



Privacy Policy

December 2014



Intelligent
Pathways

www.intelligentpathways.com.au



Contents

1	Introduction	3
2	What is personal information?	3
3	Employee records	3
4	Kinds of information collected and held	3
5	How personal information is collected and held	4
6	Purpose of using personal information	5
7	Disclosure of personal information	6
8	Access to personal information	6
9	Correction of personal information	6
10	Integrity and security of personal information	6
11	Anonymity and Pseudonymity	7
12	Complaints	7
13	Privacy Officer Contact details	7

Published by Intelligent Pathways © Australia 2014

This work is copyright. Apart from any use as permitted under the Copyright Act 1968, no part may be reproduced by any process without prior written permission from Intelligent Pathways.

Disclaimer

While reasonable efforts have been made to ensure that the contents of this publication are factually correct, Intelligent Pathways does not accept responsibility for the accuracy or completeness of the contents, and shall not be liable for any loss or damage that may be occasioned directly or indirectly through the use of, or reliance on, the contents of this publication.



1 Introduction

From time to time Intelligent Pathways is required to collect, hold, use and/or disclose personal information relating to individuals (including, but not limited to, its customers, contractors, suppliers and employees) in the performance of its business activities.

This document sets out the Intelligent Pathways policy in relation to the protection of personal information, as under the Privacy Act 1998 (Cth) the ("Act") and the Australian Privacy Principles ("APP").

The APPs regulate the handling of personal information.

2 What is personal information?

Personal information means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

3 Employee records

This policy does not apply to the collection, holding, use or disclosure of information that is part of an employee record.

An employee record is a record of personal information relating to the employment of an employee. Examples of personal information relating to the employment of the employee include, but are not limited to, health information and information about the engagement, training, disciplining, resignation, termination, terms and conditions of employment of the employee. Please see the Act for further examples of employee records.

4 Kinds of information collected and held

Intelligent Pathways collects personal information that is reasonably necessary for one or more of its functions or activities.

The type of information that Intelligent Pathways collects and holds may depend on the relationship the party has with Intelligent Pathways. For example:

- a) Candidate: a candidate seeking employment with Intelligent Pathways may have information about them collected and held including name, address, email address, contact telephone number, gender, age, employment history, references, resume, medical history, emergency contact, taxation details, qualifications and payment details.
- b) Customer: a customer of Intelligent Pathways may have information about them collected and held including name, address, email address, contact telephone number, gender and age.
- c) Supplier: a supplier of Intelligent Pathways may have information about them collected and held including name, address, email address, contact telephone number, business records, billing information and information about goods and services supplied.
- d) Referee: a referee of a candidate being considered for employment by Intelligent Pathways may have information about them collected and held including name, contact details, current employment information and professional opinion of the candidate.



Intelligent Pathways will only collect sensitive information where you consent to the collection of the information and the information is reasonably necessary for one or more of Intelligent Pathways' functions or activities. Sensitive information includes, but is not limited to, information or an opinion about racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, membership of a trade union, sexual preferences, criminal record, health information or genetic information.

5 How personal information is collected and held

Intelligent Pathways must collect personal information only by lawful and fair means. Intelligent Pathways will collect personal information directly from you if it is reasonable or practicable to do so.

Intelligent Pathways may collect personal information in a number of ways, including without limitation:

- a) through application forms;
- b) by email or other written mechanisms;
- c) over a telephone call;
- d) in person;
- e) through transactions;
- f) through our website;
- g) through surveillance camera;
- h) by technology that is used to support communications between us;
- i) through publicly available information sources (which may include telephone directories, the internet and social media sites);
- j) direct marketing database providers;

When Intelligent Pathways collects personal information about you through publicly available information sources, it will manage such information in accordance with the APPs.

At or before the time or, if it is not reasonably practicable, as soon as practicable after, Intelligent Pathways collects personal information, Intelligent Pathways must take such steps as are reasonable in the circumstances to either notify you or otherwise ensure that you are made aware of the following:

- a) the identity and contact details of Intelligent Pathways;
- b) that Intelligent Pathways has collected personal information from someone other than you;
- c) which personal information is required to be collected by Australian law;
- d) the purpose for which Intelligent Pathways collects the personal information;
- e) the consequences if Intelligent Pathways does not collect some or all of the personal information;
- f) any other third party to which Intelligent Pathways may disclose the personal information;



- g) Intelligent Pathways privacy policy contains information about how you may access and seek correction of personal information held by Intelligent Pathways and how you may complain about a breach of the APPs; and
- h) whether Intelligent Pathways is likely to disclose personal information to overseas recipients, and the countries in which those recipients are likely to be located.

Unsolicited personal information is personal information that Intelligent Pathways receives which it did not solicit. Unless Intelligent Pathways determines that it could have collected the personal information in line with the APPs or the information is contained within a Commonwealth record, it must ensure that the information is destroyed or de-identified.

6 Purpose of using personal information

Intelligent Pathways will collect and use personal information if it is reasonably necessary for one or more of its functions or activities.

The main purposes for which Intelligent Pathways may collect, hold, use and/or disclose personal information may include but are not limited to:

- a) recruitment functions;
- b) customer service management;
- c) training and events;
- d) surveys and general research; and
- e) business relationship management.

Intelligent Pathways may also collect, hold, use and/or disclose personal information if you consent or if required or authorised under law.

Direct marketing:

- a) Intelligent Pathways may use or disclose personal information (other than sensitive information) about you for the purpose of direct marketing (for example, advising you of new goods and/or services being offered by Intelligent Pathways).
- b) Intelligent Pathways may use or disclose sensitive information about you for the purpose of direct marketing if you have consented to the use or disclosure of the information for that purpose.
- c) You can opt out of receiving direct marketing communications from Intelligent Pathways by contacting the Privacy Officer in writing or if permissible accessing Intelligent Pathways website and unsubscribing appropriately.



7 Disclosure of personal information

Intelligent Pathways may disclose your personal information for any of the purposes for which it is was collected, as indicated under clause 6 of this policy, or where it is under a legal duty to do so.

Disclosure will usually be internally and to related entities or to third parties such as contracted service suppliers.

Before Intelligent Pathways discloses personal information about you to a third party, Intelligent Pathways will take steps as are reasonable in the circumstances to ensure that the third party does not breach the APPs in relation to the information.

8 Access to personal information

If Intelligent Pathways holds personal information about you, you may request access to that information by putting the request in writing and sending it to the Privacy Officer. Intelligent pathways will respond to any request within a reasonable period, and a charge may apply for giving access to the personal information.

There are certain circumstances in which Intelligent Pathways may refuse to grant you access to the personal information. In such situations Intelligent Pathways will give you written notice that sets out:

- a) the reasons for the refusal; and
- b) the mechanisms available to you to make a complaint.

9 Correction of personal information

If Intelligent Pathways holds personal information that is inaccurate, out-of-date, incomplete, irrelevant or misleading, it must take steps as are reasonable to correct the information.

If Intelligent Pathways holds personal information and you make a request in writing addressed to the Privacy Officer to correct the information, Intelligent Pathways must take steps as are reasonable to correct the information and Intelligent Pathways will respond to any request within a reasonable period.

There are certain circumstances in which Intelligent Pathways may refuse to correct the personal information. In such situations Intelligent Pathways will give you written notice that sets out:

- a) the reasons for the refusal; and
- b) the mechanisms available to you to make a complaint.

If Intelligent Pathways correct personal information that it has previously supplied to a third party and you request us to notify the third party of the correction, Intelligent Pathways will take such steps as are reasonable to give that notification unless impracticable or unlawful to do so.

10 Integrity and security of personal information

Intelligent Pathways will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information it:

- a) collects is accurate, up-to-date and complete; and



- b) uses or discloses is, having regard to the purpose of the use or disclosure, is accurate, up-to-date and complete.

Intelligent Pathways will take steps as are reasonable in the circumstances to protect the personal information from misuse, interference, loss and from unauthorised access, modification or disclosure.

If Intelligent Pathways holds personal information that is determined to be no longer needed for any purpose including retention by law, it will take reasonable steps to destroy the information or to ensure it is de-identified.

11 Anonymity and Pseudonymity

You have the option of not identifying yourself, or using a pseudonym, when dealing with Intelligent Pathways in relation to a particular matter. This does not apply:

- a) where Intelligent Pathways is required or authorised by or under an Australian law, or a court/tribunal order, to deal with individuals who have identified themselves; or
- b) where it is impracticable for Intelligent Pathways to deal with individuals who have not identified themselves or who have used a pseudonym.

However, in some cases if you do not provide Intelligent Pathways with your personal information when requested, Intelligent Pathways may not be able to respond to your request or provide you with the goods or services that you are requesting.

12 Complaints

You have a right to complain about Intelligent Pathways' handling of your personal information if you believe Intelligent Pathways has breached the APPs.

If you wish to make a complaint to Intelligent Pathways, you should first contact the Privacy Officer in writing. Your complaint will be dealt with in accordance with Intelligent Pathways' complaints procedure and Intelligent Pathways will provide a response within a reasonable period.

If you are unhappy with Intelligent Pathways' response to your complaint, you may refer your complaint to the Office of the Australian Information Commissioner.

13 Privacy Officer Contact details

Intelligent Pathways' Privacy Officer, Simon McCabe, can be contacted in the following ways:

- a) Phone: 07 3852 5228
- b) Email: simon.mccabe@intelligentpathways.com.au
- c) Postal address: PO BOX 10300, Adelaide Street, Brisbane, QLD 4000



Brisbane
Level 2, 549 Queen Steet
Brisbane QLD 4000
T +61 7 3852 5228 F +61 7 3852 5229

Sydney
Level 2, 61 York Street
Sydney NSW 2000
T +61 2 9966 1156 F +61 2 9299 6575

Integrated Thinking
www.intelligentpathways.com.au