

# Dyadic Consultancy's Privacy Policy

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Dyadic Consultancy's mission to enhance Australia's small business sovereign capability is rooted in the importance we place on establishing trust with our customers, partners, and the community globally. To earn and maintain that trust, we commit to communicating transparently, providing security, and protecting the privacy of data on our systems (**APP 1**).

We keep your personal information personal and private. We will not sell or rent your personal information. We will only share or otherwise disclose your personal information as necessary to provide our Services or as otherwise described in this Policy, except in cases where we first provide you with notice and the opportunity to consent.

## POLICY APPLICATION

This Policy applies to Dyadic Consultancy's collection, use, and disclosure of the personal information of the following categories of data subjects:

- **Attendees:** Those who visit our offices or provide their information to Dyadic Consultancy or Dyadic Consultancy's representatives when they attend or register to attend Dyadic Consultancy-sponsored events or other events at which Dyadic Consultancy (and/or its representatives) participate, as well as those who participate in Dyadic Consultancy's studies such as user experience research.
- **Image and voice:** When you participate in a Dyadic Consultancy-sponsored event, we may ask for your permission to record your voice and/or image during your participation in the event.
- **Website Visitors:** Those who visit our websites, including those who may opt to provide an email address or other contact information to receive communications from Dyadic Consultancy, fill out a survey, or provide feedback. For this Policy, "Websites" refer collectively to [www.dyadic.com.au](http://www.dyadic.com.au) as well as any other websites Dyadic Consultancy operates on its own behalf and that link to this Policy. For clarity, "Websites" does not include any sites owned or operated by our customers.
- **Log files:** Just as when you visit and interact with most websites and services delivered via the Internet, when you visit our website, we gather certain information and store it in log files. This information may include but is not limited to Internet Protocol (IP) addresses, system configuration information, URLs of referring pages, and locale and language preferences.
- **Cookies and other tracking technologies:** We may use cookies and other information-gathering technologies for a variety of purposes, such as providing us with information about how you interact with our websites and assisting us in our marketing efforts. Note that if you disable cookies entirely, Dyadic Consultancy's Websites may not function properly. We may also use cookies and similar technologies to provide you with advertising on third-party sites based on your browsing activities and interests. In addition to exercising cookie choices through our "Cookie Preferences" or "Your Privacy Choices" links, if you do not want to have cookies and similar technologies used to serve you interest-based ads, you may opt-out by clicking the relevant links.
- **Customers:** Individuals or entities who enter into a subscription agreement with Dyadic Consultancy (or its authorised partner) and to whom Dyadic Consultancy provides Services under such agreement. For purposes of this Policy, "Services" shall refer to all of the solutions offered, marketed, or sold by Dyadic Consultancy or its authorised partners that are designed to increase the [performance, services, products, processes, security, and availability of properties, applications, devices, and networks, along with any software, software development kits, and application programming interfaces ("APIs")] made available in connection with the foregoing.

- **Employees:** We collect information about our employees that is necessary for their employment. This may include contact details, financial information for payroll, police checks, health information and other relevant personal information. We take steps to ensure employees are informed of the purpose of collection and obtain consent where appropriate. Employee information is only accessed by authorised personnel and protected from unauthorised access.
- **Job Applicants:** If an individual applies for a position with Dyadic Consultancy, we will collect the information necessary to assess their suitability for employment. This may include CV, contact details, professional experience, and qualifications. Unsuccessful applicant information is only retained as long as necessary.

This Policy also does not apply to our customers' domains, websites, APIs, applications, and networks, which may have their own terms and privacy policies. Our customers are solely responsible for establishing policies for and ensuring compliance with all applicable laws and regulations.

Dyadic Consultancy's Websites and Services are not intended for, nor designed to attract, individuals under the age of eighteen. Dyadic Consultancy does not knowingly collect or share personal information from any person under the age of eighteen. To the extent we become aware that we have the personal information of a person under the age of eighteen, we will assess then as required, delete that information.

## Anonymity and Pseudonymity

We allow clients to provide their personal information anonymously **APP 2** or using a pseudonym where it is lawful and practical to do so. Examples include:

- Phone.
- Email.
- The 'contact us form' on our website.
- In person, and in writing.

## Collection of Personal Information

In collecting personal information, Dyadic Consultancy complies with the Australian Privacy Principles in the Privacy Act 1988 (Cth). We only collect personal information that is reasonably necessary for our business activities and functions **APP 3**. The types of personal information we collect include:

- Contact details such as name, address, email, and phone numbers.
- Financial and billing information.
- Government identifiers where required.
- Technical data about the use of our services.
- Any other information necessary for delivering our services.
- Socio-demographic information.
- Interaction information.
- Digital information
- Publicly available information.

We collect personal information by lawful and fair means, and where possible, directly from the individual. We generally collect personal information directly from Attendees, Website Visitors, Customers, and Users when they:

- Visit our offices.
- Register for or attend our events.
- Visit our websites.
- Purchase or subscribe to our services.
- Provide information to receive communications from us.

At or before the time of collection, we take reasonable steps to ensure individuals are aware of matters required under **APP 5** of the Privacy Act, including our identity and contact details, the purpose of collection, consequences if information is not provided, disclosure practices and access information.

### **Information from Third-Party Services**

We may combine the information we collect as described above with personal information we obtain from third parties. For example, we may combine information entered on a Dyadic Consultancy sales submission form with information we receive from a third-party sales intelligence platform vendor to enhance our ability to market our Services to Customers or potential Customers.

### **DATA AGGREGATION**

Dyadic Consultancy may aggregate data we acquire about our Customers, Administrators, and End Users. For example, we may assemble data to compile web traffic reports and statistics. Non-personally identifiable, aggregated data may be shared with third parties.

### **Unsolicited Personal Information**

If we receive unsolicited personal information that is not reasonably necessary for our functions, we will destroy or de-identify it as soon as practicable, provided it is lawful and reasonable to do so **APP 4**.

### **Notification of the Collection of Personal Information**

When collecting personal information, Dyadic Consultancy takes reasonable steps to notify individuals, or ensure they are aware of the following:

- Our identity and contact details.
- The purposes for which we are collecting the information.
- The types of third parties we may disclose it to.
- That our privacy policy contains information about access and correction.
- Whether we are likely to disclose the information overseas and if so, which countries.
- The main consequences if the personal information is not collected.

This notification typically occurs through our privacy collection notice **APP 5**.

### **Use and Disclosure of Personal Information**

Dyadic Consultancy only uses and discloses personal information to carry out our business activities and functions, or for a related purpose that would reasonably be expected **APP 6**. This may include:

- Providing our products and services.
- Managing our relationship with customers.
- Marketing and promoting our services.
- Allowing third-party contractors to perform services on our behalf.
- Any other reasonably expected related purpose.

We do not use or disclose personal information for unrelated secondary purposes unless an exception applies under the Privacy Act.

### **INFORMATION SHARING**

We do not permit our Service Providers to sell any personal information we share with them or to use any personal information we share with them for their marketing purposes or for any purpose other than in connection with the services they provide to us.

In addition to sharing with Service Providers as described above, we also may share your information with others in the following circumstances:

In the event of a merger, sale, change in control, or reorganisation of all or part of our business.  
When we are required to disclose personal information to respond to subpoenas, court orders, or legal processes, or to establish or exercise our legal rights or defend against legal claims.  
Where we have a good-faith belief sharing is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our Website Terms of Use, Self-Serve Subscription Agreement, and/or Enterprise Subscription Terms of Service; or as otherwise required to comply with our legal obligations; or  
As you may otherwise consent from time to time.

## Direct Marketing

Dyadic Consultancy complies with **APP 7** when using personal information for the purpose of direct marketing. We may only use personal information for direct marketing if:

We collected the information from the individual.  
It is reasonable in the circumstances to expect that we may use it for direct marketing purposes.  
We provide a simple means by which the individual can opt out of direct marketing.

Individuals may opt out of receiving direct marketing communications by:

Contacting us via phone or email.  
Using the unsubscribe link in emails.

## Cross-Border Disclosure of Personal Information

Dyadic Consultancy may disclose personal information to third-party service providers located overseas **APP 8**. We take reasonable steps to ensure overseas recipients comply with the Australian Privacy Principles, such as:

Entering data transfer agreements.  
Conducting due diligence on the recipient's privacy practices.  
Stipulating Australian Privacy Principles protections in contracts.

The countries in which we may disclose personal information to include:

United States.  
United Kingdom.  
European Union.

## Adoption, Use or Disclosure of Government Related Identifiers

Dyadic Consultancy does not adopt government related identifiers of an individual as our own identifier unless required or authorised by law. We only use and disclose government related identifiers where reasonably necessary to verify an individual's identity or as authorised by Australian law **APP 9**.

## Quality Of Personal Information

Dyadic Consultancy takes reasonable steps to ensure the personal information we collect is accurate, up-to-date, complete, and relevant. This may include contacting individuals to verify or update their details.

Individuals may also request for their personal information to be corrected or updated at any time by contacting us.

## **Security of personal information**

Dyadic Consultancy takes reasonable steps to protect personal information from misuse, interference, and loss, as well as unauthorised access, modification, or disclosure. Our security measures include:

- Encryption of data in transit and at rest.
- Access controls over our systems.
- Network firewalls and intrusion detection systems.
- Secure storage of data.
- Staff training on information handling practices.

We also have a data breach response plan in place to swiftly deal with any eligible data breaches.

## **DATA RETENTION**

We store your personal information for a period that is consistent with the business purposes or as long as needed to fulfil and comply with legal obligations. The criteria we used to determine how long we store your personal information will vary depending on several factors. We typically consider the following when determining data retention:

- The purpose for collecting the personal information in the first place. For example, if you have an active account with us, we need to keep your contact information during the entirety of that time to support you or contact you regarding your account.
- The volume, nature, and sensitivity of the personal information we are processing.
- The potential risk of harm from unauthorised use or disclosure of personal information.
- Whether we can achieve the purposes of processing with less data or through other means
- Legal requirements that may apply to the data, such as applicable statutes of limitation or contractual obligations.

When the data retention period expires for a given type of data, we will delete or destroy it. If, for technical reasons, we are unable to do so, we will implement appropriate security measures to prevent any further use of such data.

## **Access to Personal Information**

Individuals may request access to the personal information we hold about them at any time by contacting us. We require identity verification and will respond within a reasonable period.

For any request, we will need to verify a requestor is inquiring about their own information before we can assist. Where a request may implicate the personal information of another individual, we must balance the request against the risk of violating another person's privacy rights. We will comply with requests to the extent required by applicable law.

## **Correction of Personal Information**

Individuals also have the right to request corrections to any inaccurate, incomplete, out-of-date, or irrelevant personal information.

If we deny access or refuse correction, we will provide written reasons within a reasonable period.

## Complaints and Breaches

Individuals can make a complaint to Dyadic Consultancy about a potential breach of the Australian Privacy Principles or the Privacy Act 1988 (Cth). Complaints must be in writing and directed to our Privacy Officer using the contact details below.

We will respond to complaints within 30 days. If you are not satisfied with our response, you may refer the complaint to the Office of the Australian Information Commissioner [oaic.gov.au](http://oaic.gov.au).

In the event of a data breach that is likely to cause serious harm, we will notify the Office of the Australian Information Commissioner and affected individuals by the Notifiable Data Breach Scheme under the Privacy Act.

## Contact Details

Privacy Officer  
Dyadic Consultancy  
PO Box 194  
Thuringowa Central  
QLD 4817

1300 392 342

[info@dyadic.com.au](mailto:info@dyadic.com.au)

## Further Information

### Changes to this Privacy Policy

This privacy policy is subject to change from time to time. The current version will be posted on our website.

### Incorporation of Australian Privacy Principles

This privacy policy has been developed to be compliant with the Australian Privacy Principles in the Privacy Act 1988 (Cth) and incorporates guidance from the Office of the Australian Information Commissioner.

## ESSENTIAL EIGHT STEPS FOR DATA SECURITY

Dyadic Consultancy implements the Australian Cyber Security Centre's Essential Eight strategies to mitigate cyber security incidents. This includes:

1. Application whitelisting - Only approved applications can run and all unapproved applications are blocked.
2. Patch applications - All applications and operating systems are regularly patched and kept up-to-date.
3. Configure Microsoft Office macro settings - Microsoft Office applications are configured to block macros and only allow trusted sources.
4. User application hardening - Applications are configured with the strongest security settings possible.
5. Restrict administrative privileges - Administrative privileges are restricted to only those accounts that require them.

6. Patch operating systems - Operating systems are regularly patched and kept up-to-date.
7. Multi-factor authentication - Multi-factor authentication is required for all remote access and VPN connections.
8. Daily backups - Daily backups of important data are performed and tested regularly.

## **INFORMATION SECURITY POLICIES AND PROCEDURES**

Dyadic Consultancy maintains comprehensive policies and procedures governing information security and privacy. These are based on ISO 27001 standards and industry best practices. Key policies and procedures include:

Information Security Policy - Overarching policy governing our approach to information security.  
Incident Response Plan - Response plan for security incidents like malware, hacking attempts or data breaches.

Third-Party Management - Security reviews and due diligence for service providers.

Physical Security Policy - Protection of facilities and equipment from unauthorised access.

Business Continuity Procedures - Planning and procedures for availability of services.

Acceptable Use Policy - Guidelines for responsible use of systems by employees.

Training and Awareness Program - Ongoing training on security best practices for staff.

These policies and procedures are reviewed annually and updated as needed to comply with evolving privacy laws, regulations, and industry standards.

## **COMPLIANCE WITH PRIVACY LAWS**

Dyadic Consultancy complies with the following key Australian privacy laws and regulations:

Privacy Act 1988 (Cth) and Australian Privacy Principles - Govern the handling of personal information by Australian government agencies and private sector organisations. Dyadic Consultancy follows the APPs in our data practices.

Privacy Amendment (Notifiable Data Breaches) Act 2017 - Requires notification to the OAIC and affected individuals in the event of an eligible data breach.

Spam Act 2003 (Cth) - Prohibits sending unsolicited commercial electronic messages without consent.

Do Not Call Register Act 2006 (Cth) - Registers individuals who do not wish to receive telemarketing calls.

Our privacy policy and procedures are designed to meet or exceed the requirements of these laws and regulations. We regularly review new legislation to ensure continued compliance.

## **PRIVACY TRAINING**

Dyadic Consultancy provides regular privacy and information security training to all employees. Training includes:

Introduction to privacy laws, regulations, and standards.

Understanding personal information and data protection principles.

Secure handling of personal and confidential data.

Privacy incident response and data breach notification.

Privacy rights of individuals and handling requests.

Operational security controls to protect personal data.

Protecting personal information when working remotely.

Special obligations when transferring data overseas.

Privacy considerations when developing applications.

Higher risk data and enhanced security measures.

Recognizing and avoiding phishing attacks.

Training is provided at onboarding and repeated annually. Additional targeted training is provided as needed for higher-risk roles like software developers. Completion records are maintained and tracked.

## **PRIVACY RISK ASSESSMENTS**

Dyadic Consultancy conducts in-depth privacy impact assessments when:

- Developing new products or services that handle personal data.
- Making significant changes to existing personal data processing activities.
- Implementing new technologies that may impact privacy.
- Personal data is to be used for new purposes.

Assessments identify privacy risks and evaluate protections and controls to mitigate the risks. Remediation actions are documented and tracked through completion.

Privacy risk assessments include:

- Description of the data processing activity.
- Types of personal data collected and processing activities.
- Assessment of compliance with privacy laws and regulations.
- Identification of risks to individuals' privacy rights and freedoms.
- Evaluation of existing and additional privacy controls needed.
- Documentation of required actions to address risks.
- Review of residual risks and determination of acceptance.

High-risk processing activities may be subject to additional controls like encryption, access restrictions, or limitations on data retention periods.

## **THIRD-PARTY PRIVACY ASSESSMENTS**

Dyadic Consultancy conducts privacy assessments of third-party providers who may process personal data on our behalf. Based on data sensitivity and the nature of processing, third-party privacy assessments include:

- Privacy questionnaire evaluating the provider's data security controls.
- Review of the provider's privacy policy and procedures.
- Assessment of the provider's compliance with relevant privacy laws.
- Privacy-related roles, responsibilities, and training.
- Identification of sub-contractors who may process data.
- Physical, technical, and administrative safeguards.
- Data breach incident response plan.
- Data retention periods and destruction procedures.
- Privacy certifications and audit reports.
- Contractual commitments to protect personal data.

Based on risk, assessments may include interviews with key staff and requests for evidence of controls. Higher-risk providers may require full security audits and penetration testing.