
PRIVACY POLICY

Australian Privacy Principles — Privacy Act 1988 (Cth)

Effective: April 2026 | Version 1.0

1. INTRODUCTION

Farragan Group (ABN 11022310331) ('Farragan Group', 'we', 'us', 'our') is committed to protecting the privacy of individuals whose personal information we collect, hold, use, and disclose.

This Privacy Policy explains how we manage personal information in accordance with the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth). It applies to all personal information collected through our website, service engagements, and other business activities.

By engaging with us or using our website, you agree to the collection and use of your information in accordance with this policy.

2. About Farragan Group

Farragan Group is a boutique fractional technology leadership consultancy. We provide CIO-level strategic expertise to Australian small and medium-sized enterprises on a fractional basis. Our services span strategy and governance, architecture and applications, security and resilience, innovation and AI readiness, and structure and resourcing.

Registered office: New South Wales, Australia.

Privacy enquiries: privacy@farragan.com.au

3. Personal Information We Collect

We collect personal information that is reasonably necessary for our business functions. This may include:

Contact and identity information:

- Full name, job title, and organisation
- Business and personal email addresses
- Phone numbers and postal addresses

Engagement and service information:

- Information provided during client onboarding, assessments, and service delivery
- Technology environment details, organisational structure, and business objectives
- Feedback, survey responses, and correspondence

Website and digital information:

- IP addresses, browser type, and device information
- Pages visited, referral sources, and session duration (via cookies and analytics tools)
- Contact form submissions and newsletter subscription details

We do not collect sensitive information (as defined under the Privacy Act) unless required for a specific engagement and with your explicit consent.

4. How We Collect Personal Information

We collect personal information through:

- Direct interactions — when you contact us by email, phone, or via our website

- Client engagements — during onboarding, assessments, workshops, and ongoing advisory work
- Public sources — business directories, LinkedIn, and other publicly available sources
- Third parties — referral partners, event organisers, or professional associations
- Automated technologies — cookies and analytics tools used on our website

Where practicable, we collect personal information directly from you.

5. Purposes of Collection

We collect, hold, use, and disclose personal information for the following purposes:

- Delivering fractional vCIO and technology advisory services
- Responding to enquiries, proposals, and client communications
- Administering client accounts, contracts, and invoicing
- Sending service updates, thought leadership, and marketing communications (where consent exists)
- Conducting assessments using our ICT Capability and Maturity Framework (ICMF)
- Improving our services, website, and internal processes
- Complying with legal and regulatory obligations

If you do not provide requested personal information, we may not be able to deliver specific services or respond to your enquiry.

6. Use and Disclosure of Personal Information

We use personal information only for the primary purpose for which it was collected, or for a related secondary purpose that you would reasonably expect.

We may disclose personal information to:

- Employees and contractors engaged in service delivery (on a need-to-know basis)
- Technology platform providers and cloud service operators that support our operations
- Professional advisers — legal, accounting, and insurance providers
- Regulators and government bodies where required by law

We do not sell, rent, or trade personal information to third parties for marketing purposes.

7. Direct Marketing

We may use your contact details to send you information about our services, insights, and events where you have consented or where we hold a reasonable expectation that such communications are welcome.

You may opt out of marketing communications at any time by:

- Clicking the unsubscribe link in any email communication
- Contacting us directly at privacy@farragan.com.au

We will action opt-out requests promptly and within a reasonable timeframe.

8. Cross-Border Disclosure of Personal Information

Some of our technology platforms and cloud services may store or process data outside Australia, including in the United States, Ireland, and Singapore.

Before disclosing personal information to an overseas recipient, we take reasonable steps to ensure that the recipient handles the information in a manner consistent with the APPs. In

some cases, we rely on contractual protections or certifications such as SOC 2 compliance held by our technology providers.

By engaging with us, you acknowledge that your information may be transferred to overseas recipients subject to these protections.

9. Government-Related Identifiers

We do not collect, use, or disclose government-related identifiers (such as Tax File Numbers or Medicare numbers) unless required by law or with explicit consent.

10. Quality of Personal Information

We take reasonable steps to ensure that personal information we hold is accurate, up to date, complete, and relevant. We rely on you to notify us of any changes to your personal information. You can update your details at any time by contacting us at privacy@farragan.com.au.

11. Security of Personal Information

We implement reasonable technical and organisational safeguards to protect personal information against misuse, interference, loss, and unauthorised access. These include:

- Access controls and multi-factor authentication for systems holding personal data
- Encryption in transit and at rest for sensitive information
- Regular security reviews aligned to our Security and Resilience service stream
- Confidentiality obligations for all personnel and contractors

When personal information is no longer required, we take reasonable steps to destroy or de-identify it securely.

In the event of an eligible data breach under the Notifiable Data Breaches (NDB) scheme, we will notify the Australian Information Commissioner and affected individuals as required by the Privacy Act.

12. Accessing Your Personal Information

You have the right to request access to personal information we hold about you. To make an access request:

- Contact us in writing at privacy@farragan.com.au
- Include sufficient detail to identify yourself and describe the information sought

We will respond within 30 days. We may charge a reasonable administrative fee for complex requests. In limited circumstances, we may decline access — if so, we will provide written reasons and information about how to complain.

13. Correcting Your Personal Information

If you believe that personal information we hold about you is inaccurate, incomplete, or out of date, please contact us at privacy@farragan.com.au. We will take reasonable steps to correct the information or, where we disagree, to note your request alongside the record.

14. Anonymity and Pseudonymity

Where practicable, you may interact with us anonymously or under a pseudonym — for example, when browsing our website or making a general enquiry. However, to deliver advisory services or respond to specific requests, we will generally need to identify you.

15. Cookies and Website Analytics

Our website uses cookies and third-party analytics tools (such as Google Analytics) to understand how visitors use our site. Cookies do not identify you personally unless you have provided us with personal information.

You may disable cookies in your browser settings. Doing so may limit the functionality of certain pages on our website.

16. Complaints and Concerns

If you believe we have mishandled your personal information or breached the APPs, please contact our Privacy Officer in the first instance:

Privacy Officer

Farragan Group

Email: privacy@farragan.com.au

We will acknowledge your complaint within 5 business days and aim to resolve it within 30 days. If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

- Website: www.oaic.gov.au
- Phone: 1300 363 992
- Post: GPO Box 5218, Sydney NSW 2001

17. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes to our practices or legal obligations. The current version will always be published on our website with an updated effective date. Material changes will be communicated directly to active clients.

18. Contact Us

For all privacy enquiries, access requests, or corrections, please contact:

Farragan Group Pty Ltd

New South Wales, Australia

Email: privacy@farragan.com.au

Website: www.farragan.com.au