

Privacy

Your obligations

As a staff member of C|T, you are required to act in accordance with our Privacy Statement at all times. That Statement is set out below, and is also available to the public on our website.

A statement about privacy:

The C|T Group aims to protect the privacy of the personal information that we collect and hold whilst carrying out our activities. Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

This statement applies to personal information collected from and about staff, customers, suppliers and any other person whose personal information the C|T Group may collect from time to time.

The C|T Group is bound by the *Privacy Act 1988* (Cth) (Act). This statement has been developed as part of the C|T Group's efforts to comply with its obligations under that legislation, including compliance with the Australian Privacy Principles (APPs) contained in the Act.

This statement explains:

- what types of personal information we might collect;
- how we aim to use personal information;
- when we will disclose personal information to others;
- how we manage and secure personal information;
- how you can access and seek to correct personal information that we hold about you; and
- how you may make a complaint if you think that we have breached the APPs.

This statement does not form part of any contract.

From time to time, we may review and update this statement – for example, to reflect changes to the law, technology or our company. You should check this statement, which is posted on our website, and updated periodically, to read about any changes, modifications, or revisions to this statement.

Exception in relation to employee records

The APPs do not apply to employee records, as that term is defined by the Act. As a result, this statement does not apply to the C|T Group's treatment of employee records, where the treatment is directly related to a current or former employment relationship between the C|T Group and an employee.

1. What types of personal information do we collect?

The C|T Group aims only to collect 'personal information' (as defined under the Act) that is reasonably necessary for its activities. The types of personal information that we collect will

depend on the nature of the interaction between you and the C|T Group, and where and how we collect the information.

Personal information collected by the C|T Group includes:

- information about clients including names, addresses, email addresses, telephone and fax numbers and other contact details and also information about their use of the C|T Group's services;
- information about job applicants, staff members, volunteers and contractors; and
- details of other people who come into contact with the C|T Group such as suppliers.

You have the option of not identifying yourself, or of using a pseudonym, when dealing with the C|T Group in relation to certain matters. We will let you know when we require you to identify yourself. If some information that the C|T Group requests is not provided, the C|T Group may not be able to or engage you to work at the C|T Group.

Some of the information we collect is 'sensitive information' (as defined under the Act), including information about your racial or ethnic origin, religious beliefs or affiliation, or health. The Act requires us only to collect sensitive information from you where this is consented to by you and reasonably necessary for our activities, or if the collection is required by law or a court or tribunal order, and only to share personal information including sensitive information if the C|T Group has a belief that its use and/or disclosure is necessary:

- to lessen or prevent threats to health, life or safety of any individual;
- to investigate unlawful activity or serious misconduct within its the C|T Group;
- to assist enforcement bodies, such as the police, with their activities;
- to assist in locating a missing person;
- to establish, exercise or defend a legal or equitable claim; and/or
- for the purpose of confidential alternative dispute resolution and/or
- for health-related research.

2. How do we collect your personal information?

We usually collect personal information directly from you, for example when you send us correspondence by e-mail or in writing, deal with us over the telephone or in person, or contact us, make a donation or place an order through our website. We do not collect personal information from visitors on our website other than what is supplied to us on a voluntary basis.

Sometimes, someone else may provide us with personal information about you, with or without your direct involvement. For example, we might collect your personal information from:

- another organisation of which you are a member;
- a representative;
- publicly available sources of information (such as telephone directories); or
- commercially available mailing and marketing lists.

3. How do we use your personal information?

Information of customers and suppliers

Personal information is collected from customers and suppliers to enable the C|T Group to conduct its business. The purposes for which the C|T Group uses personal information of customers and suppliers include:

- to provide them with its services and/or products;
- to provide ongoing support or help to manage products, for example if they have a query;
- to communicate with them;
- to provide information about other products or services that the C|T Group considers would interest them (which they can tell the C|T Group not to do at any time);
- to help the C|T Group run its business/activities, for example to improve its products or services or its security, train staff or undertake marketing activities; and
- to comply with its legal obligations.

If we collect your personal information for any other purpose, we will generally let you know that purpose at the time we collect the information.

Information of job applicants, staff members and contractors

The C|T Group collects personal information of job applicants, staff members and contractors for the primary purpose of assessing and (if successful) engaging the applicant, staff member or contractor, as the case may be.

The purposes for which the C|T Group uses personal information of job applicants, staff members and contractors include:

- managing the individual's employment or engagement;
- insurance purposes;
- ensuring that it holds relevant contact information; and
- satisfying its legal obligations.

Information of volunteers

The C|T Group also collects personal information about volunteers who assist the C|T Group, to enable the C|T Group and those volunteers to work together.

4. When will we disclose your personal information to others?

The C|T Group aims to confine its disclosure of personal information to the primary purpose for which it has been collected, or for a related purpose. This means the C|T Group will usually only disclose personal information in connection with its business and administrative functions, including when disclosure is necessary to provide you with a product or service that you have requested; help us with the running of our organisation; or for security reasons.

Sometimes we may also disclose your personal information outside the C|T Group for the

purpose for which the information was collected, or for a related purpose – for example when disclosure is necessary for publicity purposes - complete a transaction on your behalf, provide you with a product, service or activity you have requested, help us with the running of our organisation, or for security reasons.

We may provide your personal information to:

- companies related to the C|T Group that are located overseas, including, but not limited to: the United Kingdom, The United States of America, Italy and New Zealand
- outsourced service providers who perform functions on our behalf, such as organisations providing security services, conducting market research, providing email and mail handling services;
- authorised agents and representatives of the C|T Group who sell products or provide services on our behalf;
- anyone authorised by you to receive your personal information (your consent may be express or implied and can be withdrawn at any time);
- an actual or prospective purchaser in the event we sell part of our business; and
- anyone to whom we are required by law to disclose personal information.

We generally require third parties only to use your personal information for the specific purpose for which it was given to us and to protect the privacy of your personal information. We will only disclose your personal information to third parties on the basis that such parties agree with the C|T Group to keep your information confidential.

Consent

You consent to us disclosing your personal information to the third parties listed above for all the purposes listed above, and similar organisations. You can ask not to receive communications from us at any time by contacting us – contact details are set out at the end of this statement.

If you do not permit the disclosure of some personal information as the C|T Group requests, the C|T Group then may not be able to meet its legal obligations and may not be able to do business with you or engage you to work at the C|T Group. If this is the case, we will let you know.

Sending information overseas

There may be circumstances in which we will disclose personal information that we hold about you to a third party overseas (Overseas Recipients). This may occur, for example, where we have a database or server hosted outside Australia or where you are interacting with an application which is based overseas.

Before we disclose your personal information to an Overseas Recipient, we have an obligation to take reasonable steps to ensure that the Overseas Recipient does not breach the APPs in relation to your personal information.

The countries to which we are most likely to send your personal information include: The United Kingdom, the United States of America, Italy and New Zealand.

The C|T Group website

When you visit the public pages of our website, our website server makes a record of your visit and logs the following information;

- your IP ('Internet Protocol') address (which, in general terms, is a unique identifier assigned to your computer when it is connected to the Internet);
- search terms used;
- the operating system and Internet browser software you are currently using; and
- the data that you download (such as web pages or other document files or software), and the time that you download it.

This information cannot be used to identify you and is only used for statistical purposes to help us identify what parts of our website our users visit the most, which in turn assists us to determine how to improve our services.

If you contact us through our website or email us, the C|T Group will only use your personal information to respond to your request or answer your queries. We will not add your email address to our mailing list without your consent.

The C|T Group uses 'cookies' in the secure section of our website, which are a mechanism to keep track of certain information between visits to the site by the same user. Our website uses cookies to make the browsing experience more responsive when accessing some services on the website. This information is not linked to any personal information and cannot be used to identify the user. This means that the C|T Group's obligations in relation to personal information do not apply to the information that it collects via cookies.

You can adjust your web browser's settings to detect or disable cookies if preferred.

Other websites

To the extent that our website contains links to sites operated by third parties, including other organisations, those linked websites are not controlled by us and we are not responsible for the privacy practices of the site operators. Before you disclose your personal information to any linked websites, we advise you to examine their privacy policies and terms and conditions of use.

5. How we manage and secure personal information

We have appointed the office administrator to be responsible for the management of personal information that we collect. The C|T Group staff are required to respect the confidentiality of all personal information and the privacy of individuals, and we have directed our staff that personal information must be dealt with in accordance with this statement.

The C|T Group has security systems in place which are intended to protect your personal information from misuse, loss, unauthorised access, modification or disclosure by the use of various methods including locked storage of paper records and passworded access rights to computerised records.

If the C|T Group receives personal information about you which it did not request and which it does not reasonably require, the C|T Group may destroy or de-identify this information where appropriate.

If you reasonably believe that there has been an unauthorised use or disclosure of your personal information, please let us know by contacting your Managing Director

6. Updating personal information that we hold about you

The C|T Group aims to keep all personal information that we hold accurate, complete and up-to-date. We encourage you to tell us if you change your contact details. If you believe that the information we hold about you is incorrect, incomplete or out-of-date, please contact [insert name or position].

The C|T Group is required by law to keep some types of information for certain periods of time. If we no longer require your personal information, we will generally destroy or de-identify that information. The C|T Group reserves the right to retain information for a period longer than that for which it is required to retain the information if the C|T Group considers that it is necessary, and as long as it is in accordance with the APPs.

7. How you can access personal information that we hold about you

Under the Act, an individual generally has the right to obtain access to any personal information which the C|T Group holds about him/her and to advise the C|T Group of any perceived inaccuracy in that information. There are some exceptions to this right.

In some circumstances, the Act entitles the C|T Group to deny access, for example if providing access would impact unreasonably on the privacy of others or prejudice negotiations in which we are involved. If we do refuse access, we will generally let you know the reasons for our refusal.

If you make a request for access to your personal information, we may ask you to verify your identity and specify what information you require. The C|T Group may charge a fee to cover our costs of locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the C|T Group will generally advise the likely cost in advance. To make a request to access any information that the C|T Group holds about you, please contact your Managing Director in writing.

8. Questions or complaints

If you have any questions or would like to make a complaint about the C|T Group's compliance with the Act, please contact David Bell, Group Managing Director Australasia, Level 26, Governor Macquarie Tower, 1 Farrer Place, Sydney NSW 2000, [REDACTED], telephone [REDACTED], in writing.

If your personal information has not been handled in an appropriate way, we will do our best to remedy your concerns quickly, including by acknowledging receipt of your complaint in a timely manner and trying to resolve the complaint within a reasonable period. If this is not possible, we will contact you to let you know an anticipated time frame for dealing with your

complaint.

If your complaint is not satisfactorily resolved, you may approach an external dispute resolution service or apply to the Office of the Australian Information Commissioner (OAIC) to have the complaint heard and determined.