

## EMPLOYEE DNA PTY LTD PRIVACY NOTICE

We at Employee DNA Pty Ltd t/as Employee DNA recognise the importance of protecting your personal information. Employee DNA complies with *Australia's Privacy Act 1988* (Cth) ("Privacy Act"), the National Privacy Principles required by that Act.

This is a summary of Employee DNA's policy on the management, collection, security, integrity, disclosure of and access to the personal information of customers. We recommend that you take the time to read this policy and retain a copy for future reference.

### Personal Information which may be collected and disclosed by Employee DNA

Information	Purpose of collection and disclosure of personal information and how we protect that personal information
<ul style="list-style-type: none"> <li>• <b>Contact details</b></li> <li>• <b>Driver's licence number</b></li> <li>• <b>Date of birth</b></li> <li>• <b>Occupation</b></li> <li>• <b>Financial and credit information</b></li> <li>• <b>Credit repayment history information (RHI)</b></li> <li>• <b>Payment default information</b></li> <li>• <b>serious credit infringement information, court proceeding information</b></li> <li>• <b>publicly available information, electoral roll information</b></li> <li>• <b>business affairs</b></li> <li>• <b>email preference</b></li> </ul>	<p>Personal information is collected for: Identification; to provide the services (including services that you may directly request or services to other people); to do all things necessary to administer those services; research, develop, manage, protect and improve those services; communicate with you regarding service arrangements; investigate, prevent and deal with fraud, unlawful activity and breaches of our agreement with you; conduct customer satisfaction surveys and inform you of any improvements that we have made to our services; conduct assessment of credit applications; provide notification to other credit reporting bodies (CRB) of a default that may be listed on a credit file if there is a payment that is more than 60 days overdue and of an overdue payment that is equal to or more than \$150.00; to exchange of information with other credit providers as to the status of a credit account; and to assess your credit worthiness with a credit reporting body pertaining to your credit history.</p> <p>This information is collected either directly from you, as authorised by you, when you respond to surveys and/or promotions, when you interact with us generally (including via our website), via publicly available information, as is required for our reasonable business purposes, and/or in accordance with the law.</p> <p>We may disclose your personal information to third parties including: Employees of Employee DNA; organisations and contractors that may be used to provide you with requested services; your company or organisation if you use our services under a corporate account; banks; credit reporting and fraud checking agencies; debt collection agencies, if you default in payment of monies owed to us; government, regulatory and law enforcement agencies where the disclosure is required or authorised by law. We may disclose your personal information to third parties to provide our services where that personal information is already publicly available.</p> <p>We collect your personal information directly from you or from public sources. Where it is unreasonable or impractical to collect the information directly from you we may collect that information from other persons that we deal with.</p> <p>When your personal information is provided to us by other people including family, friends, colleagues or clients, and where it is reasonable to assume you would not already know or expect us to have the information, we will take reasonable steps to inform you that we have received your personal information.</p> <p>You may choose not to provide some of your personal details</p>

	however this may limit us providing our services to you.
<b>Unsolicited or sensitive information</b>	<p>We may sometimes collect sensitive information. Sensitive information is only collected if the information is reasonably necessary for the purpose of performing our functions and activities. When we collect sensitive information we will collect it directly from you or with your consent unless we are otherwise entitled to do so.</p> <p>We will destroy unsolicited information, whether sensitive or otherwise, unless it is necessary for the reasonable purposes of our business.</p>
<b>Anonymity or pseudonymity</b>	We will preserve your anonymity or pseudonymity where practical and in accordance with the law.
<b>Overseas Disclosure of information</b>	<p>We generally do not disclose personal information overseas.</p> <p>However, if for any reason Employee DNA needs to disclose your personal information, we will comply with the requirements of the Privacy Act that relates to trans-border data flow.</p>
<b>Direct Marketing</b>	We will not use and/or disclose personal information for any direct marketing purpose.
<b>Government related identifiers</b>	Unless you otherwise authorise us, we will not collect and/or disclose government related identifiers with the exception of your driver's licence information which is collected in order to accurately identify you.

#### **Credit Information and Payment default**

If you default in the payment of any fees or charges to Employee DNA, we may give information about you to a credit reporting body to list your default in the credit reporting body's records. That information may then be shared by the credit reporting body with other credit providers for credit assessment and other purposes.

We may collect and hold any types of credit information that are permitted under the Privacy Act including: limited identity particulars (including employer and last three addresses); the fact that you owe us money and the amount and circumstances; permitted payment default information; information about serious credit infringements (e.g. fraud); information about adverse court judgments and insolvency.

You have the right to request credit reporting bodies not to:

- (a) use your credit information to determine your eligibility to receive direct marketing from credit providers; and
- (b) use or disclose your credit information, if you have been or are likely to be a victim of fraud.

#### **Website access and use**

Where you have used Employee DNA website for account access, to use our services, for expert product advice or to provide a testimonials, cookies may be used by Employee DNA to collect information including IP addresses and user identification. There are many aspects of Employee DNA website which can be viewed without providing personal information, though if you login for account access, it may require person information to be provided. Cookies allow Employee DNA to determine who has seen particular pages on its website and how frequently. This can help Employee DNA to identify your preferences and allow Employee DNA to recommend content it believes you would be most interested in.

For each visitor to reach the site, Employee DNA expressly collects the following non-personally identifiable information, including but not limited to: browser type; version and language; operating system; pages viewed while browsing the website; page access times; and referring website address; user account code or access code; information sought via account access. This collected information

is used solely internally for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are at the website.

From time to time, Employee DNA may use customer information from new, unanticipated uses not previously disclosed in this privacy notice. If Employee DNA information practices change at some time in the future, Employee DNA will use data collected from the time of the policy change for these new purposes only.

### **Security and Access of your Private Information**

Employee DNA endeavors to make sure the information we collect is accurate, complete and up to date. We shall take reasonable steps to protect personal information from misuse and loss and from unauthorised access, modification or disclosure.

### Destruction of Information

Employee DNA will destroy personal information upon your request (by telephone and/or by e-mail) or when the personal information is no longer required if that personal information is not already in the public domain. A further exception to this is if the personal information is required in order to fulfil the purpose of this organisation or is required to be maintained and/or stored in accordance with the law.

### External access to information

Any authorised representative including accountants, solicitors and financial planners must have been authorised to receive your personal information, security checked and verified and it be recorded on our database except if it's required in accordance with the law such as a Federal Act.

The following measures are in place in order to deal with any enquiries that would result in the divulgence of personal information:

Telephone Enquiry	Administration staff will establish identification by correct answer to personal questions: eg. DOB, address, employer, commencement with employer.
Written Enquiry	Response is provided to the address on the written enquiry but only if it is the same as in Employee DNA records.
Authorised Representatives	Any authorised representative including accountants, solicitors and spouses must have been authorised by you, security checked and verified and it be recorded on Employee DNA database except if it's required in accordance with the law such as a Federal Act.
Website Enquiries	User identification and password requirements for clients that are set and maintained by Employee DNA. You can correct your personal information by accessing our website.

### **Contact for Further Information or Complaints**

If you have any questions about how we handle your personal information or if you believe that we have handled your personal information inappropriately, you can contact Employee DNA via telephone on 02 8705 5431 or e-mail on [info@employeedna.com](mailto:info@employeedna.com). Employee DNA will respond to the complaint within 7 days of receipt and will take all reasonable steps to make a decision as to the complaint within 20 days of the receipt of the complaint.

If you are not satisfied with the way in which we handle your enquiry, you can call the Office of the Australian Information Commissioner on 1300 363 992 or make a complaint to the Information Commissioner on the OAIC website at [www.oaic.gov.au](http://www.oaic.gov.au).

### **Consent**

You hereby agree and consent to the contents of the collection, use and disclosure of your personal information. In the event that you do not wish to agree or consent to any of the above use, collection and disclosure of your personal information by Employee DNA, Employee DNA warrants that any request by you to withdraw your consent or agreement shall be deemed as confirmation by you to cease any and/or all collection use and disclosure of your personal information. Request (by telephone and/or by e-mail) can be made by you to Employee DNA.

**Changes to this Policy**

This is our current privacy policy outlining our personal information management practices. It replaces our previously published privacy policy. From time to time we may need to vary this policy. If we do so, an updated version will be posted on our website and shall apply to all the information held by us at the time.