

PRIVACY POLICY

1. PURPOSE

Civilex respects the privacy of its clients, Employees, perspective employees and all others in which it deals with. This policy describes the types of private data we collect and also describes how we use private information, with whom we share it, your rights and choices, and how you can contact us about our privacy practices.

2. DEFINITIONS

'APP' means Australian Privacy Principles.

'Civilex' means Civilex Victoria Pty Ltd and any other related company of the aforementioned companies.

'Employee' means a full time, part time, casual or volunteer employee of Civilex and includes directors, contractors and agents of Civilex.

'Personal Information' means information or opinion about an identified individual, or an individual who is reasonably identifiable.

'Sensitive Information' is personal information and includes information about an individual's health or genetics, racial or ethnic origin, political opinion or membership, religion, philosophical beliefs, union membership, sexual preference and criminal record.

3. RESPONSIBILITIES

Actions	Responsible Party
Implementation of policy and processes	Director
Complaints regarding privacy	HR Manager

4. POLICY

Civilex complies with the requirements of the *Privacy Act 1988* (Cth), which includes the APP, and where applicable State or Territory legislation relating to health information. This legislation regulates the collection, storage, quality, use and disclosure of personal and sensitive information and ensures that Employees are given certain rights in respect to this information

Civilex collects Personal Information, including Sensitive Information. Examples of the types of Personal Information we collect include names, addresses, other contact details such as email address, financial details such as a credit card number, transaction history and products and service preferences.

How do we collect your personal information?

We collect personal information in a number of ways and how we collect personal information from you will depend on how you use our services.

Sometimes we will collect this information directly from you. For example, we may collect personal information about you when you deal with us over the telephone, enter into an agreement with us or send us correspondence (whether by letter, fax or e-mail), visit our web site, you have contact with us in person or any other mode of communication.

We may also collect this information from a third party you have authorized to provide the information, or from a client or third party where it is unreasonable or impracticable to collect it from you.



How do we use and disclose your personal information?

We use and disclose personal information:

- for the purpose of dealing with your request, enquiry, contractual dealing or otherwise providing you with services,
- to contact clients, business contacts and individuals associated with providing services or business dealings with Civilex Victoria,
- to market our services, including through subscription services
- to assess job applicants
- to companies within Civilex group, or to service providers who assist us in operating our business. These organisations are required to comply with the principles of this policy.

Assessing and correcting personal information?

You may request access to personal information we hold about you and you may request corrections be made to that information.

We will generally provide you with access to any personal information we hold about you on request. In limited circumstances, however, access may be refused if required or permitted by law. If we do not provide you with access, we will explain the reasons for our refusal in writing.

We will not charge you for making an application to access your personal information but may charge a reasonable fee to cover the cost of giving access, such as photocopying costs. We will advise you if such a charge applies before your request is dealt with.

How we secure personal information?

Your personal information is held on databases and physical files. Civilex Victoria takes appropriate technical, organisation and physical measures to keep your personal information secure.

If Civilex Victoria outsources services involving the use of personal information, it will take steps to ensure the protection of your personal information.

Website

In the course of using our website, you may provide us with personal information. We take all reasonable steps to ensure its security within our own system.

Sending personal information overseas.

We do not send personal information overseas except where required for the purposes of providing services to a client.

Privacy Complaint Handling Procedure

This Privacy Complaint Handling Procedure sets out the process we will undertake to deal with complaints regarding breaches of Australian privacy law including under the Privacy Act and State and Territory legislation relating to health information.

Any complaints should be made in writing to Civilex HR Manager.

We will resolve all privacy complaints through this procedure:

Step 1: A privacy complaint is received (**Complaint**)

Step 2: Within (5) business days following receipt of the Complaint, Civilex Victoria will send a communication via post, fax or email to the person whom made the complaint (**Complainant**) acknowledging receipt of the Complaint.

Step 3: Following the acknowledgment of receipt of the Complaint (as outlined in Step 2), a Civilex Victoria investigator will notify the Complainant via post, fax or email, that they have been assigned to investigate the Complaint and commence the investigation.

Step 4: The investigator will conduct an investigation of the Complaint. During this process, the investigator may request further information from the Complainant.

Step 5: Within thirty (30) business days from the date all information is received, the Investigator will contact the Complainant, via post, fax or email, notifying the Complainant of proposed avenues of



resolution. The Complainant and the investigator may work together to collaboratively resolve the Complaint to the Complainant's satisfaction. Civilex Victoria will notify the individual if additional time is needed to respond due to the complexity of the inquiry.

Step 6: If the Complaint cannot be resolved by the Complainant and the Investigator in accordance with Step 5, then the Investigator will notify the HR Manager (Notification) who will then take steps to resolve the matter.

Step 7: Following receipt of all requested information, the HR Manager will contact the Complainant via post, fax or email, and propose an avenue(s) of resolution.

Step 8: If the Complainant agrees to the proposed avenue(s) of resolution, the Complainant and the HR Manager will work together to close the matter.

Step 9: In circumstances where resolution cannot be achieved in accordance with Steps 1 to 8, the HR Manager will advise the complainant that they may direct their Complaint to the Federal Privacy Commissioner or take independent advice as to their rights.

The Complainant may contact the Federal Privacy Commissioner as follows:

By telephone: 1300 363 992

By writing: Director of Complaints, Office of Federal Privacy Commissioner, GPO Box 5218, Sydney NSW 1042

By email: enquiries@oaic.gov.au

5. VARIATIONS

Civilex reserve the right to vary, replace or terminate this policy from time to time.