



# Privacy Policy

## IPIS-06

—  
**Date.**

January 2021

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**Data Classification**

<b>PUBLIC</b>
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# 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 APP Guidelines regulate the handling of personal information.

## 2 What is personal information?

Personal information is defined as any information or an opinion about an identified individual or an individual who is reasonably identifiable. This information or opinion may or may not be true or recorded in a material form.

## 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 individual has with Intelligent Pathways. For example:

- **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.
- **Customer:** a customer or potential customer of Intelligent Pathways may have information about them collected and held including name, address, email address, contact telephone number, gender and age.
- **Visitor:** a visitor to our offices or our websites may have information about them collected and held including name, email address, job title and website activity.
- **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.
- **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:

- through application forms
- by email or other written mechanisms
- over a telephone call
- in person
- through transactions
- through our website
- through surveillance camera
- by technology that is used to support communications between us
- through publicly available information sources
- 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:

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

### 5.1 Cookies

Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide us with personal information, this information may be linked to the data stored in the cookie.



We use cookies for the following reasons:

- Operations: cookies required for the operation of our website/s e.g. for login purposes
- Analytics and Performance of our websites: for recognising and counting the number of visitors and how they use the website/s
- Functionality: to recognise you when you return to our website/s. This helps us remember any use preferences you have and helps us personalise any communications to you.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

We may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) or any other URL Google may use from time to time.

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

- recruitment functions
- customer service management
- training and events
- surveys and general research
- business relationship management
- direct marketing and tailoring communications

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

### 6.1 Direct Marketing

Intelligent Pathways may use or disclose personal information (other than sensitive information) about you for the purpose of direct marketing and tailoring communications to better align to your needs (for example, providing information relating to goods and/or services being offered by Intelligent Pathways).

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.

You can opt out of receiving direct marketing communications from Intelligent Pathways by utilising 'opt out' or 'unsubscribe' functions provided on communications or our website, or by contacting the Privacy Officer.

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.

## 7 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:

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

## 8 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:

- the reasons for the refusal; and
- 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.

## 9 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.



## 10 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.

## 11 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.

## 12 Privacy Officer Contact details

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

- Phone: 07 3852 5228
- Email: [simon.mccabe@intelligentpathways.com.au](mailto:simon.mccabe@intelligentpathways.com.au)
- Postal address: PO BOX 10300, Adelaide Street, Brisbane, QLD 4000



<b>Brisbane</b> Level 8, 500 Queen Street Brisbane QLD 4000	<b>Sydney</b> 333 George St Sydney NSW 2000	<b>Melbourne</b> 21 David St Richmond VIC 3121
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