

## PRIVACY POLICY

Primary Ethics Ltd (PEL) recognises the importance of protecting the privacy and the rights of individuals in relation to their personal information and complies with the *Privacy Act 1988 (Cth)* requirements in respect of the collection, management, and disclosure of personal information.

- PEL will collect personal information for the purposes of recruitment, training, processing feedback or complaints, and payments.
- PEL will collect personal information directly from individuals during conversations, or when entered by the individual into our websites, or from third parties such as National Crime Check or Office of Children's Guardian.
- Refusal to provide personal information could lead to rejection of an application for a role with PEL, and/or the inability of Primary Ethics to investigate a complaint.
- Personal information is used
  - to keep contact details up to date so that we can communicate with the individual
  - to ensure compliance requirements are met
  - to process and respond to complaints and queries
  - for marketing
  - to comply with any law, regulation etc in co-operation with any governmental authority.
- Personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy. Staff and volunteers will not share personal information concerning other staff or volunteers without explicit consent. This includes personal phone numbers, personal email addresses, and the outcome of Police Check or WWCC change of status.
- Information on child protection matters can only be shared with authorised recipients: the school principal; the Primary Ethics Mandatory Reporting Officer, and the Child Protection helpline or website.
- Primary Ethics will store all personal information securely in a password protected website or in a locked filing cabinet. However, as the PEL website is linked to the internet, and the internet is inherently insecure, no assurance can be provided regarding the security of transmission of information communicated online. Primary Ethics also cannot guarantee that the information supplied will not be intercepted while being transmitted over the internet.
- Individuals may request access to any personal information held about themselves at any time by contacting Primary Ethics. There may be instances where PEL cannot grant access to the personal information they hold (for example, if granting access would interfere with the privacy of others).
- If an individual possesses information of a privacy breach at PEL, they must report it to the Primary Ethics Administration Manager.

### Legislation guiding this policy

*Privacy Act 1988 (Cth)*

### This policy relates to PEL:

- Members of the Board
- CEO
- Staff and contract trainers
- Volunteers
- Personal donors