Privacy Policy

HKRP Australia Pty Ltd (ABN 62 630 911 474) and HKRP UK Ltd (company number 14189655) (we, us or our), understand that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us or otherwise collected by us when providing our website and consulting services (Services) or when otherwise interacting with you.

This Privacy Policy takes into account the requirements of the Privacy Act 1988 (Cth) and the Australian Privacy Principles. In addition to the Australian laws, individuals located in the European Union or European Economic Area (EU) may also have rights under the General Data Protection Regulation 2016/679 and individuals located in the United Kingdom (UK) may have rights under the General Data Protection Regulation (EU) 2016/679) (UK GDPR) and the Data Protection Act 2018 (DPA 2018) (together, the GDPR). Appendix 1 outlines the details of the additional rights of individuals located in the EU and UK as well as information on how we process the personal information of individuals located in the EU and UK.

The information we collect

Personal information: is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The types of personal information we may collect about you include:

- **Identity Data** including first name, last name, title, job title.
- **Contact Data** including billing address, email address and telephone numbers.
- **Financial Data** including bank account and/or payment card details.
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us.
- **Technical and Usage Data** including internet protocol (IP) address, your login data, your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour, information about your access and use of our website, including through the use of Internet cookies, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, the following information:
    - date of birth;
    - gender;

- marital status and dependants;
- next of kin and emergency contact information;
- National Insurance number (for UK employees);
- bank account details, payroll records and tax status information;
- salary, annual leave, pension/ superannuation, and benefits information;
- start date and, if different, the date of your continuous employment, and leaving date and your reason for leaving;
- location of employment or workplace;
- driver's licence or other form of identification;
- recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process);
- employment records (including job titles, work history, working hours, holidays, training records and professional memberships);
- compensation history;
- performance information;
- disciplinary and grievance information;
- CCTV footage and other information obtained through electronic means such as swipe card records;
- information about your use of our information and communications systems;
- photographs; or
- results of HMRC employment status check (for UK employees), and details of your interest in and connection with the intermediary through which your services are supplied.

- **Sensitive information** is a sub-set of personal information that is given a higher level of protection. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information. In the course of providing our Services, we may collect, or come across such sensitive information in different situations, including when reviewing your application for work with us. We will handle all sensitive information in accordance with the applicable laws.

How we collect personal information

We collect personal information in a variety of ways, including:

Directly: We collect personal information which you directly provide to us, including through the 'contact us' form on our website or when you request our assistance via email, or over the telephone.

Indirectly: We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, in emails, over the telephone and in your online enquiries.

From third parties: We collect personal information from third parties, such as government agencies (where required), and details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.

From publicly available sources: We collect personal data from publicly available resources such as the Australian Securities and Investment Commission (ASIC), Companies House, and professional networking sites such as LinkedIn.

Why we collect, hold, use and disclose personal information

We have set out below, in a table format, a description of the purposes for which we plan to collect, hold, use and disclose your personal information.

Purpose of use / disclosure	Type of Personal Information
To provide our Services to you, and to contact and communicate with you about our Services, including in response to any enquiries you make with us.	• Identity Data • Contact Data
To contact and communicate with you about any enquiries you make with us via our website.	• Identity Data • Contact Data
For internal record keeping, administrative, invoicing and billing purposes.	• Identity Data • Contact Data • Financial Data • Transaction Data
For analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms.	• Technical and Usage Data
For advertising and marketing, including to send you promotional information that we consider may be of interest to you.	• Identity Data • Contact Data • Technical and Usage Data

Purpose of use / disclosure	Type of Personal Information
	• Marketing and Communications Data
If you have applied for work with us; to consider your application.	• Identity Data • Contact Data • Professional Data
To comply with our legal obligations or if otherwise required or authorised by law.	• Any relevant personal information
Sensitive information: We only collect, hold, use and disclose sensitive information for the following purposes: any purposes you consent to; the primary purpose for which it is collected, including to determine your suitability for employment with us; secondary purposes that are directly related to the primary purpose for which it was collected, including disclosure to the below listed third parties as reasonably necessary to provide our Services to you; to contact emergency services, or to speak with your family, partner or support person where we reasonably believe there is a serious risk to the life, health or safety of you or another person and it is impracticable for us to obtain your consent; and if otherwise required or authorised by law.	• Sensitive Information

Our disclosures of personal information to third parties

We may disclose personal information to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers such as Azure;
- marketing or advertising providers;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators such as [e.g. Stripe, PayPal];
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;

- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;

- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;

- third parties to collect and process data, such as Google Analytics (To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time); and

- any other third parties as required or permitted by law, such as where we receive a subpoena.

Google Analytics: We may have enabled Google Analytics Advertising Features including [Remarketing Features, Advertising Reporting Features, Demographics and Interest Reports, Store Visits, Google Display Network Impression reporting etc.]. We and third-party vendors may use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together.

You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found here. To opt-out of personalised ad delivery on the Google content network, please visit Google's Ads Preferences Manager here or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin here. To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select "ads" to control the settings. On iOS devices with iOS 6 and above use Apple's advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device.

Overseas disclosure

We may store personal information overseas outside of the country where you are based, including in the United Kingdom and Australia. Where we disclose your personal information to the third parties listed above, these third parties may also store, transfer or access personal information outside of Australia. We will only disclose your personal information overseas in accordance with the Australian Privacy Principles.

Your rights and controlling your personal information

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services, or your employment application with us.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Anonymity: Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Access: You may request access to the personal information that we hold about you. We will respond to your request within one month (extendable to three months for complex requests). An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

Data Portability: Where technically feasible, you can receive your personal information in a structured, commonly used format or have it transmitted to another controller where the processing is based on consent or contract or the processing is automated.

Withdraw Consent: Where processing is based on consent, you can withdraw it at any time without affecting the lawfulness of prior processing.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. If you are not satisfied with our response, you also have the right to contact the Office of the Australian Information Commissioner.

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website and allow third parties, such as Google to evaluate the use of our website, compile a report on website activity for website operators. If and when you choose to provide our online website with personal information, this information may be linked to the data stored in the cookie.

When you first visit our website, you will see a cookie notice explaining our use of cookies. You can choose which types of cookies to accept through our cookie preference centre. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

We use the following cookies:

- **Strictly necessary cookies**. These are cookies that are required for the operation of our online Services. They include, for example, cookies that enable you to log into secure areas of our online Services, use a shopping cart or make use of online payment services.

- **Analytical/performance cookies**. These are cookies that allow us to recognise and count the number of visitors to our online Services and to see how visitors move around our online Services when they are using them. This helps us to improve the way our online Services work, for example, by ensuring that users find what they are looking for easily.

- **Functionality cookies**. These are used to recognise you when you return to our online Services. These cookies enable us to personalise our content for you and remember your preferences (for example, your choice of language or region).

You can find more information about the individual cookies we use, their category, and the purposes for which we use them in the table below:

Cookie	Category	Purpose
PHPSESSIONID	Analytical/ performance	This cookie contains a unique ID to support functions (for example, last viewed pages) to improve user experience
_ga / _gid / _gat	Analytical/ performance	These cookies are used by our Google Analytics account to track customer traffic through the website to help us understand how our website is being used by our users
messagesUtk	Fuctionality	This cookie is used for our live chat tool and allows us to recognise visitors who chat with us using the live chat on our website.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of our online Services.

Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact us at:

HKRP Australia Pty Ltd (ABN 62 630 911 474)

Email: info@hkrp.com

Last update: 9 March 2026

Hitesh Patel, Director

APPENDIX 1: ADDITIONAL RIGHTS AND INFORMATION FOR INDIVIDUALS LOCATED IN THE EU OR UK

Under the GDPR individuals located in the EU and the UK have extra rights which apply to their personal information. Personal information under the GDPR is often referred to as personal data and is defined as information relating to an identified or identifiable natural person (individual). This Appendix 1 sets out the additional rights we give to individuals located in the EU and UK, as well as information on how we process the personal information of individuals located in the EU and UK. Please read the Privacy Policy above and this Appendix carefully and contact us at the details at the end of the Privacy Policy if you have any questions.

What personal information is relevant?

This Appendix applies to the personal information set out in the Privacy Policy above. This includes any Sensitive Information also listed in the Privacy Policy above which is known as 'special categories of data' under the GDPR.

With regard to the special categories of data we collect, this will only be used by us:

- in limited circumstances, with your explicit written consent;
- where we need to carry out our legal obligations or exercise rights in connection with employment; or
- where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Purposes and legal bases for processing

We collect and process personal information about you only where we have legal bases for doing so under applicable laws. We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please reach out to us if you need further details about the specific legal ground, we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose of use / disclosure	Type of Data	Legal Basis for processing
To provide our Services to you, and to contact and communicate with you about our Services, including in	• Identity Data • Contact Data	• Performance of a contract with you

Purpose of use / disclosure	Type of Data	Legal Basis for processing
response to any enquiries you make with us.		
To contact and communicate with you about any enquiries you make with us via our website.	• Identity Data • Contact Data	• Legitimate interests: to ensure we provide the best client experience we can offer by answering all of your questions.
For internal record keeping, administrative, invoicing and billing purposes.	• Identity Data • Contact Data • Financial Data • Transaction Data	• Performance of a contract with you • To comply with a legal obligation • Legitimate interests: to recover debts due to us and ensure we can notify you about changes to our [terms of business] and any other administrative points.
For analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms.	• Technical and Usage Data	• Legitimate interests: to keep our website updated and relevant, to develop our business, improve our Services and to inform our marketing strategy
For advertising and marketing, including to send you information that we consider may be of interest to you.	• Identity Data • Contact Data • Technical and Usage Data • Marketing and Communications Data	• Legitimate interests: to develop our Services and grow our business
If you have applied for work with us; to consider your application.	• Identity Data • Contact Data • Professional Data	• Legitimate interests: to consider your employment application

Purpose of use / disclosure	Type of Data	Legal Basis for processing
To comply with our legal obligations or if otherwise required or authorised by law.		• To comply with a legal obligation

If you have consented to our use of data about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your data because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using our services. Further information about your rights is available below.

Data Transfers

The countries to which we send data for the purposes listed above may be less comprehensive that is what is offered in the country in which you initially provided the information. Where we transfer your personal information outside of the country where you are based, we will perform those transfers using appropriate safeguards in accordance with the requirements of applicable data protection laws and we will protect the transferred personal information in accordance with this Privacy Policy and Appendix 1. This includes:

- only transferring your personal information to countries that have been deemed by applicable data protection laws to provide an adequate level of protection for personal information;
- putting in place a contract with the third party that means they must protect personal data to the same standards as the UK; or
- including standard contractual clauses in our agreements with third parties that are overseas.

We only transfer the minimum amount of personal data necessary and require all recipients to:

- protect your information to the same standards required by UK law;
- use your information only for the purposes we've agreed;
- allow us to monitor how they handle your information; and
- provide you with the same rights over your information that you have under UK law.

Data retention

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Extra rights for EU and UK individuals

You may request details of the personal information that we hold about you and how we are process it (commonly known as a “data subject request”). You may also have a right in accordance with applicable data protection law to have your personal information rectified or deleted, to restrict our processing of that information, to object to decisions being made based on automated processing where the decision will produce a legal effect or a similarly significant effect on you, to stop unauthorised transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to you or another organisation.

If you are not happy with how we are processing your personal information, you have the right to make a complaint at any time to the relevant Data Protection Authority based on where you live. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Authority, so please contact us in the first instance using the details set out above in our Privacy Policy above.

Exercising Your Rights

To exercise any of these rights, contact us using the details in this Privacy Policy. We may ask for proof of identity and will respond within one month (extendable to three months for complex requests).

Your right to complain to the regulator

You can also make a complaint directly to the Information Commissioner's Office (ICO), the UK's data protection regulator, at any time.

The ICO’s address:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

You don't have to contact us first before going to the ICO, but we'd appreciate the opportunity to try to resolve your concerns directly with you.