

## **Australian Employment Covenant**

### **PRIVACY POLICY**

#### **Introduction**

Australian Employment Covenant Pty Ltd (**AEC**) believes that privacy is an important individual right and is important to our own business and the businesses of our clients.

In this policy we set out the standards to which AEC is committed in ensuring the privacy of individuals. We are also bound to comply with the National Privacy Principles as set out in the *Privacy Act 1988*.

This document provides general information about our information handling practices.

#### **Collection of Personal Information**

AEC only collects personal information if it is necessary for our business purposes. The information we collect will depend on the purpose for which it is collected – it may be limited to contact details where we interact with the public (e.g. through the AEC website).

#### **Use of Personal Information**

We generally use personal information for the primary purpose for which it is collected. That may include providing advice or responding to an individual's request.

Depending on the purpose for which we have collected personal information, we may store some of the information in our company records. Some or all of this information may be available to partners and authorised staff of AEC for use in accordance with this policy.

Internally, we have controls and procedures to ensure that personal information provided to us remains confidential. All of our staff are trained in privacy and are bound by strict duties of confidentiality to AEC and its clients.

We will not collect or use personal information in ways other than as stated in this policy unless we have obtained an individual's consent. In some cases we may specifically request a consent form to be signed. In other cases, consent may be implied (for instance, where an individual gives us information after being fully advised of how it will be used).

#### **Disclosure of Personal Information**

We do not sell or trade personal information, or allow third parties to use that personal information for their own purposes.

If information needs to be accessed by a third party, we attempt to limit that access to the extent necessary for the third party to provide services to us or to perform its functions. We will ensure that those suppliers and contractors are also bound by duties of confidentiality, and by the same privacy obligations as AEC itself.

In all other cases, we will only disclose personal information to a third party if the disclosure is permitted by law (including under the National Privacy Principles).

We also ask our clients to confirm that they have made their own disclosures or obtained consents before they pass any personal information to us.

We may also transfer personal information where permitted under the National Privacy Principles.

## **Privacy on Our Website**

This policy applies equally to any personal information we collect via our website. Apart from personal information you provide to us intentionally (eg. where you make a request or complete a registration form), this section explains some other ways in which AEC collects information via its website.

AEC may from time to time provide links to websites operated by third parties. You should be aware that we are not responsible for the privacy practices or policies of those sites. We encourage you to review each website's privacy policy, especially if you intend to disclose any personal information via that site. A link to another third party website is not an express or implied endorsement, promotion or warranty of the products or services offered by or accessible through that site or advertised on that site.

## **Security of Personal Information**

AEC aims to achieve industry best practice in the security of personal information which it holds. It is our policy to destroy personal information once there is no longer a legal or business need for us to retain it.

## **Access to Information**

We will provide access to personal information upon request by an individual, unless a request is unreasonable and the National Privacy Principles would permit us to decline that access (for instance, where granting access would infringe another person's privacy).

Clients who wish to gain access to their personal information should contact AEC using the contact details set out in our website.

When you make a request to access personal information, we will require you to provide some form of identification (eg. driver's licence or passport) so we can verify that you are the person to whom the information relates. In some cases we may also request an administrative fee to cover the cost of access.

## **Corrections and Concerns**

If you believe that information we hold about you is incorrect, or if you have concerns about how we are handling your personal information then we ask that you contact us and we will try to resolve those concerns.

## **Effect of Policy**

This policy does not form a contract between an individual and AEC. The policy may also be subject to change. Whenever you need to refer to this policy you should contact us, or check our website, for the most up to date version.