

Essential Personnel Online Privacy Policy

1 PURPOSE

The purpose of this policy is to:

- Give you a better and more complete understanding of the kinds of personal information that we collect and hold.
- Clearly and concisely communicate how and when your personal information is collected, disclosed, used, held, and otherwise handled by us.
- Inform you about the purposes for which we collect, hold, use, and disclose personal information.
- Provide you with information about how you may access your personal information and seek correction of your personal information.
- Provide you with information about how we may use your personal information for communications or marketing purposes.

2 POLICY STATEMENT

This policy sets out how we will comply with our obligations under the *Privacy Act 1988* (Cth) (Act). We are bound by the Australian Privacy Principles (APPs), which regulate how we may collect, use, disclose and hold your personal information, and how you may access and correct personal information held about you.

We will ensure that all our officers, employees and subcontractors are aware of and understand our obligations and their own obligations under the Act and are provided with training to enable them to fulfil these obligations.

We will also achieve this through maintaining internal policies and processes to prevent personal information being improperly collected, held, shared / exchanged, accessed, or disposed of.

3 WHAT IS PERSONAL INFORMATION?

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

It includes your name, date of birth / age, gender and contact details as well as health information (which is also sensitive information). In this privacy policy, a reference to personal information includes sensitive / health information.

3.1 Collection of personal information

We do not collect personal information unless it is reasonably necessary for, or directly related to, one or more of our functions or activities.

Personal information collected by us will usually fall into one of the following categories:

- Contact information (name, age, address, email address and telephone numbers).
- Commonwealth identifiers (e.g., CRN, TFN).
- Employment information (e.g., employment history, work performance, absences, workplace incidents, next of kin information).
- Financial information (e.g., bank account details).
- Sensitive information (e.g., health, medical history, criminal history, religious beliefs, trade union activity).
- Information obtained to assist in managing client and business relationships.

We may collect your information from you in a variety of ways including face-to-face, over the telephone, through an on-line form or portal, through a paper form or by email. Sometimes we will collect personal information from a third party or a publicly available source if it is unreasonable or impracticable to collect the personal information directly from you (e.g., checking a candidate's work history).

You may choose to deal with us anonymously or under a pseudonym where lawful and practical. Where anonymity or the use of a pseudonym will render us unable to provide the relevant service or reasonably conduct business, we may request that you identify yourself. For example, it would not be practical to deal with you anonymously if we are providing assistance in securing paid employment for or providing rehabilitative services to you.

Where personal information is sensitive information, we will only collect that information where:

- It is reasonably necessary for one or more of our functions,
- We have the individual's consent to the collection of that information, or
- We are required or authorised by law to collect the sensitive information.

3.2 Why do we collect, use, and store your personal information?

We collect, use and store your personal information to provide you with services including:

- Recruitment / Employment Services
- Employee Management
- Labour Market Research
- Occupational Safety and Health
- Insurance Claims and Assessments
- Training / Education
- Research
- Services under the National Disability Insurance Scheme
- Client and Business Relationship Management

We may also collect, use, and store your personal information for marketing purposes in order to inform you of the services we offer.

Our services, functions, and activities, as well as those of our contracted service providers, may change from time to time.

4 PROTECTING AND STORING YOUR PERSONAL INFORMATION

We are committed to keeping personal information secure and safe. Some of the ways we do this are:

- Requiring employees and contractors to enter into confidentiality agreements.
- Securing hard copy document storage (i.e., storing hard copy documents in locked filing cabinets).
- Security measures for access to computer systems to protect information from unauthorised access, modification or disclosure and loss, misuse, and interference.
- Password protected data storage devices such as laptops, tablets, and smart phones.
- Providing a discreet environment for confidential discussions.
- Access control for our buildings including waiting room / reception protocols and measures for securing the premises when unattended.

- Security measures for our website(s).

Essential Personnel reviews and updates these measures from time to time to ensure security is maintained.

Personal information may be stored in documentary form but will generally be stored electronically on our software or systems.

Although we take all reasonable steps to secure personal information from loss, misuse and unauthorised access, there is an inherent risk of loss of, misuse of or unauthorised access to such information. We will not be held responsible for such actions where the security of the personal information is not within our control or we cannot reasonably prevent such an incident, for example, a technical malfunction, computer virus, third party interference or any action or event that is beyond our reasonable control.

4.1 Who will we disclose your personal information to?

We will only use and disclose personal information for the primary purpose for which it was initially collected, or for purposes which are directly related to one of our functions or activities.

Like many other businesses in Australia, we contract out some of our functions and rely on third party suppliers or contractors to provide specialised services such as employment services, “cloud computing” technology and data storage services, legal advice, insurance broking, security services, business advisors and financial services. If personal information is provided to these suppliers, advisors, and contractors in order to enable them to perform the agreed tasks, we will take reasonable measures to ensure that the supplier, advisor or contractor handles the personal information in accordance with the Act and the APPs. For example, we require all suppliers, advisors, and contractors to provide privacy undertakings and enter into confidentiality agreements where they may have access to personal information.

We will not disclose your personal information to government agencies, private sector organisations or any third parties unless one of the following applies:

- You have consented.
- We believe that you would reasonably expect, or have been told, that information of that kind is usually passed to those individuals, bodies, or agencies.
- It is otherwise required or authorised by law.
- It is reasonably necessary for enforcement related activities conducted by, or on behalf of, an enforcement body (e.g. police, ASIC, Immigration Department).

5 COMMUNICATIONS AND MARKETING POLICY

We communicate with users who subscribe to our services on a regular basis via email, and we may also communicate by phone or SMS.

We may use your email address and phone number to:

- (i) confirm your information
- (ii) send notices and other disclosures as required by law or
- (iii) advise you of programs you are formally registered with and/or
- (iv) provide information about the services we provide.

Generally, users cannot opt out of these communications, which are not marketing related but merely required for the relevant business relationship.

We may also collect, use and store your personal information for marketing purposes in order to inform you of the services we offer. Part of delivering a high quality, personalised digital experience is recognising who we are talking to, so we can provide the services that you want from us.

To do that, we may need to request and store some of your personal information. We know your privacy is vital, so these details will only ever be used in accordance with the terms of this Privacy Policy.

Essential Personnel may also use your personal information for the purpose of marketing its services.

If you do not want to receive marketing material from us, you can contact us as detailed below:

- for electronic communications, you can click on the unsubscribe function in the communication or
- for hard copy communications, you can email marketing@essentialpersonnel.org.au

Cookies and other technologies are used by Essential Personnel on Essential Personnel's website and through email to automatically collect certain types of information. The collection of this information allows us to customise your online experience (including tailored Essential Personnel marketing), improve the performance, usability, and effectiveness of Essential Personnel's online presence and to measure the effectiveness of our marketing activities.

5.1 IP Address

An IP address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognise and communicate with one another.

Public IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to conduct website trend and performance analysis, and to personalise your user experience.

5.2 Cookies

Cookies may be placed on your computer or internet-enabled device whenever you visit us online. This allows the site to remember your computer or device.

Although most browsers automatically accept cookies, you can choose whether or not to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu). You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our website's features.

Cookies by themselves do not tell us your email address or otherwise identify you personally. In our analytical reports, we may obtain other identifiers including public IP addresses, but this is for the purpose of identifying the number of unique visitors to our website and geographic origin of visitor trends, and not to identify individual visitors.

5.3 Analytics Tools

Essential Personnel uses analytics tools, such as Google Analytics. Reports obtained from Google Analytics are used to help improve the efficiency and usability of this website.

Google Analytics uses first-party cookies and JavaScript code to gather statistics about how the Essential Personnel website is accessed. It anonymously tracks how our visitors interact with our website, including where they came from, what they did on the site including such things as news registration. No personal information is collected or stored by Essential Personnel or Google.

The information generated by the cookie and JavaScript code about your use of the website (including your IP address) will be transmitted to and stored by Google on servers located outside Australia. Google is based in the United States of America (USA). Should you wish to contact Google, you can find contact details on Google's Contact us page.

Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activity for website operators and providing other services relating to website activity and internet

usage. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

By using our website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. Relevant legislation of the USA will apply.

You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

5.4 Google Tag Manager

We use Google Tag Manager, a digital marketing service provided by Google Inc. ("Google"). Reports obtained from Google Tag Manager are used to help improve the efficiency and usability of the website by measuring traffic and visitor behaviour to the essentialpersonnel.org.au website.

Google Tag Manager uses tags which are tiny bits of website code that allow us to measure traffic and visitor behaviour, understand the impact of online advertising and social channels, use remarketing and audience targeting, test and improve our site. Google Tag Manager keeps track of a set of tags and tag-firing rules, but it does not collect any personally identifiable information.

When a user visits the site, the most up-to-date tag configuration is sent over to the end-user's browser with instructions to fire appropriate tags. The information generated about your use of the website (including your IP address) will be transmitted to and stored by Google on servers located outside Australia. Google is based in the United States of America (USA). Should you wish to contact Google, you can find contact details on Google's Contact us page.

By using our website, you consent to the processing of data about you by Google in the manner prescribed by Google's Privacy Policy and for the purpose set out above. Relevant legislation of the USA will apply. You can opt out of Google Analytics if you disable cookies, JavaScript, or use the opt-out service provided by Google.

5.5 Web beacons

A web beacon is a small image file on a web page that can be used to collect certain information from your computer, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server.

Essential Personnel or its service providers may use web beacons to track the effectiveness of third-party website that provide us with recruiting or marketing services or to gather aggregate visitor statistics and manage cookies.

You have the option to render some web beacons unusable by rejecting their associated cookies. The web beacon may still record an anonymous visit from your IP address, but cookie information will not be recorded.

In some of our newsletters and other communications, we may monitor recipient actions such as email open rates through embedded links within the messages. We collect this information to gauge user interest and to enhance future user experiences.

5.6 Location-based tools

Essential Personnel may collect and use the geographical location of your computer or mobile device. This location data is collected for the purpose of providing you with information regarding services which we believe may be of interest to you based on your geographic location, and to improve our location-based products and services.

5.7 Social media widgets and applications

Essential Personnel's website may include functionality to enable sharing via third party social media applications, such as the Facebook Like button and Twitter widget. These social media applications may collect and use information regarding your use of Essential Personnel's website. Any personal information that you provide via such social media applications may be collected and used by other members of that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.

In addition, Essential Personnel's website may host applications or services (collectively "social media features"). The purpose of social media features is to facilitate the sharing of knowledge and content. Any personal information that you provide on any Essential Personnel social media feature may be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we may have limited or no control.

5.8 Links to third party websites

Essential Personnel's websites may contain links to third parties' websites, including sites maintained by other Essential Personnel member firms. Those other websites are not subject to our privacy policy and procedures. You will need to review those websites to view a copy of their privacy policy.

Essential Personnel also does not endorse, approve or recommend the services or products provided on third party websites.

6 YOUR CHOICES

You have several choices regarding your use of Essential Personnel's website. In general, you are not required to provide personal information when you visit our website. However, if you apply to receive information about our services, register for services, events and updates or wish to apply for a job, provision of certain personal information will generally be required.

If you do not want to receive marketing material from us, you can contact us as detailed below:

- for electronic communications, you can click on the unsubscribe function in the communication or
- for hard copy communications, you can email marketing@essentialpersonnel.com.au

7 RELATED POLICIES

This policy relates to the following policies in use within Essential Personnel:

- COR-PO-007 - Privacy Policy Statement
- COR-PO-008 - Privacy, Dignity & Confidentiality Policy
- IT-PO-003 - Anti-Malware Policy
- COR-PO-012 - Code Of Conduct Policy
- IT-PO-006 - Information Security Policy
- IT-PO-005 - Information Security Policy for Supplier Relationships
- COR-PO-004 - Feedback and Complaints Policy
- COR-PO-001 - Rights Policy
- HR-PO-004 - Protective Disclosure (Whistle-Blower) Policy
- HR-PO-005 - Social Media Policy
- HR-PO-001 - Staff Grievance Policy



CHIEF EXECUTIVE OFFICER

14 March 2023

END OF DOCUMENT

Electronic documents, once printed, are uncontrolled and may become outdated.