Document Name:	Privacy Policy
Approved by:	Directors
Approval date:	June 2026
Last Reviewed:	June 2026
Version:	2
Review Date:	June 2027

Purpose

Moonsail is a creative agency. In the course of our work we're entrusted with personal information about our clients, their contacts, our suppliers, contractors and people who apply to work with us. Protecting that information matters to us, and this policy sets out how we look after it.

This policy explains how Moonsail collects, uses, holds and discloses personal information, and how you can access, correct or complain about the handling of your information. We handle personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs) and (where applicable) in accordance with the Privacy and Responsible Sharing of Information Act (WA) 2024 (PRIS Act (WA))

Who we are

In this policy, "Moonsail", "we", "us" and "our" refer to Coghlan Nankivell Pty Ltd, trading as Moonsail [ABN to be inserted], a creative agency based in Perth, Western Australia. This policy covers the personal information we handle as Moonsail.

What personal information we collect

The kinds of personal information we collect depend on your relationship with us. They may include:

- **Contact and identity details:** such as your name, email address, phone number, job title and the organisation you work for.
- **Client and project information:** information you provide so we can scope, deliver and bill for work — which can include details about your own staff or contacts, image and/or voice rcordings and social media handles.
- **Supplier and contractor details:** information we need to engage and pay people and businesses we work with, including contractors and freelancers.
- **Marketing preferences:** whether you've chosen to receive our updates, and your interactions with them.
- **Recruitment information:** details in job applications, including your CV, work history and referee details.
- **Website and technical information:** such as your IP address and how you use our site, collected through cookies and analytics.

We try to collect only the personal information we reasonably need. Where it's practicable and lawful, you can deal with us anonymously or using a pseudonym — though for most of our services we'll need enough detail to identify and contact you.

Sensitive information

We generally don't seek sensitive information (such as health, racial or ethnic background). If we ever need to collect it — for example, dietary or accessibility requirements for an event — we'll only do so with your consent and for a specific purpose.

How we collect it

We collect personal information directly from you wherever we can — when you contact us, enquire about our services, become a client or supplier, subscribe to our updates, apply for a role, or interact with our website and campaigns. Sometimes we collect it from others, such as a colleague who refers you, a client who provides their team's contact details, publicly available sources, or our service providers.

Why we use it

We use personal information to:

- Respond to your enquiries and provide our services
- Manage our relationships with clients, suppliers and contractors
- Deliver, manage and bill for projects
- Send you updates and marketing where you've asked to receive them
- Recruit and assess candidates
- Run and improve our website and campaigns
- Meet our legal, accounting and record-keeping obligations

If we plan to use your information for a materially different purpose, we'll seek your consent unless the law allows otherwise.

Marketing and how to opt out

Where you've opted in, we may send you news, updates and occasional offers. Every marketing email includes an unsubscribe link, and you can opt out at any time by using it or contacting us. We don't sell your personal information, and we don't share it with third parties for their own marketing.

Who we share it with

We may disclose personal information to:

- Our team and contractors who need it to do their work
- Our service providers — including our document storage and file systems (Microsoft 365 / SharePoint, hosted in Australia; an on-site server in our Perth office; and LucidLink), our backup provider (Backblaze), our creative software (Adobe Creative Cloud), and our accounting and job-management providers (Xero and Streamtime)
- Production and specialist partners engaged to deliver a project
- Professional advisers such as our accountants and lawyers
- Anyone you've authorised, or where we're required or permitted by law (including any identified client that you have authorised)

We require our service providers to protect personal information and to use it only for the purposes we engage them for. There are additional obligations and requirements imposed by WA State entities where that State entity is an identified client. These matters are regulated by the PRIS Act (WA). If you have any concerns about information that might be disclosed to a State entity in Western Australia, please contact us to discuss the matter.

Where we store information and overseas disclosure

Our primary document storage is Microsoft 365 / SharePoint, hosted in Australia, supported by an on-site server in our Perth office. Some of the other tools we use — such as our file system, backup, creative software and accounting providers — may store or process data on servers located outside Australia, or be based overseas, which depending on the provider may include New Zealand, the United States, the European Union and the United Kingdom. Where this is the case, we take reasonable steps to ensure those providers handle your information consistently with the APPs.

How we keep it secure

We take reasonable steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure. These steps include access controls, multi-factor authentication on key systems, secure cloud storage, and limiting access to those who need it. No system is completely secure, but we work to protect your information and to respond quickly if something goes wrong.

How long we keep it

We keep personal information only for as long as we need it for the purposes described in this policy, or as required by law. When it's no longer needed, we take reasonable steps to destroy it or permanently de-identify it.

Data breaches

If a data breach occurs that's likely to result in serious harm to affected individuals, we'll act in line with the Notifiable Data Breaches scheme under the *Privacy Act 1988* (Cth) — including assessing the breach, notifying affected individuals, and notifying the Office of the Australian Information Commissioner (OAIC) where required. Where applicable, data breaches under the PRIS Act (WA) are dealt with by us in accordance with the PRS Act (WA)

Accessing and correcting your information

You can ask us for access to the personal information we hold about you, and ask us to correct it if it's inaccurate, out of date or incomplete. Contact us using the details below. We'll respond within a reasonable time. In some cases the law allows us to decline access — if so, we'll explain why.

Complaints

If you think we've mishandled your personal information or breached the APPs, please contact us using the details below so we can look into it. We take complaints seriously and will respond within a reasonable time. If you're not satisfied with our response, you can contact the Office of the Australian Information Commissioner at oaic.gov.au or 1300 363 992.

Our website and cookies

When you visit our website, we may collect technical information such as your IP address, browser type and pages viewed, including through cookies and analytics tools, to help us understand how the site is used and to improve it. You can manage cookies through your browser settings.

Changes to this policy

We may update this policy from time to time. The current version will always be available on our website, and the date in the table above shows when it was last reviewed.

How to contact us

For any privacy question, request or complaint, contact Moonsail:

Entity	Coghlan Nankivell Pty Ltd, trading as Moonsail
Attention	Privacy / The Directors
Email	hello@moonsail.com.au
Post	Level 1 / 587 Wellington Street, Perth 6000