

## **Privacy Confidentiality and Disclosure**

Sureway Group and its related entities (referred to as "Sureway", "us", "we" or "our") is committed to protecting the privacy of your personal information, respecting your rights to privacy and complying with the Privacy Act 1988 (Cth) (the "Privacy Act").

This Privacy Policy details how we comply with our privacy obligations and how we collect, hold, use and protect your personal information. By submitting personal information to us, you agree to our use of your personal information as described herein, including any use of all websites owned or operated by or on behalf of Sureway.

This policy applies but is not limited to all full time, part time and casual employees, governing body members, any other people doing work on behalf of Sureway Group and its related entities (including licensees and contracted staff) as well as Sureway clients, employers, host organisations, suppliers, service providers and subcontractor entities (if any).

### **1. What is your personal information?**

When used in this policy, the term "personal information" has the meaning given to it in the Privacy Act. Personal information includes information or an opinion about an identified individual, or an individual who is reasonably identifiable from the information or opinion. In summary, personal information is any information about you that can be linked to you.

### **2. What personal information do we collect and hold?**

The personal information we collect and hold about you might include your name, address, telephone number, photo, video or audio recordings, email address, age or birthdate, gender / gender identity, information about your family arrangements, financial information such as salary, wage or payslip details, identity information such as driver's licence, passport or visa details, company or educational affiliations, profession or occupation and work history, qualifications, titles, contact information, information from your CV, employment records, referee details, information about your social security arrangements or NDIS funding arrangements, details of our services you have used or enquired about and other information about you. We also collect and hold government identifiers such as your Centrelink Reference Number, Jobseeker Identity Number, Tax File Number or Medicare Number.

Sensitive information is a specific category of personal information. Such information includes membership of a profession or trade association or of a trade union, health information, criminal record or cultural and language background. We will only collect, hold and disclose sensitive information about you in relation to your specific support requirements and in the context of the services we provide. We will get your specific consent to the collection and use of this information before collecting, holding, using or disclosing your sensitive information.

We also collect information that is not personal information because it is not linked to you or any other identifiable person. This includes aggregated information about how users use Sureway's websites and portals, anonymous answers to surveys and other information that is not linked to your identity.

### **3. How do we collect and hold your personal information? Do we display any information?**

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. Where this is the case, we may collect personal information in a variety of ways, including from people who refer you to our services, other parties that provide services and support to you, via any Sureway websites and portals (such as when you register your interest for services and programs of support or to apply for employment), when you respond to questionnaires or when you provide personal information to us by other means, such as in-person during conversations with us or our representatives, via your employer for the purposes of providing services to your employer, via your training or support provider, providing a business card, over the phone or by email.

Calls to Sureway's 1300 number are recorded for a variety of reasons including but not limited to research, quality, training or security purposes.

We also collect personal information from third parties including:

- our service providers
- business affiliates
- clients, and
- other third parties such as employers, advocates and persons nominated by you as referees, credit agencies or government agencies

#### 4. For what purposes do we collect, hold and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality service to you. We collect, hold and disclose your personal information for the following purposes (in some cases we may only disclose information with your consent):

- to provide employment services to you and or prospective employers, including to fulfil your requests for information and employment opportunities and to manage the job services for third parties and ourselves
- to provide health and non-vocational support services to you
- to coordinate the provision of services with other support providers which might include support workers, medical and health professionals, and training organisations
- to meet our contractual and reporting obligations with government departments, regulators and agencies
- to manage our client and business relationships
- to provide you important work-related information including workplace health and safety, work rosters and other information relating to your engagement by Sureway
- to undertake psychometric testing
- to perform statistical analysis of user behaviour in order to measure interest in specific areas and articles posted on any Sureway website or portal. The email addresses provided at registration allow us to send e-mails to individuals based on the areas of interest that they may indicate during the employment registration process
- to send communications requested by you, answer enquiries and provide information about existing or new services
- to provide your updated personal information to related bodies corporate, our customers, contractors or service providers, interpreters or advocates if such disclosure is required to administer our business functions or to provide our products and services to you
- to update our records and keep your records up to date
- to support monitoring, quality review and ongoing training, and to review and respond to any complaint made by you
- to manage administrative, legislative functions, contracts and funding agreements
- to manage any internal or external audit, privacy or Freedom of Information requests, or any internal or external investigations, and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in cooperation with any governmental authority of any country.

We will not intentionally disclose (and will take commercially reasonable steps to prevent the accidental disclosure of) your personal information to third parties, whether for such third parties' marketing purposes or otherwise, except when we believe we are under a legal duty to do so.

Authorisation from clients and customers must be obtained before disclosure to third parties occurs unless disclosure is required by law. Information may be disclosed where there is knowledge of criminal activity and/or an incident that indicates risk of harm.

If we are unable to collect your personal information, we may be unable to fulfil some or all of the purposes listed above. In particular, we may be unable to provide our services to you or provide you with full access to Sureway's websites and portals.

#### 5. To whom do we disclose your information

When we have a requirement to do so, we disclose your personal information to:

- Department of Employment and Workplace Relations
- Department of Social Services
- Department of Human Services (Services Australia)
- National Disability Insurance Agency
- Other Commonwealth agencies where required
- Contracted providers of the above government agencies where required under our contracts with the agency
- Contractors or service providers if such disclosure is required to administer our business functions or to provide our products and services to you
- Our employees, related bodies corporate, contractors or service providers for purposes of our services, the operation of our websites and portals and to fulfil your requests including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, auditors, debt collectors and professional advisors such as accountants, solicitors, business advisors and consultants
- Employers, host organisations, training providers or other activity providers
- Any organisation for any authorised purpose with your express consent
- Where otherwise required by law

## **6. How can I access, change, and/or delete information?**

You may request access to any personal information we hold about you by contacting our Risk Audit and Compliance Manager (Privacy Officer) as set out in Section 7. We will not charge for making the request or for making any corrections to your personal information. You will be required to provide sufficient information to allow us to confirm your identity.

There may be times when we cannot grant you access to the personal information we hold. For example, if access would interfere with the privacy of others or if it would result in a breach of confidentiality or law. We will let you know if this is the case.

If you believe that the personal information we hold about you is incorrect, incomplete or inaccurate, you may request us to amend it by contacting our Risk Audit and Compliance Manager (Privacy Officer). We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it. You may also have your personal information deleted. We will let you know if we cannot delete your personal information for legal or other reasons.

## **7. Security**

We take all reasonable steps to ensure that your personal information is protected from misuse, loss and from unauthorised access, modification or disclosure. We may hold your information in either or both electronic or hard copy form. Only authorised personnel will be provided with access to personal information. These parties are required to treat this information as confidential and deal with it in accordance with this Privacy Policy, the Privacy Act and social security law. The way we record and dispose of your personal information is in line with the standards for Government records management.

As Sureway's websites are linked to the internet and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any information which you transmit to us online is transmitted at your own risk.

## **8. Contact our Risk Audit and Compliance Manager**

If you have any questions in relation to your personal information, our Privacy Policy or any concerns or a complaint regarding the treatment of your personal information by us, e-mail us at - [qateam@sureway.com.au](mailto:qateam@sureway.com.au), write to us at Suite 3, 34-36 Fitzmaurice Street, Wagga Wagga, NSW 2650, or call 1300 787 392. We will treat your requests or complaint confidentially.

If you are dissatisfied with the way we manage a privacy complaint, you can raise your concerns with the Office of the Australian Information Commissioner. General information about privacy may be found via <http://www.privacy.gov.au> and <http://www.oaic.gov.au>.

We may change this Privacy Policy from time to time and all personal information held by us will be governed by the most recent version of our Privacy Policy. Any updated versions of this policy will be posted on the Sureway website.