

### **Privacy Policy**

### Your privacy is important

This statement outlines LeadWise Research and Support Incorporated's policy on how LeadWise Research and Support Incorporated uses and manages personal information provided to or collected by it.

LeadWise Research and Support Incorporated is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

In relation to health records, LeadWise Research and Support Incorporated is also bound by the Victorian Health Privacy Principles which are contained in the Health Records Act 2001.

LeadWise Research and Support Incorporated may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to LeadWise Research and Support Incorporated's operations and practices and to make sure it remains appropriate to the changing legal environment.

This privacy policy assumes that you are resident in Australia. If you are resident in the UK or Europe, please contact us for more information regarding how we treat your personal information.

#### What kind of personal information does LeadWise Research and Support Incorporated collect and how does LeadWise Research and Support Incorporated collect it?

The type of information LeadWise Research and Support Incorporated collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- an individual's name, signature, address, phone number or date of birth
- employee record information
- photographs
- internet protocol (IP) addresses
- voice print and facial recognition biometrics (because they collect characteristics that make an individual's voice or face unique)
- location information from a mobile device (because it can reveal user activity patterns and habits).

#### Personal Information you provide:

LeadWise Research and Support Incorporated will generally collect personal information held about an individual by way of phone calls, forms, meetings etc. You do



have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

#### Personal Information provided by other people:

In some circumstances LeadWise Research and Support Incorporated may be provided with personal information about an individual from a third party, for example a referral for service.

#### In relation to employee records:

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to LeadWise Research and Support Incorporated's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between LeadWise Research and Support Incorporated and employee. However, LeadWise Research and Support Incorporated must provide access and ensure compliance with the Health Privacy Principles under the Victorian Health Records Act 2001.

# How will LeadWise Research and Support Incorporated use the personal information you provide?

LeadWise Research and Support Incorporated will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, LeadWise Research and Support Incorporated will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere, we will still send you direct marketing information where you have consented, and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

We may use video surveillance for security purposes and the footage will be used only by LeadWise Research and Support Incorporated and by the providers of our security services for security purposes. Surveillance videos are not used by LeadWise Research and Support Incorporated for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

#### Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, LeadWise Research and Support Incorporated's primary purpose of collection is to



assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which LeadWise Research and Support Incorporated uses personal information of job applicants, staff members and contractors include:

- for insurance purposes
- to satisfy LeadWise Research and Support Incorporated's legal obligations

Where LeadWise Research and Support Incorporated receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

#### Volunteers:

LeadWise Research and Support Incorporated also obtains personal information about volunteers who assist LeadWise Research and Support Incorporated in its functions or conduct associated activities, such as to enable LeadWise Research and Support Incorporated and the volunteers to work together.

#### Marketing and fundraising:

LeadWise Research and Support Incorporated treats marketing and seeking donations for the future growth and development of LeadWise Research and Support Incorporated as important. Personal information held by LeadWise Research and Support Incorporated may be disclosed to an organisation that assists in LeadWise Research and Support Incorporated's fundraising.

# Who might LeadWise Research and Support Incorporated disclose personal information to?

LeadWise Research and Support Incorporated may disclose personal information, including sensitive information, held about an individual to:

- government departments;
- people providing services LeadWise Research and Support Incorporated, and
- anyone you authorise LeadWise Research and Support Incorporated to disclose information to.

#### Sending information overseas:

LeadWise Research and Support Incorporated will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.



We do not use overseas providers of IT services including servers and cloud services.

# How does LeadWise Research and Support Incorporated treat sensitive information?

In referring to 'sensitive information', LeadWise Research and Support Incorporated means:

"Information relating to a person's racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual orientation or criminal record, that is also personal information; and health information about an individual".

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

#### Management and security of personal information

LeadWise Research and Support Incorporated's staff are required to respect the confidentiality of personal information and the privacy of individuals.

LeadWise Research and Support Incorporated has in place steps to protect the personal information LeadWise Research and Support Incorporated holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

We have a data breach response plan, which we would follow in the unlikely event of a privacy or data breach.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

#### Updating personal information

LeadWise Research and Support Incorporated endeavours to ensure that the personal information it holds is accurate, complete and up to date. A person may seek to update their personal information held by LeadWise Research and Support Incorporated by contacting the Privacy Officer of LeadWise Research and Support Incorporated at any time.

The Australian Privacy Principles and the Health Privacy Principles require LeadWise Research and Support Incorporated not to store personal information longer than



necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information LeadWise Research and Support Incorporated holds about you.

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which LeadWise Research and Support Incorporated holds about them and to advise LeadWise Research and Support Incorporated of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information LeadWise Research and Support Incorporated holds about you, please contact the Privacy Officer in writing.

LeadWise Research and Support Incorporated may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, LeadWise Research and Support Incorporated may charge a fee to retrieve and copy any material. If the information sought is extensive, the LeadWise Research and Support Incorporated will advise the likely cost in advance.

#### How long will LeadWise Research and Support Incorporated keep my information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

#### **Enquiries and privacy complaints**

If you would like further information about the way LeadWise Research and Support Incorporated manages the personal information it holds, please contact the Privacy Officer. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Privacy Officer who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns, we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting, then you can refer your complaint to the Office of the Australian Information Commissioner via:

- email: enquiries@oaic.gov.au
- tel: 1300 363 992
- fax: +61 2 9284 9666