

# Privacy Compliance Statement

## GHD Foundation Privacy Policy

This Privacy Policy outlines how the companies which constitute the GHD Foundation<sup>1</sup> (collectively “GHD Foundation”) collects, uses and stores personal information in the course of its operations from donors, employees, applicants for employment, contractors, clients, suppliers, and other individuals (referred to as “you” or “your” in this Privacy Policy).

GHD Foundation respects and upholds your right to privacy protection. GHD Foundation recognises applicable local laws and regulations and relevant data protection standards in respect of the collection, use, disclosure storage and transfer of personal information from individuals.

This Privacy Policy details the practices we have adopted to protect your privacy so that you can understand how we manage your “personal information”, any “personally identifiable information” or “personal data” (as defined under the European Union’s General Data Protection Regulation or “GDPR”) (together collectively referred to as “personal information” in this Privacy Policy), you entrust to us.

This Privacy Policy also sets out how you can contact us in relation to your personal information and, if requested by you, opt-out of this Privacy Policy, limit the use of, or amend, any personal information we may have about you.

By providing us with personal information about yourself through our website, any GHD Foundation webpage or otherwise, you consent to the collection, use, disclosure, storage and transfer of that personal information as set out in this Policy. If at any time, you wish to withdraw your consent to the collection, use, disclosure, storage and transfer of your personal information in accordance with our Privacy Policy, you may opt-out by contacting us (refer to the Contact Us information below) or by immediately ceasing to provide any further personal information about yourself to GHD Foundation via its website or otherwise.

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<sup>1</sup> GHD Foundation" is a reference to the three separate registered charitable companies which together constitute the GHD Foundation and are registered as follows : United States (EIN 86-1440814); Australia (ABN [12 645 424 862](#)); and Canada (Registration No. [796286144 RR 0001](#))

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## 1. When do we collect and hold personal information?

Personal information is any information that can be used to identify you (either directly or indirectly), and may be collected directly from you, by a third party you have given consent to disclosing your personal information, or by a credit agency, government or statutory body.

We collect and store personal information (including names, telephone numbers, address, email address, occupation, education and qualifications, etc) in a range of contexts, such as:

- when entering into relationships with new donors or potential donors;
- when engaging with other charitable bodies or organisations to further our objectives;
- when individuals apply for employment or other opportunities with us;
- when individuals register online for access to secure sites or collaboration services hosted by GHD Foundation or third parties on behalf of GHD Foundation.

## 2. What do we do with personal information?

We may use your personal information:

- to enable us to deliver our programs to beneficiaries;
- to communicate information to you about our programs and initiatives that may interest you;
- for our internal administrative, planning, product development, marketing and research requirements;
- to consider the suitability of applicants for employment with us, which may be processed by third parties engaged to undertake pre-employment screening services;
- to complete transactions you have authorised and manage your support;
- for research purposes to assist us to better understand and connect with our supporters or
- for any other reason you allow or consent to.

As an example, one of the key objectives of GHD Foundation's website is to provide information about who we are and what we do. We may collect personal information to update our website and in order to provide relevant information about GHD Foundation, our programs, or our capabilities in a variety of contexts.

### **3. Reasons we may share or disclose your personal information**

Whilst at all times complying with this Privacy Policy and having primary regard for the protection of your personal information, GHD Foundation may share or disclose your personal information in a number of circumstances, such as:

- between the GHD Foundation entities;
- when passing information between, credit, law enforcement, and other government and regulatory agencies, and professional services providers, if required;
- as necessary, to complete any transaction you have authorised;
- with members of the GHD group of companies<sup>2</sup> who may be assisting the GHD Foundation and need to know for the purpose for which the information was provided; or
- otherwise as you may consent.

Some examples:

- As part of the provision of our services, we may outsource some of our functions to third parties, which may involve the disclosure of your personal information. These third parties will not be authorised to use your personal information for any purpose or purposes other than that for which your personal information is disclosed.
- GHD Foundation is a global organisation. We may disclose your personal information to GHD Foundation offices in countries outside the country in which it was collected, if it is necessary for one of the purposes the information has been disclosed to us.
- GHD Foundation technology support is provided from the Philippines and, for that purpose, your personal information may be accessed remotely from the Philippines.

If we disclose your personal information to an office in a country other than the country in which it is collected, we will take all reasonable steps to ensure a level of data protection at least as protective of that required in the European Union's GDPR, which offers high levels of personal information protection.

We will also require any GHD Foundation agents who are outside your jurisdiction and to whom we transfer information about you to ensure a similar level of data protection as required by the European Union's GDPR when it comes to protecting your personal information. GHD Foundation will not use, share or disclose your personal information that was collected for a particular purpose for another secondary purpose (which you would not reasonably expect) without your consent unless we are required or authorised by law, or compelled for legitimate legal reasons by government authority or law enforcement agency. GHD Foundation must seek additional consent from you to use or retain your personal information other than as set out in this Privacy Policy and you have the choice to opt-out at all times by contacting us (as outlined below).

Your personal information is never shared, sold or rented except if required by law or with your consent.

### **4. Marketing and communications**

GHD Foundation delivers dynamic programs. For this reason, we may send marketing material or communicate information that we think may be relevant or of interest to you including about our latest programs.

At any time, you may opt-out of receiving any communications from us or change your marketing communication preferences.

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<sup>2</sup> The GHD group of companies includes GHD Group Limited and any other company carrying on business that is part of the GHD group of companies

Electronic marketing or communications material will have an “unsubscribe” link or contain instructions allowing you to opt-out or change your preferences. Alternatively, you can contact us directly about our marketing and communications by using the contact details below.

## **4.1 California residents and direct marketing**

California residents are entitled once a year, free of charge, to request and obtain certain information regarding GHD Foundation’s disclosure of certain categories of personal information to third parties for their direct marketing purposes in the preceding calendar year. It should be noted that GHD Foundation does not disclose personal information to third parties for direct marketing purposes, regardless of jurisdiction.

## **5. How do we use "cookies", "log files", data analytics and other similar technology?**

### **5.1 Cookies**

The GHD Foundation website located at [www.ghdfoundation.org](http://www.ghdfoundation.org) (a website which is operated by a third party) use cookies for collecting information.

A “cookie” is a small data file that is placed on your computer or other device to allow a website to recognise you as a user when you return to the website using the same computer and web browser, either for the duration of your visit (using a ‘session cookie’) or for repeat visits (a ‘persistent cookie’). Other similar files work in the same way and we use the word “cookie” in this Privacy Policy to refer to all files that collect information in this way.

You may disable cookies by changing the settings on your browser – please refer to your browser options or instructional material. If you disable cookies, it is likely to affect how your browser works. For more information on cookies visit: [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **5.2 Log files**

The GHD Foundation located at [www.ghdfoundation.org](http://www.ghdfoundation.org) (a website which is operated by a third party) uses log files on a limited basis to record appropriate access to some project information by registered users.

A log file or log is the automatically produced and time-stamped documentation of events relevant to a particular system. From the server’s log files, an administrator can identify numbers of visitors, the domains from which they are visiting, the number of requests for each page and usage patterns.

### **5.3 Data analytics (such as Google Analytics™) and other technologies**

The GHD Foundation website located at [www.ghdfoundation.org](http://www.ghdfoundation.org) (a website which is operated by a third party) uses log files and Google Analytics™.

We may automatically log IP addresses (i.e., the electronic addresses of computers connected to the Internet) to analyse trends, administer the site, track user movements, and gather broad demographic information.

We may collect and use data relating to the geographical location of your computer or mobile internet device. We use this to provide country and region-specific information.

This information collected is not “personal information” and you cannot be identified from its collection. It is only used to assist GHD Foundation in optimising the content and effectiveness of our website.

## **6. Links to third party websites**

Websites operated on our behalf may contain links to other websites that are operated by third parties. Whilst GHD Foundation tries to link only websites that share our high standards and respect for privacy, we make no representations or warranties as to the privacy practices of any third-party site and cannot be responsible for the privacy policies, content or security of other sites. This Privacy Policy does not apply to, or cover, linked websites.

If you access or share information to websites linked to our website, the operators of those websites may collect your information in accordance with their own privacy policies that may differ to ours. You should review the privacy, "cookie" and other policies displayed on these websites to find out how your personal information may be used and stored.

## **7. Your privacy rights?**

You have the right to ask us for copies of your personal information.

You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

You have the right to ask us to erase your personal information in certain circumstances.

You have the right to ask us to restrict the processing of your personal information in certain circumstances.

You have the right to object to the processing of your personal information in certain circumstances.

You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please submit a request to the GHD Foundation as per the contact details below, and we will respond to your request as required by applicable law.

For security reasons, we will ask you to verify your identity to ensure that we do not provide personal data to the wrong person or change or remove your personal data without your express consent.

## **8. Future changes to our Privacy Policy**

Your privacy is important to us and GHD Foundation is committed to our privacy practices being up-to-date with prevailing best practices and changes in local laws, regulations and data protection standards and technology.

Given this, we may change our Privacy Policy from time to time and will notify you by posting an updated version of our Privacy Policy on our website. The amended policy will apply between us as and when it is posted on our website. This document represents GHD Foundation's Privacy Policy as at 31 March 2025.

## **9. How to contact us**

If you have any questions about our Privacy Policy, wish to opt-out of our Privacy Policy or have any complaint regarding the treatment of your privacy or personal information by us, please contact GHD Foundation, using the Contact Us link on our website, or contact our Integrity Officer using the details set out below. Any genuine concerns or complaints will be investigated and responded to in line with local law.

**Integrity Officer**

c/- Office of the Company Secretary  
Level 15, 133 Castlereagh Street

Sydney NSW 2000

Email: [integrity@ghdfoundation.org](mailto:integrity@ghdfoundation.org)

Website: [www.ghdfoundation.org](http://www.ghdfoundation.org)

If you have concerns about your privacy, dependent on your location, you are entitled to refer your complaint to a relevant privacy regulator. We will provide you details of any relevant regulator on request.