

Banjar Group Privacy Policy

1. PURPOSE

This policy deals with the protection of information about Banjar Group, our employees and registered candidates. It also aims to ensure we meet our commitment to the Privacy Act (amendment March 2014). It explains the type of information that Banjar Group collects, how and when information is used and to whom it is disclosed.

2. SCOPE

- a. This policy applies to all organization's employees, management, associates, contractors, candidates, student interns, and volunteers.
- b. This policy describes the organization's objectives and policies regarding maintaining the privacy of patient information.
- c. Banjar Group and any subsidiaries (Natural Selection)
- d. Banjar Group as a small business enterprise is committed to the information privacy principles.

3. REFERENCES

- a. Privacy Act (all amendments)
Australian Privacy Principles

4. RESPONSIBILITIES

- a. Executives/Management
 - 1) Establish program objectives
 - 2) Approve privacy policy
 - 3) Provide training for work force
 - 4) Designate Privacy Official

Privacy Official

- 1) Develops privacy policies and procedures
- 2) Coordinates and implements policy through organisation
- 3) Oversees training
- 4) Receives and processes privacy complaints
- 5) Processes individual rights requests

- a) Right to access/copy protected information



- b) Right to amend information
 - c) Right to restrict use/disclosure
 - d) Right to confidential communications
 - e) Right to an accounting of disclosures
 - f) Right to file a complaint
- 6) Ensures retention of Banjar Group policies and procedures, complaints, and investigative materials to meet compliance requirements.

Director, Training

- 1) Develops and implements privacy training
- 2) Documents the delivery of privacy training to all work force members

Employee responsibilities

- 1) Understand and comply with organization's policies regarding confidentiality and privacy

5. DESIGNATED RECORD SET

- b. Register Client Data Base
- c. Register Candidate Data Base
- d. CV File
- e. Marketing File and distribution

6. COLLECTION OF PERSONAL INFORMATION

Any personal information you supply will only be used by Banjar Group to conduct business. Unless required for legitimate business purposes, we will not collect any personal information from you revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or details of health disability or sexual activity or orientation.

In the collection of personal information Banjar Group will:

- a. Only collect information for lawful purposes as reasonably necessary.
- b. Only seek information, where reasonably possible, from the individual it relates to.
- c. Ensure that when it is obtained from a third party, information is made available to the person it relates to.
- d. State how it will be used and who will receive it.
- e. State if the collection is voluntary, and the consequences for individuals if it is not, or only in part, provided.
- f. Provide to the individual contact details of who to contact to access or correct their information.
- g. Takes reasonable steps to ensure information is relevant, accurate, up to date, complete and not excessive in volume, and does not unreasonably intrude on the personal affairs of an individual.
- h. Retain information no longer than necessary, and then dispose of it lawfully and securely.

- i. Always identify itself as Banjar Group and not pose as any other company or individual in order to obtain information.
- j. Take reasonable steps to protect information from loss, unauthorized access, use, modification, disclosure or other misuse.
- k. Take all reasonable steps to ensure information is not used or disclosed externally without authorization except where:
 - The individual has consented or been notified
 - Banjar Group is required by legislation, court order or other legally enforceable method and the request is in an appropriate written form or
 - It is reasonably believed necessary to prevent or lessen a serious and imminent threat to the life or health of an individual.
- l. Ensure all information remains in Australia unless:
 - It reasonably believes the recipient of the information is subject to a statute or contract that effectively upholds the principles for fair information handling that are substantially similar to this policy or the Privacy Act (Private sector – all amendments).
 - The individual concerned consents to the transfer
 - It is necessary for the performance of a contract between the individual and Banjar Group, or for pre-contractual measures taken in respect to the individual's request or
 - It benefits the individual and under normal circumstances the individual would consent.

7. REGISTRATION FORMS

For certain applications, our registration forms require users to give contact information (like name and email address and telephone number), and unique identifiers. For example, when applying to register as a candidate we will collect details such as your name, email address, age, sex and some details of your areas of expertise and education qualifications. Some of this information is essential for us to be able to match you to the position descriptors for roles.

8. ELECTRONIC PRIVACY AND SECURITY

Collection of information when you visit our website.

When you visit our website, our Internet service provider makes a record of your visit and logs the following information for statistical purposes:

- the user's server address;
- top-level domain name (example .com, .gov, .au etc);
- date and time of visited; and
- the type of browser used.

From time to time Banjar Group may monitor the use of browser activity, including in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect our Internet service



provider's logs. In this instance, statistics and log files may be kept indefinitely and use to prevent security breaches or to ensure the integrity of the information supplied to Banjar Group.

Banjar Group in order to improve our website, we monitor and analyse these statistics to determine:

- how many people visit our site; how many people return to our site;
- which pages people visit on our site;
- where people were before they came to our website;
- search terms you enter when using our search engine.

This information is collected on an aggregate basis. No personal information is associated with the statistics.

Your Email Address

We will record your email address in the event that you send a message by email, you provide us with your email address, or if you register requesting inclusion onto our database. If you do not want your email address to be recorded please contact us (contact details are provided at the end of this policy). Your email address will only be used for the purpose for which you have provided it and will not be disclosed for any other purpose without your prior written consent.

Security of Information

We protect your privacy by restricting access to your personal information to those who need it to process information or to provide you with information you have asked for.

The Internet is an insecure medium and users should be aware that there are risks when transmitting information across the Internet. Information submitted unencrypted via email or as a web forms may be at risk of being intercepted, read or modified. These activities are conducted at your own risk. Once we receive your transmission we make our best effort to ensure its security. If you do not wish to email or send information online, you can post the information to us (contact information provided at end of document).

Website linkages

Incorporated into our website are links to the websites of other organisations and businesses. External sites that are linked to or from our website are not under our control and you are advised to review their privacy statement.

The links we have incorporated do not and should not be taken as implying an endorsement or approval of the content of those websites or the activities of the organisations and businesses are responsible for those websites.

Data Quality and Access to update information

We will always try to maintain, complete and up to date information. If you wish to modify or update personal information that you have provided, please email us on recruit@banjargroup.com.au. We will update your details and email you a response confirming this has been completed.



Banjar Group will contact you on an annual basis to check that information is correct and if you do not wish to have your information retained please advise us by email.

9. WORK FORCE TRAINING

- a. In-house training of policy and any subsequent updates is conducted on an annual basis.
 - 1) New staff member training: At induction to the business
 - 2) Recurrent training: Annual review of policy training conducted on an annual basis

10. BUSINESS ASSOCIATE AGREEMENTS

- a. [Describe your organization's process for developing and executing Business Associate Agreements (BAA).]

11. EMPLOYEE COMPLAINTS

- a. Managed through our internal complaints process.

12. SANCTIONS

- a. Any misuse of information by an employee can lead to serious misconduct and termination of employment.

CONTACT DETAILS

If you have any queries regarding any aspects of this policy, please contact us as follows:

Banjar Group
PO Box 398
Essendon Victoria 3040
Australia
Telephone: +61 3 9337 3933
Website: www.banjargroup.com.au
Email: info@banjargroup.com.au