



Privacy Policy

The Information Management Group Pty Ltd ('TIMG') adhere to the applicable Australian Privacy Act, Australian Privacy Principles [APPs] and Notifiable Data Breaches [NDB] scheme under Part IIIC of the Privacy Act 1988 [Privacy Act].

The Privacy Act 1988 [Privacy Act] regulates how personal information is handled. The Privacy Act defines personal information as:

...information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

Common examples are an individual's name, signature, address, telephone number, date of birth, medical records, bank account details and commentary or opinion about a person.

1. About this policy

This policy outlines how The Information Management Group Pty Ltd ABN 52 079 782 666 ('TIMG') collects, uses and discloses your personal information.

TIMG appreciates the importance of protecting your personal information. Our Privacy Policy complies with the Australian Privacy Principles set out in the Privacy Amendment [Enhancing Privacy Protection] Act 2012, and explains how your personal information will be managed when dealing with TIMG.

We understand that your privacy is important to you, and we value your trust. That's why we protect your information and aim to be clear and open about what we do with it.

By engaging TIMG to provide you with any goods or services, communicating with TIMG through email, by telephone, in writing or by using any of TIMG's [and its subsidiaries] services, including any of the TIMG websites, face-to-face conversation or meeting, products and services, you agree to the use and disclosure of your personal information in the manner described in this policy.

2. The purpose of collecting your personal information

TIMG collects personal information, such as:

- ▶ your name, address and contact details
- ▶ your credit or debit account details
- ▶ user IDs and passwords
- ▶ any goods or services provided to you
- ▶ records of your communications with TIMG
- ▶ website usage information
- ▶ information for reference – only with consent.

The primary purpose of collecting your personal information is for TIMG's business operation, which includes providing you with TIMG's goods and services, communicating with you, and improving and developing our business relationship with you. TIMG also collects personal information for marketing purposes.



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Personal information is only collected:

- if necessary for TIMG's operations
- by lawful and fair means
- where practicable, only from the individual concerned.

TIMG takes reasonable steps to ensure that you are aware of:

- the likely use of the information
- your right of access to the information
- the identity and contact details of the organisations that we disclose personal information to (eg ATO, lawyers if and when required, work photos and/or information about staff members to LinkedIn and Yammer)
- any law requiring collection of the information; and
- the main consequences of failure to provide the information.

3. How we may use and disclose your personal information

TIMG discloses personal information:

- for the primary purpose for which it was collected or
- where the individual would reasonably expect this or
- where the individual has consented or
- for direct marketing by TIMG, but giving individuals the opportunity to opt out of such direct marketing; TIMG includes its contact details in any direct marketing.

TIMG does not disclose your personal information for any secondary purposes unless your consent has been given or as required by law.

TIMG will not sell or license any personal information that it collects from you.

4. During your employment

TIMG as a business, is required to ensure that all employees are suitable for the nominated role and comply with all legal local and federal employment regulation (such right to work in Australia). We are required by law to provide your Tax File Number to government agencies (such as ATO). If you are an employee of TIMG (or its subsidiaries) or a contractor (with full-time, part-time or casual status) TIMG may access or disclose the following:

- disclose personal information to the government and/or government agencies as required by law
- keep record of your time and whereabouts (for payroll and security purposes and as part of TIMG internal operational requirements) – this can be achieved by utilising available technology
- use of CCTV and surveillance equipment as part of the security requirements of our business
- information for reference – only with consent
- personal and psychological assessments to establish job suitability and training requirements
- background and security checks – this may require a cross border personal information exchange with authorised agencies
- keep all your employment records on file for legal purposes after you have ceased your engagement with TIMG (or its subsidiaries). Any such information on file is treated as confidential with limited access. This includes (but is not limited to) records such as biometric personal records, medical records and other Personally Identifiable Information (PII) which is received, communicated and/or provided to TIMG in a solicited manner and with your knowledge.



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5. Accurate and up-to-date information

TIMG takes steps to ensure information is accurate [correct] and up-to-date by updating its records whenever changes to the data come to its attention. TIMG disregards information which seems likely to be inaccurate or out-of-date by reason of the time which has elapsed since it was collected, or by reason of any other information in its possession.

6. Security of your personal information

TIMG protects personal information from misuse or loss by restricting access to the information in electronic format, and by appropriate physical and communications security. Any data that is being destroyed is, is disposed of in a manner that protects the privacy of information in an appropriate manner.

7. Dealing with unsolicited information

TIMG takes all reasonable steps to ensure that all unsolicited information is destroyed immediately. Any unsolicited PII or information received will be addressed and affected entities will be notified.

8. Access to your personal information

TIMG acknowledges that individuals have a general right of access to information concerning them, and to have inaccurate information corrected.

9. Anonymity when dealing with TIMG

TIMG allows individuals the option not to identify themselves when dealing with it, where practicable.

10. Cross-border disclosure

Your personal information may also be processed by, or disclosed to employees or other third parties operating outside of Australia, who work for TIMG in countries including New Zealand, or by the representatives and employees of TIMG's parent company.

TIMG will take reasonable steps, in the circumstances before your personal information is disclosed to an overseas recipient, to ensure that the overseas recipient does not breach privacy laws in relation to your personal information ['the Required Steps'].

The Required Steps do not apply if you consent to the disclosure of your personal information to an overseas recipient. By supplying your personal information to TIMG, you consent to the disclosure of your personal information to an overseas recipient and agree that the Required Steps do not apply.

If you consent to the disclosure of your personal information to an overseas recipient, the overseas recipient will not be accountable under the Privacy Act, and you will not be able to seek redress for breaches under the Privacy Act.

11. Collecting sensitive information

TIMG does not collect sensitive information, unless it is specifically relevant and necessary for the purpose of TIMG's business operation. All sensitive information that is collected is used in accordance with this Privacy Policy. TIMG does not use government identifiers [e.g. tax file numbers] to identify individuals.



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12. Who should you contact for further information?

Please refer any queries or complaints about privacy issues to our:

Privacy Officer

The Information Management Group Pty Ltd

PO Box 21

Enfield NSW 2136

Phone: 1300 764 954

Email: info@timg.com

13. Notifiable Data Breaches (NDB) scheme

TIMG has established internal procedures which ensure an effective management of NDB scheme requirements. All personal information security breaches are reported following TIMG's internal Incident Management & Reporting procedure. Further assessment and evaluation processes have been put in place to ensure that any Personally Identifiable Information security breach is assessed against NDB requirements and actioned in compliance with OAIC [Office of the Australian Information Commissioner] reporting requirements.

Where the content of information being held by TIMG is not known or cannot be verified, TIMG notify the [contractually bound] owner or custodian of the information if there is a suspected breach of information security.

14. How this policy changes

This policy may change from time to time. A current version of this policy will be published on TIMG's website or may be obtained free of charge upon request.

A handwritten signature in black ink, appearing to read 'Chris Cotterrell'.

Chris Cotterrell

General Manager
23rd of February, 2018

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