

EPIC EMPLOYMENT SERVICE INC.

POLICY & PROCEDURE MANUAL

PART	-	CLIENTS	Page Ref	3/6.01
SECTION	-	PRIVACY/CONFIDENTIALITY	Revised	01/07/2009

PRIVACY COMPLIANCE POLICY

Introduction

It has always been the policy of EPIC to aim to protect consumers' privacy and confidentiality in all aspects of the consumers' involvement with the service, avoiding unnecessary and unauthorised disclosure of information while ensuring that the consumer has full access to all data gathered about him/her.

In December 2000, the *Privacy Amendment (Private Sector) Act 2000* was passed through Federal Parliament. Amendments to the *Privacy Act 1988* required private organisations to comply with the new provisions by 21 December 2001.

The Act sets down minimum standards for the protection of personal information, which are contained in ten National Privacy Principles (NPPs). The NPPs are rules about how organisations should handle personal information:

National Privacy Principles

1. Collection

EPIC-

- a. Must only collect personal information that is necessary for one or more of its functions or activities.
- b. Must collect personal information only by lawful and fair means and not in an unreasonably intrusive way.
- c. Must take reasonable steps to ensure that the individual from whom personal information is collected is aware:
 - i. Of the identity and contact details for the organisation
 - ii. That the individual can access the information
 - iii. Why the information is collected
 - iv. To whom the information is usually disclosed
 - v. Any laws requiring the collection
 - vi. Main consequences for the individual if the information is not provided.
- d. If reasonable and practicable, we collect from the individual directly.
- e. If personal information is collected from third parties, we must take reasonable steps to ensure the individual is aware of matters listed under (c) above.

EPIC EMPLOYMENT SERVICE INC.

POLICY & PROCEDURE MANUAL

PART	-	CLIENTS	Page Ref	3/6.02
SECTION	-	PRIVACY/CONFIDENTIALITY	Revised	01/07/2009

2. Use and Disclosure

- a. We must not use or disclose other than for the primary purpose of collection (namely a secondary purpose) unless:
 - i. The individual consents; or
 - ii. The secondary purpose is related to the primary purpose (directly related in the case of sensitive information) and reasonably expected by the individual; or
 - iii. Direct marketing and the information is not “sensitive”, impracticable to obtain consent and the individual can opt out; or
 - iv. Direct marketing and the information is “sensitive”, get consent from individual.
- b. In direct marketing, a customer must be given the option not to receive communications both at the time of first contact and at any time afterwards.

3. Data Quality

We must take reasonable steps to ensure personal information is accurate, complete and up-to-date.

4. Data Security

We must take reasonable steps that:

- i. Personal information is protected from misuse, loss, unauthorised access, modification or disclosure.
- ii. Personal information is destroyed or permanently de-identified if no longer needed.

5. Openness

- a. We must have available on request a clearly expressed policy statement outlining personal information handling practices. (See over on 3/6.04)
- b. On request, we take reasonable steps to let a person know what personal information we hold, for what purposes, how we collect, hold, use and disclose that information.

6. Access and Correction

- a. We must provide an individual with access to personal information about that individual.
- b. We must take reasonable steps to correct information.

7. Identifiers

We must not adopt as our own identifiers for an individual, an identifier assigned by Commonwealth agencies or contracted service provider, e.g.using TFNs.

EPIC EMPLOYMENT SERVICE INC.

POLICY & PROCEDURE MANUAL

PART	-	CLIENTS	Page Ref	3/6.03
SECTION	-	PRIVACY/CONFIDENTIALITY	Revised	01/07/2009

8. Anonymity

Where lawful and practicable, individuals have the right not to identify themselves.

9. Trans-border Data Flows

We may only transfer information on a person to someone in a foreign country if:

- i. We believe that the recipient is subject to a law/scheme/contract substantially similar to the National Privacy Principles; and
- ii. The individual has consented and the transfer is for her/his benefit; and
- iii. The transfer is necessary for the performance of a contract between the individual and our organisation.

10. Sensitive Information

We must not collect sensitive information unless:

- i. The individual has consented or such collection is required by law.

Note 1. Our Policy Statement on Personal Information Handling Practices is on 3/6.04

Note 2. The Privacy Amendment Act 2000 only applies to information relating to individuals, not other organisations.

EPIC EMPLOYMENT SERVICE INC.

POLICY & PROCEDURE MANUAL

PART	-	CLIENTS	Page Ref	3/6.04
SECTION	-	PRIVACY/CONFIDENTIALITY	Revised	01/07/2009

EPIC's POLICY ON PERSONAL INFORMATION HANDLING PRACTICES:

Adapted from a summary of NPP obligations contained in the amended “*Guidelines to the National Privacy Principles (September 2001)*” -

- If it is lawful and practicable to do so, we give people the option of interacting anonymously.
- We only collect personal information that is necessary for our function or activities.
- We only use fair and lawful ways to collect personal information.
- We collect personal information directly from individuals if it is reasonable and practicable to do so.
- We get consent to collect sensitive information unless specified exemptions apply.
- We take reasonable steps to make an individual aware of:
 - Why we are collecting information about them;
 - Who else we might give it to; and
 - Other specified matters.
- We take reasonable steps to ensure the individual is aware of this information even if we have collected it from someone else.
- We only use or disclose personal information for the primary purpose.
- We take reasonable steps to ensure the personal information we collect, use or disclose is accurate, complete and up-to-date. This may require us to correct the information.
- We take reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure.
- We take reasonable steps to destroy or permanently de-identify personal information if we no longer need it for any purpose for which we may use or disclose the information.
- We have this short document that sets out clearly expressed policies on the way we manage personal information and make it available to anyone who asks for it.
- If an individual asks, we take reasonable steps to let them know, generally, what sort of personal information we hold, what purposes we hold it for and how we collect, use and disclose that information. If an individual asks, we must give access to the personal information we hold about him/her.
- We only adopt, use or disclose a Commonwealth Government identifier if particular circumstances apply that would allow us to do so.
- We only transfer personal information overseas if we have checked that we meet the requirements of National Privacy Principle 9.