Australian Taxation Office) must be kept for a minimum of five-to-seven years.

For more information about Telecommunication Data Retention, please visit <https://ag.gov.au/dataretention>

## How do we store and protect Personal Information?

The security of your Personal Information is of paramount importance to Cornerstone Web. As such, we use a range of technologies, policies and procedures to help ensure that your information is collected, stored and accessed securely. Access to Personal Information within Cornerstone Web is restricted to authorised staff members with a legitimate reason for doing so.

Credit card information is stored in a PCI DSS-compliant manner with SecurePay, a division of Australia Post. Credit card payment processing is provided through the Commonwealth Bank of Australia via SecurePay.

We regularly monitor and address security risks and threats that may be relevant to our Privacy responsibilities, as well as to our business as a whole.

## How do we destroy Personal Information?

When Personal Information is no longer required to be retained, we permanently and irreversibly destroy it using one or more of a variety of methods, including, but not limited to:

- De-identification of Personal Information
- Permanent data deletion methods
- Destruction of physical storage media
- Enterprise-grade security shredding services

## Updating and correcting your Personal Information

We strive to ensure that Personal Information is complete, accurate, relevant, up-to-date, and not misleading. At regular intervals and of our own volition, Cornerstone Web will take reasonable steps to review and correct the Personal Information that we have recorded.

Personal Information is dynamic, however, and from time to time, it may be necessary for you to update the Personal Information that relates to you.

To request access to the Personal Information that we hold about you or to make changes to your Personal Information, please contact us using the details provided below.

## Making a Complaint about our handling of your Personal Information

To make a complaint about any matter relating to our handling of your Personal Information, please contact us using the details provided below. We will acknowledge and thoroughly investigate each complaint received. We will inform you of the outcome of our investigation within 30 days of our receiving your complaint.

## Notice of changes to our Privacy Policy

Cornerstone Web may make changes to this Privacy Policy from time to time without notice to you. We will publish the current version of the Policy on our website at [www.cornerstoneweb.com.au/privacy](http://www.cornerstoneweb.com.au/privacy). Please check this URL from time to time to review any changes that we have made to our Privacy Policy.

## Contacting us about Privacy matters

To provide feedback, suggestions or any other communication related to a Privacy matter, please contact us:

- by email via [privacy@cornerstoneweb.com.au](mailto:privacy@cornerstoneweb.com.au)
- by telephone on +61 (0)2 8091 2489