

Privacy Policy

Job Futures Ltd ABN 13 080 037538 (trading as CoAct) is committed to protecting the privacy of the personal information we collect as part of the services we offer. CoAct is bound by the Law to comply with the *Privacy Act 1988* (Cth) (**Act**) including the Australian Privacy Principles (**APP**).

Purpose

This Privacy Policy provides CoAct with a clear understanding of its obligations regarding the collection, holding, use and disclosure by CoAct of personal information, including sensitive information relating to an individual, in accordance with the Law.

For individuals from whom we collect personal information, this Privacy Policy explains:

- The purposes for which we collect and hold personal information
- The kinds of personal information we may collect and hold
- How your personal information is collected, used, disclosed, held and managed by us
- How you may access your personal information or seek correction of your personal information if required
- How you may make a complaint about a breach of privacy.

Scope

This Policy applies to all CoAct directors, officers, employees, contractors and volunteers, who are engaged by CoAct and handle personal information collected by CoAct (**we, us**). It is the responsibility of every person within this scope to ensure they comply with the Policy.

The Policy applies to personal information we collect and hold for individuals who are external to us such as customers (job seekers and apprentices), staff of member organisations, service partners, employers, suppliers and other related third parties (**you, your**).

By providing your personal information to us, you consent to the use, storage and disclosure of that information as described in this Policy.

As both a Principal and Subcontractor of government funded employment services, CoAct collects/has access to customer personal information including sensitive information. We deal with this personal information in accordance with the obligations under Privacy legislation together with the Privacy requirements of the relevant program Deed (see references at end of Policy).

CoAct Service Partners delivering services under subcontract to CoAct are required to comply with Privacy legislation and the privacy requirements as set out in the Deed of the relevant service.

Policy

1. What is personal information?

Personal information refers to information or an opinion, in any form and whether true or not, about an identified individual or an individual who is reasonably identifiable. Examples include an individual's name; address, contact number and email address and can also include sensitive information such as cultural and health information and criminal records.

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

We collect, use and store relevant personal information in order to provide services to our customers, members, service partners, employers, suppliers and other related third parties. This includes:

- Engaging and providing customers and employers with Employment and Related Services
- To comply with the requirements of funding bodies as part of a funding agreement with us
- Marketing purposes in order to inform you of the services we offer
- Providing service partners with access to business systems
- Tender submission on behalf of service partners
- Business relationship management
- Providing relevant stakeholders with information about events and network activities
- Recruiting staff
- From time to time, CoAct may survey you on a range of issues to identify and analyse the ongoing needs of our stakeholders and the quality of our services and interactions with you. (See below – 6. How do we contact you)

3. What information do we collect and hold?

We only collect personal information about you that is reasonably necessary for, or directly related to, one or more of our business activities or functions.

This may include:

- Contact information (name, address, email address, telephone number etc.)
- Commonwealth Identifiers (e.g. JSID, CRN, TFN)
- Employment and education information
- Bank account details
- Sensitive information, such as health/medical history, cultural information, criminal history, police and working with children checks
- Personal information of “relevant persons” required to submit tenders on behalf of service partners
- Information to assist us in managing our business (e.g. employer information, potential member information).

4. Anonymity or use of pseudonym

You can choose to deal with us anonymously or under a pseudonym provided that it is lawful and practicable to do so. Where this will render us unable to conduct business with you or provide you with the service, we may request that you identify yourself.

5. How do we collect personal information?

We may collect personal information from you in a variety of ways, including face-to-face, by post, email, SMS, telephone call, paper form or via an on-line form or portal. We will collect your personal information:

- By lawful and fair means and not in an unreasonably intrusive manner
- Where it is reasonably necessary for one or more of our business activities or functions
- Directly from you, where it is reasonable and practicable to do so.

We only collect information about you from a third party or publicly available source where it is necessary for one or more of our business activities or functions.

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

- We have your consent to collect the information
- It is reasonably necessary to provide you with the service
- The collection of information is required or authorised by law.

6. Dealing with unsolicited personal information

We may receive unsolicited information from individuals or other sources. If we determine that we would not have collected the information for one or more of our functions or activities, we will take reasonably practicable steps to de-identify or destroy the information. Alternatively, we will take reasonable steps to protect the information from misuse or unauthorised disclosure. Disclosure of unsolicited information we hold may be made where required or permitted by law.

7. How do we contact you?

We may contact you in a variety of ways, including by post, email, SMS or telephone call or any other electronic means.

We will not send you any commercial electronic messages such as SMS or emails unless this is permitted by the Spam Act (for example, if we have your express or inferred consent to do so). Any commercial electronic message that we send will identify CoAct as the sender and will include our contact details. The message will also provide an unsubscribe facility. If you do not wish to receive commercial electronic messages from us, please let us know. Our contact details are also provided at the end of this policy.

8. Use and disclosure of personal information

We will use our best efforts to ensure that the information you provide to us remains private and is used only for the purposes you agree to and we will not sell or distribute your personal information to third parties.

We may, however, disclose the personal information we collect about you to third parties engaged by us to carry out, advise or assist with the carrying out of our business activities. These third parties may include our service partners, business partners, government agencies as required or authorised by law, contractors, financial institutions, payroll processing organisations, verification services, as well as any third parties that you have directly authorised to receive your personal information.

We do not use or disclose your personal information for the purpose of direct marketing of unrelated products or services.

We may also use and disclose your information for another purpose, where:

- You have consented
- You would reasonably expect us to use or disclose it for that purpose
- Use and disclosure is authorised by Australian law or a court/tribunal order
- We reasonably believe the use or disclosure is necessary to lessen or prevent a serious or imminent threat to the life, health or safety of the individual or public
- It is reasonably necessary for enforcement related activities conducted by, or on behalf of, an enforcement body.

9. Cross border disclosures

As per our responsibilities under our government employment services contracts, CoAct does not store any customer (job seekers and apprentices) personal data offshore.

For other general purposes, when we use third party cloud based technology for activities such as surveys, website analytics and campaign management, basic personal information may be stored in cloud servers not located in Australia. We will take reasonable steps to ascertain this and ensure any information stored in cloud servers not located in Australia is held, stored and dealt with consistently with the Australian Privacy Principles.

10. Quality of personal information

We will take reasonable steps to ensure that the personal information that we collect, store, use and disclose is accurate, complete and up to date. You are encouraged to help us keep your personal information accurate, complete and up to date by contacting us and informing us of any changes in your details. In the first instance you should speak with your usual point of contact in CoAct or via the contact details provided at the end of this policy.

11. Storage and security of personal information

We are committed to ensuring your information is safe and secure.

We have put in place suitable physical, electronic and managerial procedures to reasonably secure any information collected from you from misuse, interference or loss and in order to prevent unauthorised access to, modification or disclosure of that information. Some of the ways we do this include:

- Confidentiality requirements for our employees, contractors, volunteers
- Access control to premises
- Hard copy document storage and security practices
- Providing a discrete environment for confidential interviews
- Security measures for access to computer systems to protect personal information from unauthorised access, modification or disclosure, loss, misuse or interference
- Firewall protection for our systems
- Password protected data storage devices such as laptops, tablets and smart phones
- Encryption of personal data stored on laptops.

We will also take reasonable steps to destroy or permanently de-identify personal information if it is no longer required for any purpose.

12. Mandatory Notifiable Data Breaches

We have in place processes to comply with the notification and other requirements of the Notifiable Data Breaches (NDB) Scheme where your personal information held by us has been inadvertently lost or disclosed or improperly accessed and that loss, disclosure or access may result in serious harm to you.

13. Website privacy

In order to properly manage our websites and applications, we may log certain statistics about the users who visit these, for example the users' domains and browser types. This information does not specifically identify an individual and is used for statistical, reporting and website administration and maintenance purposes.

From time to time, our website may use 'cookies'. A cookie is a small piece of data sent from a website and stored in a user's web browser while the user is browsing that website. The cookie helps us to maintain the continuity of your browsing session and remember your details and preferences when you return. If you are concerned about cookies, most browsers recognise when a cookie is offered and permit you to opt out of receiving it or you can configure your web browser to reject cookies.

In addition, we use social media platforms, for example Facebook, LinkedIn, Twitter and YouTube. Any content or information you disclose on these sites may be viewed, collected and used by other users. CoAct is not responsible for the privacy practices or data collection methods used by these sites. Please refer to each platform's privacy statements.

14. Use of Commonwealth Government identifiers

Unless expressly authorised or required under the relevant Deed/Agreement we will not adopt a government related identifier as our own identifier of that individual or use or disclose a government related identifier of an individual.

15. Access to and correction of your personal information

If you wish to **access your personal information** held by us, in the first instance please speak with the staff member who is your usual contact who will outline options regarding your request.

Please note that requests under Freedom of Information for personal information held for government funded contracts will need to be referred to the funder.

Alternatively you may contact the CoAct Privacy Officer at the address below.

We will acknowledge your request within a reasonable period of time after the request being received, with full details of the process including the reasons (by Law) where we may not be able to give you access (Section 12.3 Australian Privacy Principles).

We will provide access to information within a reasonable period of time after the request is made, if it is reasonable and practicable to do so.

We may charge a reasonable fee for access to personal information.

You will need to verify your identity and authority before access to your personal information is granted.

Where we refuse to give you access we will provide the reason for the refusal in writing and the mechanisms available to complain about the refusal.

Correction of your personal information

If you request to correct the personal information we hold about you; we will take such steps (if any) as are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

Where we refuse to make changes to the information we hold about you we will provide the reason for the refusal in writing and the mechanisms available to complain about the refusal.

16. How to make a privacy complaint

If you have an enquiry or a complaint concerning collection, use or management of your personal information, please direct your enquiry to the staff member who is your usual contact who will outline options regarding how your enquiry or complaint may be resolved.

Alternatively you may contact the Privacy Officer, in writing on the details below.

Post: CoAct
PO Box K43
Haymarket NSW 2143
Attention: Privacy Officer

Email: integrity@coact.org.au

Phone: (02) 8281 2400

The complaints management process will be guided by the following principles:

- We will treat your enquiry or complaint confidentially;

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- The person making the complaint will be treated fairly and without fear of reprimand;
- The complaint will be acknowledged within 5 business days of receipt;
- Where an investigation is required, it will be objective, impartial, clearly documented and managed in accordance with this Privacy Policy;
- CoAct will attempt to provide a written response to all complaints within 14 days. More complex complaints may require more time to investigate and in such circumstances CoAct will communicate the revised timeframe expectations.

You may contact the **Australian Information Commissioner** wherever you believe that your rights to privacy have been breached by us. (www.oaic.gov.au)

| Related Documents | |
|-------------------|---|
| Related Processes | Data Breach Response Plan |
| Forms | - |
| Related Policies | Complaints Policy Employee Records Privacy Policy |
| Deed References | <ul style="list-style-type: none"> • Chapter A3 of the jobactive Deed 2015-2020 • Sections 3C and 3D of the Disability Employment Services Deed 2018 - 2023 • Sections 20 and 21 of the Australian Apprenticeship Support Network Contract July 2015 • Chapter A3 of the TTW Deed 2016-2020 • Clauses 17, 20, 22, 28 & 29 of Smart, Skilled & Hired – Youth Employment Program Services Deed 2017 – 2020 • Clause 29 of the Careers Transition Deed 2019 - 2022 |
| Other References | Privacy Act 1988 (Privacy Act) Australian Privacy Principles Schedule 1, Privacy Act 1988 (Privacy Act) Notifiable Data Breaches (NDB) Scheme Part IIIC of the <i>Privacy Act 1988</i> (Privacy Act) |

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