Privacy Policy

How KODA collects, uses, stores and shares personal information, in line with the Australian Privacy Principles. For clients, suppliers, job applicants and website visitors.

Policy

KODA-POL-04, version 1.0

Effective 28 October 2026, next review October 2027

1. About this policy

KODA Design Australia Pty Ltd (ACN 606 217 083), trading as KODA, is a digital agency. This policy explains how we handle personal information.

As a small business, KODA may be exempt from the Privacy Act 1988 (Cth). We choose to follow the Australian Privacy Principles (APPs) anyway, and our clients' contracts often require it.

2. What we collect

We collect only the personal information we need. Depending on how you deal with us, this may include:

- names, job titles, email addresses, phone numbers and business addresses of clients, suppliers and their staff
- billing and payment details for invoicing
- information in project material clients give us, such as website content, photos and form submissions
- job applications, CVs and referee details
- for our own personnel, background check results when a client contract requires them
- website usage data collected through cookies and analytics tools, such as pages visited, device type and approximate location

We don't usually collect sensitive information. If we need it, we collect it only with your consent or where the law or a contract requires it.

3. How we collect it

Most information comes from you directly: by email, phone, in meetings, through our website forms or when you work with us. We may also receive it from our clients, or from public sources such as company websites and LinkedIn.

4. Why we use it

- to deliver, manage and invoice our services
- to answer enquiries and keep in touch about projects
- to assess job applications and engage personnel
- to meet our legal, insurance and contract obligations, including client audits and reporting
- to improve our website and services
- to send occasional news about our work. You can unsubscribe at any time.

5. Who we share it with

We don't sell personal information. We share it only when needed, with:

- our personnel and subcontractors, who are bound by confidentiality
- service providers that help us run the business, such as email, cloud storage, accounting, project management, web hosting and business-grade AI tools
- our clients, and the contract managers and funders of client projects, where a contract requires it
- our professional advisers and insurers
- government agencies or others when the law requires it

6. Overseas storage

Some of our service providers store data outside Australia, including in the United States. We use reputable providers with strong security and privacy commitments, and we take reasonable steps to make sure they protect your information in line with the APPs.

7. Information we handle for clients

When we build or maintain a website, we may handle personal information on our client's behalf, such as form submissions or newsletter sign-ups. We use it only to deliver the services in our contract. The client's own privacy policy covers how they use that information.

8. How we protect it

We use multi-factor authentication, encrypted devices, a password manager, regular updates, firewalls and tested backups, and we limit access to people who need it. Our Information Security and Records Policy sets out these controls in full.

We keep personal information only as long as we need it, or as long as the law or a contract requires. Business records are generally kept for seven years and then securely deleted.

9. Data breaches

If we suspect a data breach, we act quickly to contain it and assess the risk of harm. If it's likely to cause serious harm, we notify the people affected and the Office of the Australian Information Commissioner (OAIC), and we tell affected clients promptly.

10. Access and correction

You can ask to see the personal information we hold about you, or ask us to correct it. Contact us using the details below. We'll respond within 30 days and won't charge you for making a request.

11. Complaints

If you have a concern about how we've handled your personal information, please contact us first. We'll look into it and reply within 30 days.

If you're not satisfied with our response, you can complain to the OAIC at oaic.gov.au or on 1300 363 992.

12. Contact us

Kim Grantham, Account Manager (privacy contact)

Email: privacy@koda.au

Phone: 1300 661 557

Post: KODA Design, 26/1 Bligh Street, Sydney NSW 2000

13. Changes to this policy

We review this policy at least once a year. The current version is always on our website.