

# Privacy Policy

■ The Information Management Group Pty Ltd ('TIMG') adhere to the following:

- Australian Privacy Act
- Australian Privacy Principles [APPs]
- Notifiable Data Breaches [NDB] scheme under Part IIIC of the Privacy Act 1988 [Privacy Act]
- European Union General Data Protection Regulation [GDPR].

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 of personal information 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 personal information.

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

TIMG understand that privacy is important to everyone, and values the trust of its clients and staff.

Agreement for TIMG to the use and disclose personal information in the manner described in this policy is implied by any of the following:

- By engaging TIMG to provide goods or services
- By communicating with TIMG via email, telephone, in writing, face-to-face conversation or meeting
- By using any of TIMG's [and its subsidiaries'] services, including any of the TIMG websites.

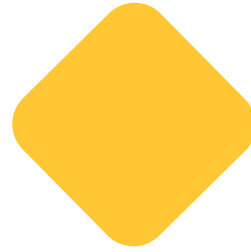
This Privacy Policy also explains how TIMG process 'personal data' about people in the European Union [EU], as required under the General Data Protection Regulation [GDPR].

Not all information requested, collected, and processed by TIMG is 'Personal Information', as it does not identify a specific natural person<sup>1</sup>. Such 'Non-Personal Information' is not covered by this privacy policy. However, as non-personal information may be used in aggregate or be linked with existing personal information; when in this form it will be treated as personal information. As such, this Privacy Policy will list both types of information for the sake of transparency.

In some situation users may provide TIMG with personal information without TIMG asking for it, or through means not intended for the collection of particular types of information. Whilst TIMG may take reasonable steps to protect this data, the user will have bypassed TIMG's systems, processes, and controls and thus the information provided will not be governed by this privacy policy.

In some situations, users may provide TIMG with personal information over platforms that are outside our control; for example, through social media or forums. Whilst any information collected by TIMG is governed by this Privacy Policy, the platform by which it was communicated will be governed by its own Privacy Policy.

<sup>1</sup> Natural person: An individual human being, as opposed to a legal person [organisation].



## 2. The purpose of collecting personal information:

TIMG collects personal information, such as:

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

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

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 clients and staff are aware of:

- the likely use of the information
- the right of access to their information
- the identity and contact details of the organisations that TIMG 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 personal information; and
- the main consequences of failure to provide personal information.

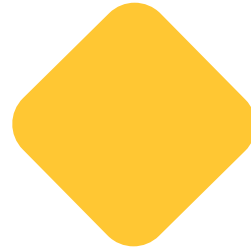
## 3. How TIMG may use and disclose personal information:

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 personal information for any secondary purposes unless consent has been given or as required by law.

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



#### 4. During employment:

TIMG is required to ensure that all employees are suitable for their nominated role and comply with all legal local and federal employment regulations (e.g. right to work in Australia). TIMG is required by law to provide Tax File Numbers of employees to government agencies (e.g. ATO). TIMG may access or disclose the following personal information of employees, whether full-time, part-time or casual (of TIMG or its subsidiaries) or contractors:

- to the government and/or government agencies as required by law
- keep records of employees' work time and locations (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 employment records on file for legal purposes after an employee has ceased their employment 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 the knowledge of the employee.

#### 5. Accurate and up-to-date information:

TIMG take 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 personal information:

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

#### 7. Dealing with unsolicited information:

TIMG take all reasonable steps to ensure that all unsolicited information is destroyed immediately. All recipients of unsolicited Personally Identifiable Information will inform the data subject(s) and the sender/provider, then delete/destroy the information.

#### 8. Access to personal information:

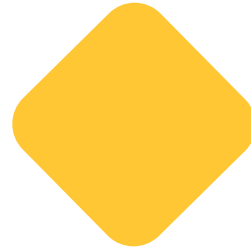
TIMG acknowledge that individuals have a general right of access to their personal information, and to have inaccurate information corrected.

#### 9. Anonymity when dealing with TIMG:

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

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<sup>2</sup> Data subject: A natural person whose personal data is processed.



## 10. Cross-border disclosure:

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 personal information is disclosed to an overseas recipient, to ensure that the overseas recipient does not breach privacy laws in relation to personal information ['the Required Steps'].

The Required Steps do not apply if an individual consents to the disclosure of their personal information to an overseas recipient. In this case, the Required Steps do not apply.

The European Union [EU] General Data Protection Regulation [GDPR] has harmonised the data privacy laws of each individual EU country, giving more rights to individuals located in the EU and more obligations to organisations holding their personal information. Personal information must be processed in a lawful, fair and transparent manner. As such, if an individual is located in the EU, the GDPR requires TIMG to provide the individual with more information about how TIMG collect, use, share and store personal information as well as advising of the individual's rights as a data subject<sup>2</sup>.

If consent is given to the disclosure of personal information to an overseas recipient, the overseas recipient will not be accountable under the Privacy Act, and an individual 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.

## 12. Erasure and Removal:

Data subjects have the right to ask TIMG to delete their personal information if there is no need for TIMG to keep it. The request must be made in writing by contacting the Privacy and Data Protection Officer. There may be legal or other reasons why TIMG need to keep personal information and if so TIMG will inform affected individuals.

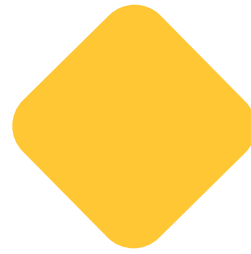
## 13. Automated decision making and profiling:

TIMG sometimes use systems to make automated decisions [including profiling] based on personal information collected from data subjects or obtained from other sources. This is done only with the consent of data subjects.

## 14. How to obtain further information?

To contact our Privacy Officer [Data Protection Officer] with an enquiry or a complaint about the way TIMG handles personal information, or to seek to exercise privacy rights in relation to the personal information that TIMG hold, contact our Privacy Officer [Data Protection Officer]:

Privacy and/or Data Protection Officer  
The Information Management Group Pty Ltd  
PO Box 21  
ENFIELD NSW 2136  
AUSTRALIA  
Phone: 1300 764 954  
Email: info@timg.com



## 15. 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.

## 16. 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 "Jason Carr".

**Jason Carr**

General Manager

Reviewed 31 May 2022

Issued 13 July, 2018