

# Privacy Policy

## 1. What is considered Personal Information?

Nous Group Pty Ltd ABN 66 086 210 344 and its related bodies corporate, including Nous Data Insights Group Pty Ltd ABN 15 613 111 443 and its related bodies corporate (referred to as **Nous, we, us** or **our**) respect your right to privacy and are committed to safeguarding the privacy of individuals, including our suppliers, customers and website visitors, and to the protection of personal information that relates to them in accordance with the laws of the jurisdictions in question, including, as applicable:

- **Australia:** Australian Privacy Principles (**APPs**) as set out in the *Privacy Act 1988* (Cth) (**AU Privacy Act**);
- **Canada:** the Personal Information Protection and Electronic Documents Act (**PIPEDA**), or any substantially similar law of a Province (collectively, **Canadian Privacy Law**);
- **European Union:** the “Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016”, known as the EU General Data Protection Regulation (**GDPR**);
- **New Zealand:** New Zealand Information Privacy Principles (**NZIPPs**) set out in the Privacy Act 2020 (New Zealand) (**NZ Privacy Act**); and
- **United Kingdom:** the *Data Protection Act 2018* and the GDPR as it applies under UK law (**UK GDPR**).

“**Privacy Law**” in this Privacy Policy means all applicable privacy laws, regulations and codes relating to privacy and personal information and includes, but is not limited to, the AU Privacy Act, the Canadian Privacy Law, the GDPR, the NZ Privacy Act, and/or the UK GDPR.

This Privacy Policy describes the way we collect, use, and disclose personal information (as defined below) that is covered by the applicable Privacy Law. It is not intended to cover categories of information that are not covered by the applicable Privacy Law. If you wish to make any inquiries regarding this Privacy Policy, you should contact us in any of the ways specified in clause 11.

References in this Privacy Policy to “**you**” are references to you as an individual and/or as a company, organisation or trust as and if applicable under the relevant Privacy Law.

We may, from time to time, review and update this Privacy Policy including to consider new laws, regulations and technology. All personal information held by us will be governed by our most recent Privacy Policy, posted on our website [www.nousgroup.com](http://www.nousgroup.com), (**Website**). Our most recent Privacy Policy will apply to our collection, use and disclosure of Personal Information. At any time, you may withdraw consent to the continued use of your Personal Information, subject to legal and contractual restrictions.

**“Personal Information”** is information or an opinion by or about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether recorded in a material form or not. Personal Information does not include information that is aggregated or anonymized.

**“Sensitive Information”**, depending on the applicable Privacy Law, would include Personal Information about an individual that includes health information, genetic information, biometric information or templates, or personal information that is also information or an opinion about an individual’s race or ethnicity, their religious, political or philosophical beliefs, opinions or affiliations, their sexual orientation or criminal record.

## 2. Why do we collect Personal Information?

### 2.1 Why do we collect your information?

We collect Personal Information from clients and customers, employees, contractors, survey participants and other individuals that is reasonably necessary for one or more of our functions or activities, including: to deliver management consultancy services to our clients (in some cases with support from third party providers), to provide insights into the industries in which we work, to market and sell our products and services, to improve our products, our marketing and to better understand your needs, to provide you with information and updates, to make you aware of new and additional services and opportunities available to you, and to conduct employee related activities. We will only collect Personal Information that is adequate, relevant, and limited to what is necessary for the purposes set out in this Privacy Policy.

### 2.2 How we contact you and how you may deal with us

Nous may contact you using a variety of means including, but not limited to, telephone, email, SMS and post.

You have the option to deal with us anonymously or by using a pseudonym. However, you acknowledge that where this is impractical or where the law or a court order provides otherwise, we are not required to provide these options to you.

If you choose not to provide your Personal Information to us, we may not be able to undertake certain activities for you (such as providing you with requested information, products or services, or including the information you provide to us in the course of delivering a project).

## 3. Collection of Personal Information

### 3.1 When and how do we collect your information?

We may collect and hold Personal Information about you such as your name, gender, date of birth, contact details (including your address, phone numbers and emails, whether personal or for work), employment information, credit card details, and in some cases, information related to your education, health and use of social services.

We collect Personal Information directly from you in the following circumstances: in the course of delivering a project, when we consult with you directly or in a workshop; when you complete a survey, or when you correspond with us; when we otherwise supply you with services; when you request information about us or our products or services, provide feedback, change your content or email preferences; when you enter into an agreement or contract with us; when you fill in a form or a request for services, fill in a form on our website, or attend an event; when you become an employee of Nous; or when you otherwise contact us by telephone, facsimile, email, post or in person.

If the GDPR, or the UK GDPR apply, we are entitled to use your Personal Information in the circumstances stated above because:

- we have legal and regulatory obligations that we must discharge;

- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- the use of your Personal Information as described is necessary for our legitimate business interests (or the legitimate interests of one or more of our related bodies corporate), such as:
  - management consulting services; and
  - research into any market we operate in or are seeking to operate in, including, but not limited to education, health, defence, leadership, and public policy.

If the GDPR or UK GDPR applies to how we collect, use or disclose your Personal Information (including Sensitive Information), we will request that you provide us with your consent to collect, use or disclose your Personal Information. You may withdraw your consent any time in the same way you gave consent or by contacting us in any of the ways set out in clause 11.

Where required by the applicable Privacy Law, we will seek your consent to the processing of your Personal Information for specific purposes or your explicit consent when processing Sensitive Information (if applicable).

If you provide Personal Information about other individuals to us, you must ensure that you have informed those individuals that you are providing their Personal Information to us and that you have obtained their consent and advised them of our Privacy Policy.

### **3.2 Do we collect information about you in other ways?**

We may also collect Personal Information about you, such as names and email addresses, via third parties including from our clients, suppliers, through events or online marketing.

We may also process your Personal Information in performance of our contractual obligations when we receive it from a third party with whom you have entered a contract or at your request.

In some circumstances we may receive Personal Information that we have not requested. If this occurs, we will comply with our obligations under applicable Privacy Law. You acknowledge that we may de-identify and/or destroy this information unless we are required to keep it by law.

## **4. Information collected via our Website**

### **4.1 Website terms of use**

This Privacy Policy governs how we use, collect or disclose Personal Information provided on our Website. By using the Website you agree to the terms and conditions contained in this Privacy Policy.

We will not collect any Personal Information about users of our Website except when they knowingly provide it.

### **4.2 Click Stream Data**

When you visit and browse our Website, our Website host may collect Personal Information for statistical, reporting and maintenance purposes. Subject to clause 6.2, the Personal Information collected by our Website host will not be used to identify you. The information may include: the number of users visiting our Website and the number of pages viewed; the date, time and duration of a visit; the IP address of your computer; the path taken through our Website; or the browser type, operating system or website visited immediately before coming to our Website.

Our Website host uses this information to administer and improve the performance of our Website, including to assist with the diagnosis of and to provide support for any issues with our Website or services. This information is used in an aggregated manner to analyse how people use our Website, so that we can improve our service.

### **4.3 Cookies**

Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns.

If you access our Website, a cookie is downloaded onto your computer's hard drive when you first log on to our Website. We may use cookies to allow us to personalise your browsing on our Website. Most web browsers automatically accept cookies, but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our Website. Our Website may from time to time use cookies to analyse website traffic and help us provide a better website visitor experience.

#### **4.4 Web Beacons**

Web beacons are images that originate from a third-party site to track visitor activities. We may use web beacons to collect aggregate data and provide this information to our Website host to administer and improve the performance of our Website.

#### **4.5 Links to external websites**

If you follow any links to third party external websites from our Website, the Privacy Policy will not apply to those websites which may have their own policies relating to privacy and data collection and website usage. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. If you choose to access any linked website or to provide any Personal Information on such websites, you should review their policies and terms of use to learn more about how they may use your Personal Information. We are not responsible for and will not be liable for the operations or policies of any third-party external website.

## **5. How we use Personal Information?**

### **5.1 How we use the Personal Information we collect about you?**

We use the Personal Information we collect about you for our business functions and activities, which may include the following:

- (a) to provide you with information or services you have requested;
- (b) to promote and market our services to you;
- (c) to personalise and customise your experiences on our Website;
- (d) to deliver our consulting services to our clients;
- (e) to provide you with ongoing information about us and our activities;
- (f) to use and disclose aggregated or de-identified information for the purposes of data analysis, research and reporting;
- (g) to comply with regulatory or other legal requirements;
- (h) to protect the copyright, trademarks, legal rights, property or safety of Nous, its customers or third parties;
- (i) for purposes related to the recruitment and employment of our personnel and providing internal services to our staff; and
- (j) for any other use required or permitted by law or any other purpose communicated to you at the time that the Personal Information was collected or for which you subsequently provided your consent.

We may, if permitted by the applicable law, use your Personal Information for a secondary purpose if that secondary purpose is related to the purposes listed in this clause 5.1, if we have your consent or if otherwise provided for under applicable Privacy Law. In some jurisdictions, you may have the right to opt-out of use of your Personal Information for secondary purposes.

Generally, we will only collect and use your Personal Information in accordance with this Privacy Policy. If we collect or use Personal Information in ways other than as stated in this Privacy Policy, we will ensure that we do so in accordance with applicable Privacy Law.

## **5.2 Direct marketing**

Depending on the applicable Privacy Law, we may use your Personal Information to provide you with direct marketing materials if you consent to receive direct marketing materials, or as may be permitted by the law in your jurisdiction, if we have an existing relationship with you or if you would reasonably expect us to send you direct marketing materials.

If required, we will seek your consent to provide you with direct marketing materials if we have obtained your Personal Information from a third party. Direct marketing material may include promotional material about us or the products or services we offer.

We may use your Personal Information to send you direct marketing materials from any Nous Group entity located in Australia, the United Kingdom or Canada. If your consent is required for the purpose of direct marketing, we will only use your Personal Information for that purpose for up to 2 years from the date you last provided (or were last deemed to have provided) such consent.

You may opt out of receiving direct marketing material by clicking the unsubscribe facility in the direct marketing materials or by contacting us in any of the ways specified in the direct marketing materials or as set out in clause 11. We may continue to send you non-promotional communications, such as service-related emails and billing information.

## **5.3 Employee records**

Employee records may not be subject to Privacy Laws in the applicable jurisdictions. As such this Privacy Policy may not apply to the handling of employee related information. Please contact us directly for information about our employee information handling practices.

# **6. When do we disclose Personal Information?**

## **6.1 Who do we disclose your Personal Information to?**

Depending on the applicable Privacy Law and the nature of your relationship with us, we may disclose your Personal Information to our shareholders, officers and employees, other businesses within our group of companies, service providers who assist us in our business operations and recruitment activities (including third party service providers based overseas), government agencies, other third parties, (including parties that we engage to provide you with services on our behalf or who are connected with or involved in our relationship with you), or otherwise as required by law.

If there is an actual or prospective change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any Personal Information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality.

## **6.2 Service providers**

We may also disclose your Personal Information to our service providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner.

Personal information is only disclosed to a third party when it is required for the delivery of our services. To the extent that we do share your Personal Information with a service provider, we would only do so if that party has agreed to a confidentiality regime in relation to their services and access to your Personal Information.

We may also share non-personal, de-identified and aggregated information for research or promotional purposes in connection with providing requested information or services to you, or for the purpose of



improving our services. We will not sell your Personal Information to third parties for their own purposes, including for marketing purposes.

Unless otherwise specified in this Privacy Policy, we will not disclose any of your Personal Information to any other organisation unless the disclosure is required by law, is otherwise permitted by the applicable Privacy Law, or is with your consent.

## 7. Overseas disclosure and individuals based in Europe

### 7.1 Disclosure of your Personal Information overseas

Your Personal Information may be disclosed outside of your home country to an entity in a foreign country, including entities in which we have an ownership interest or to third party service providers (**Overseas Entities**). The country in which these Overseas Entities are located/likely to be located include the United Kingdom and Canada, where we have offices.

It is possible that the Overseas Entities may be subject to foreign laws that do not provide the same level of protection of information as in your home country or that provide a greater level of protection than in your home country. We take reasonable steps to ensure that these Overseas Entities do not breach the applicable Privacy Law and that they are obliged to protect the privacy and security of your Personal Information and use it only for the purpose for which it is disclosed.

### 7.2 Personal Information to which the GDPR or UK GDPR applies

If the GDPR or UK GDPR applies to how the Personal Information is transferred to us, how we deal with that Personal Information and how we may transfer that Personal Information to third countries will be subject to the requirements of the GDPR or UK GDPR.

Where we transfer your Personal Information outside the European Economic Area (**EEA**) or UK, we will ensure that it is protected in a manner that is consistent with how your Personal Information will be protected by us in the EEA or the UK. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the European Commission or the UK Government; or
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission or equivalent clauses approved by the UK Government, obliging them to protect your personal data.

In other circumstances the law may permit us to otherwise transfer your Personal Information outside the EEA or the UK. In all cases, however, we will ensure that any transfer of your Personal Information is compliant with applicable data protection laws.

You can obtain more details of the protection given to your Personal Information when it is transferred outside the EEA or the UK (including a copy of the standard data protection clauses which we have entered with recipients of your Personal Information) by contacting us in accordance with clause 11 below.

## 8. Storage and data security

Nous is committed to ensuring that the information you provide to us is secure. To prevent unauthorised access to or disclosure of Personal Information, we have taken steps to put in place suitable physical, electronic and managerial procedures designed to safeguard and secure Personal Information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

We aim to keep your Personal Information secure and up to date. We will comply with our obligations under applicable Privacy Law in relation to any Personal Information that we handle, including information which is held on our computer systems.

Personal Information that is held by us in hard copy is stored securely and is only disclosed or used for the purposes described in this Privacy Policy.

The Notifiable Data Breaches Scheme (**NDB scheme**) in Part IIIC of the AU Privacy Act sets out obligations for notifying affected individuals, and the Australian Information Commissioner, about an “**eligible data breach**” (as defined in the AU Privacy Act) which is likely to result in serious harm.

To the extent required by law, where a data or privacy breach occurs and serious harm to affected individuals has occurred or is likely, we will notify those individuals and the relevant supervisory authority in accordance with our obligations under applicable Privacy Law.

If the GDPR or the UK GDPR applies, you may have additional rights relating to security and protection of data and we will comply with our legal obligations. Where Nous is the data controller all queries in relation to these rights should be directed to our Privacy Officer in accordance with clause 11 below, however where Nous is the data processor, all queries relating to these rights should be directed to the data controller’s Data Protection Officer.

If you reside in Canada, Canadian Privacy Law may also require us to notify affected individuals and privacy regulators with respect to breaches of security safeguards that give rise to a real risk of significant harm to an individual.

You may contact our Privacy Officer via the contact details below should you require additional information.

## 9. How long will we keep your Personal Information?

We will keep your Personal Information only for as long as required for our business purposes and otherwise as required by applicable Privacy Law.

Where we no longer need to keep your Personal Information in accordance with this clause 9, we will take steps required by the applicable Privacy Law to destroy or de-identify your Personal Information.

If you wish to have your Personal Information destroyed or de-identified, please let us know and we will take steps required by the applicable Privacy Law to do so (unless we need to keep it for legal, auditing or internal risk management reasons, or as otherwise required or permitted by law).

## 10. Accessing, updating and correcting your Personal Information

We will take reasonable steps to ensure that the Personal Information that we hold is accurate, up-to-date and complete. You can request a correction of, or update to your Personal Information at any time by contacting us in any of the ways specified in clause 11. We welcome any changes to your Personal Information to keep our records up to date.

You are entitled to request access to Personal Information that we hold about you. If you request access to your Personal Information, we will grant your request to the extent required or permitted by applicable Privacy Law. If we refuse your request to access your Personal Information, to the extent required under applicable Privacy Law, we will provide you with written reasons for the refusal.

If the GDPR or UK GDPR applies, you may have additional rights under the GDPR, including in relation to the right to access your Personal Information, to rectify your Personal Information, to erase your Personal Information (the ‘right to be forgotten’), to restrict processing of your Personal Information and the right to receive your Personal Information (the ‘right of portability’). If the GDPR or the UK GDPR applies, we will comply with our obligations in relation to the exercise of your rights under the GDPR or the UK GDPR.

If you are a resident of Canada, you may have similar additional rights under Canadian Privacy Law, including in relation to the right to access your Personal Information, to request correction of your Personal Information and to withdraw your consent to the continued use of your Personal Information

(including retention), subject to statutory restrictions. If Canadian Privacy Law applies we will comply with our obligations in relation to the exercise of your rights under such law.

To exercise any of your rights in relation to Personal Information, including making a request for access, please contact us in any of the ways specified in clause 11. We are entitled to charge you a fee to comply with your request for information, however, if the GDRP or UK GDPR applies, we will not charge you for information we provide to you unless we are entitled to do so in accordance with GDPR or UK GDPR.

## 11.How to contact us, find out more information or make a complaint

If you feel that your privacy has not been respected or that we have conducted ourselves inconsistently with this Privacy Policy, or applicable Privacy Law in respect of your Personal Information, or for any other queries, problems, complaints or communication in relation to this Privacy Policy, please contact us in any of the following ways:

**Attention Privacy Officers:**

- **Australia:** Veronica Hall and Warrick Louey
- **Canada:** Janet Vanderlaan and Emma Kenyon
- **UK:** Nic Dillon

**Post:** Level 23, 697 Collins Street, Docklands, Victoria 3008, Australia

**Email:** [privacy@nousgroup.com](mailto:privacy@nousgroup.com)

When contacting us please provide as much detail as possible in relation to your query, problem or complaint. We take all complaints seriously and will respond to your complaint in accordance with any applicable timeframes imposed by law and otherwise within a reasonable period. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

## Cookie Policy

This Cookie Policy explains how Nous Group Pty Ltd Australia (ABN 66 086 210 344) and its related bodies corporate, including Nous Data Insights Group Pty Ltd (ABN 15 613 111 443) and its related bodies corporate, (“**Nous**,” “**we**,” “**us**,” or “**our**”) uses cookies to recognise when you visit our website <https://nousgroup.com>. In some instances, we collect information so that we may improve the use of our website and enhance your experience.

## What are cookies?

Cookies are small text files saved on your mobile device, computer, tablet, or other device when you visit a website. Cookies are widely used to ensure websites work and function efficiently. Cookies also allow websites to recognise a user’s device and store information about the user’s preferences or past actions.

The tables below provide an overview of the cookies used on our website, including details of the provider, their source, duration, and the reason for their use.

## Strictly necessary cookies

Strictly necessary cookies are essential to enable you to browse our website and use its features. These cookies keep your information secure while you use our website. We are not required to ask permission to use them.

Name	Description	Provider	Expiry
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CraftSessionId	Craft relies on PHP sessions to maintain sessions across web requests. That is done via the PHP session cookie. Craft names that cookie "CraftSessionId" by default, but it can be renamed via the phpSessionId config setting. This cookie will expire as soon as the session expires.	This site	Expires at the end of session
*_identity	When you log into the Control Panel, you will get an authentication cookie used to maintain your authenticated state. The cookie name is prefixed with a long, randomly generated string, followed by _identity. The cookie only stores information necessary to maintain a secure, authenticated session and will only exist for as long as the user is authenticated in Craft.	This site	Persistent
*_username	If you check the "Keep me logged in" option during login, this cookie is used to remember the username for your next authentication.	This site	Persistent
CRAFT_CSRF_TOKEN	Protects us and you as a user against Cross-Site Request Forgery attacks.	This site	Expires at the end of session

## Analytics cookies (optional)

With your permission, we use the following analytics cookies to collect data about how you use our website. This information helps us to improve our service.

Name	Description	Provider	Expiry
_gid	Used to distinguish users.	Google	24 hours
_ga	Distinguishes users on a domain	Google	2 years
_gat	Limits the number of user requests	Google	1 minute
visitor_id<accountid>	The visitor cookie includes a unique visitor ID to distinguish visitors.	Salesforce	1 year
pi_opt_in<accountid>	This cookie tracks whether or not a visitor has opted in to tracking or not.	Salesforce	1 year
visitor_id<accountid>-hash	This cookie is a security measure to make sure that a malicious user can't fake a visitor and access corresponding prospect information.	Salesforce	1 year
lpv<accountid>	This LPV cookie is set to keep us from tracking multiple page views on a single asset over a 30-minute session.	Salesforce	1 year
pardot	The cookie denotes an active session and isn't used for tracking.	Salesforce	1 year

bcookie	Used for tracking the use of embedded services.	LinkedIn	2 years
lang	Used to remember your selected language preference during your time on the site. Expires at the end of your session.	LinkedIn	Expires at the end of session

## Functional cookies (optional)

With your permission, these cookies allow our website to remember your browsing choices and preferences.

Name	Description	Provider	Expiry
userRegion	Stores what country the current user is located in. This is to display content specific for that country.	This site	Persistent
selectedRegion	Stores what country the current user has selected from the navigation dropdown option. This is to display content specific for that country.	This site	Persistent

## Advertising cookies (optional)

With your permission, these cookies are used to track users' browsing behaviour and interests. They are used by advertisers to deliver personalised ads and measure the effectiveness of advertising campaigns.

Name	Description	Provider	Expiry
lidc	Used for tracking the use of embedded services.	LinkedIn	24 hours
UserMatchHistory	Used to identity you as a new or returning visitor	LinkedIn	1 month
BizolD	Used to create a temporary identifier.	LinkedIn	1 month

Page last updated – 15 March 2024.



Nous Group acknowledges Aboriginal and Torres Strait Islander peoples as the First Australians and the Traditional Custodians of Country throughout Australia. We pay our respect to Elders past and present, who maintain their culture, Country and spiritual connection to the land, sea and community.

[Read more about our commitment to reconciliation.](#)

### About Nous

Why Nous  
Our Purpose & Story  
News & Media

### Our Commitments

Reconciliation  
Net Zero  
Equity, Diversity & Inclusion  
Community Partnership Scheme

### Your Needs

Strategy  
Public Policy  
Regulation  
Economics  
Evaluation  
First Nations  
Transformation & Implementation  
Organisational Performance  
Leadership & Capability  
Data & Analytics  
Digital & AI  
Design

### Your Sector

Defence & Security  
Education  
Energy & Decarbonisation  
Environment & Agriculture  
Financial Services  
Government  
Health & Ageing  
Human Services  
Justice & Emergency Management  
Planning & Precincts  
Transport & Infrastructure

### Our People

### Our Thinking

### Our Work

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