

POLICY NUMBER: POL016:2**POLICY TITLE: PRIVACY**

Supersedes: POL016:1

Release Date: April 2018

Review Date: April 2019

1.0 PURPOSE AND SCOPE

The Skillset Board of Directors and employees are committed to providing the highest quality service which includes maintaining strict confidentiality in relation to client records, application records, and any other documents of a personal nature. The purpose of this Policy is to outline how this information is maintained.

The Privacy Act 1988 requires entities bound by the Australian Privacy Principles to have a privacy policy that embodies the 13 National Privacy Principles established under the Federal Privacy Law. This policy also covers the Privacy Amendment (Notifiable Data Breaches) Bill 2016 (Bill) that has been set up as a notification regime for eligible data breaches in Australia

2.0 POLICY**Overview**

This policy aims to ensure any information gathered by Skillset Limited is secure and confidential, disposed of appropriately, and that business processes are consistent with the Australian Privacy Principles.

This policy has been created to ensure that Skillset Limited:

- Treats as confidential all client and candidate information;
- Complies with all legal, statutory and Government requirements and abides by the requirements of our employment agent licence;
- Limits the use of any information obtained from clients or candidates to business purposes only;
- Protects the anonymity of clients or candidates until clearance for disclosure is obtained.
- That in the case where suspected data breaches occur that appropriate action and notification procedures are followed in compliance with relevant legislation.

We collect, hold, use and disclose personal information to carry out functions or activities as a Group Training Organisation, Recruitment & Work Placement provider, College, and Environmental & Sustainability service provider.

These functions and activities may include:

- work placement operations or recruitment functions
- client and business relationship management
- marketing or communicating services
- to confirm identity and authority to provide references
- statistical purposes and statutory compliance requirements

Collection of Personal Information

At all times Skillset Limited will only collect the information needed for the particular function or activity being conducted. The main way personal information is collected is directly from the person themselves. For example, Skillset Limited may collect personal information such as name, contact details, current employment details, education history, work history, resume, reference details and referee feedback when:

- when an employee's information is submitted electronically or in person
- an individual contacts Skillset Limited for information

Information may also be collected where personnel are participating in a meeting or in consultation with us.

Authorised by: Craig Randazzo

Position: CEO

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Collecting Sensitive Information

Sensitive information may be collected from time to time. This may include information about health, race or ethnic origin, association memberships, criminal history information.

Indirect Collection

Information from third parties and publicly available sources may be collected when necessary for a specific purpose such as checking information provide to Skillset Limited when an individual has consented or would reasonably expect us to collect this personal information in this way. For further information, refer to Social Networking Services in this Policy.

Collecting Through Our Websites

Where Skillset Limited's websites allow an individual to make comments or give feedback, we will collect email addresses and sometimes other contact details. We may use email addresses to respond to feedback. We may also store this personal information on servers located in Australia and offshore via iCloud.

Analytic, Session and Cookie Tools

Skillset Limited uses a range of tools provided by third parties, including Google to collect or view website traffic information. These sites have their own privacy policies. We use the information to maintain, secure and improve our websites. In relation to Google Analytics individuals can 'opt out' of the collection of this information using the Google Analytics Opt-out Browser Add-on.

Social Networking Services

Social networking services such as LinkedIn, Facebook, Twitter and YouTube are utilised by Skillset Limited to communicate with the public. Personal information may be collected through these, and social networking service may also handle personal information for its own purposes. These sites have their own privacy policies.

Email lists

Email addresses (and other contact details) may be collected when individuals subscribe to Skillset Limited's email lists. We only use this information for the purpose of communicating with individuals and to administer the lists.

How Personal Information is Held

Personal information is kept through a combination of secure computer storage facilities and other records. Skillset Limited takes such steps as are reasonable in the circumstances to protect the personal information from misuse, interference and loss, unauthorised access, modification or disclosure.

Records may be maintained for a significant period of time. However, when the information is no longer needed, we will remove any details that will identify an individual or we will securely destroy the records, provided that it is lawful for us to do so.

Data protection measures are never completely secure and, despite the measures Skillset Limited has in place, we cannot guarantee the complete security of personal information. Individuals must take care to protect their personal information (for example, by protecting any usernames and passwords). Skillset Limited must be notified of any possible security breaches. In line with the Privacy Amendment (Notifiable Data Breaches) Bill 2016 (Bill), introduced in February 2018, in situations where there is a suspected data breach the procedures as defined in SOP GOV002 "Mandatory Data Breach Notification Procedures" must be followed.

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Disclosure

We may disclose your personal information for any of the purposes for which it is held or for a lawful related purpose. Disclosure will usually be:

- Internally and to our related entities;
- To our clients; and / or
- To referees for suitability and screening purposes.

Related Purpose Disclosures

Skillset Limited outsource a number of services to contracted service providers (CSP) from time to time. Our CSP may see some of your personal information. Our CSP would include:

- Software solutions providers;
- I.T. contractors and database designers and internet service suppliers;
- Legal and other professional advisors;
- Background checking and screening agents;
- our related entities and related bodies corporate (as those terms are defined in the *Corporations Act 2001* (Cth); and
- Government agencies and departments when we are contractually or legally required to do so.

We take reasonable steps to ensure that terms of service with our CSPs recognise that we are bound by obligations to protect the privacy of personal information and that they will not do anything that would cause us to breach those obligations.

Disclosure of personal information overseas

Skillset Limited will not generally send personal information out of Australia. Where this is required by an individual, this will only occur with their consent. Where information is provided to these entities outside of Australia, we will no longer be required to take reasonable steps to ensure the overseas recipient's compliance with the Australian privacy law in relation to an individual's personal information and we will not be liable to for any breach of the Australian privacy law by these overseas recipients.

Web traffic information is disclosed to Google Analytics when you visit our websites. Google stores information across multiple countries. For further information see Google Data Centres and Google Locations.

When communication is Skillset Limited is conducted through social network services, the social network provider and its partners may collect and hold personal information overseas. These sites have their own privacy policies.

Access and Accuracy of Information

Should an individual wish to access their personal information, they are able to make enquiries, requests to access / delete or correct information.

Skillset may seek to confirm the accuracy of information from time to time. Individuals are required to comply with these requests.

Complaints

In accordance with Skillset Limited's Customer/Client Services Policy, we aim to acknowledge receipt of all complaints and aim to resolve all complaints within a timely manner. Where an individual is not satisfied with our response to a complaint, assistance from the Office of the Australian Information Commissioner (OAIC) can be sought.

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3.0 NON-COMPLIANCE

Failure to comply with the Policy may result in disciplinary action, up to and including the termination of employment.

Authorised by: Craig Randazzo

Position: CEO

Date: April 2018