



Public Privacy Policy

Protect Services Pty Ltd (ACN: 151 240 194),
Protect Severance Scheme No 2 Pty Ltd (ACN 606 361 853); and
ElecNet (Aust) Pty Ltd (ACN: 080 344 458) (The Group)
Commerical-in-Confidence

Right to Privacy

Protect Services Pty Ltd (ACN 151 240 194) as trustee for Protect Services Trust (ABN 38 975 124 058), Protect Severance Scheme No 2 Pty Ltd (ACN 6060 361 853) as trustee for Protect Severance Scheme No 2 (ABN 52 967 672 143) and ElecNet (Aust.) Pty Ltd (ACN 080 344 458), as trustee of the Protect Severance Scheme (ABN 98 395 548 596) – (together referred to in this policy as Protect) are required to comply with the Privacy Act 1988 (Cth) (Act), the Australian Privacy Principles and similar state legislation applicable to the privacy of individuals (Privacy Law).

Protect understands the importance of protecting an individual's right to privacy. This policy sets out how we aim to protect the privacy of your personal information, your rights in relation to your personal information managed by us and the way we collect, hold, use, disclose and otherwise manage your personal information (which may include sensitive information).

The Act defines personal information to mean information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Sensitive information includes, but is not limited to, details of an individual's religious beliefs, membership of a trade union and health information.

Protects' privacy policy

This policy represents our policy as at March 2018. We regularly review our practices and procedures regarding how we collect, hold, use, disclose and otherwise manage personal information. As a result, this policy may be updated from time to time. Where we update this policy we will make the updated policy available, including on our website. The amended policy will be effective upon being posted on the Protect website and access to the website following any update of the policy will be deemed consent to the revised policy.

Although we intend to observe this policy at all times, it is not legally binding on Protect in any way. From time to time we may regard it as necessary or desirable to act outside the policy. Protect may do so, subject only to any statutory rights you have under Privacy Law.

What kinds of personal information does Protect collect?

The kind of personal information collected by Protect includes, but is not limited to:

- name, street, telephone number(s);
- date of birth;
- email address;
- occupation;
- salary; and
- tax file number.

How does Protect collect personal information?

There are a number of circumstances in which Protect will collect personal information from you. Protect will not collect personal information unless the information is necessary for one or more of its functions or activities. Further, Protect will only collect personal information by lawful and fair means and not in an unreasonably intrusive manner.

Protect will collect information directly from the person about whom the information relates when it is reasonable and practicable to do so.

Protect may collect personal information about workers from a third party, such as from the worker's employers. Where Protect does so, reasonable steps will be taken to ensure that you are made aware of how to contact Protect to access your information, the purposes for which the information is collected, the types of organisations to which information is usually disclosed and any law that requires the particular information to be collected.

Why does Protect collect your personal information?

Protect's primary role is to operate a national severance scheme and administer a national injury and illness insurance scheme for industry workers. Protect collects personal information about workers in order to administer the schemes. We may not be able to administer your benefits in the Protect scheme if we do not collect this information.

Protect may also offer other worker services such as employment advice or referrals. As part of these services, detailed personal and sensitive information may be collected. If you seek additional services from Protect you may be asked to provide personal information for the purpose of providing the service.

Use and disclosure of personal information

Protect may use or disclose personal information for the primary purpose for which it was collected. If Protect uses or discloses personal information for a purpose other than the primary purpose for which it was collected (the Secondary Purpose), to the extent required by Privacy Law, Protect will ensure that:

- the Secondary Purpose is related to the primary purpose of collection (and directly related in the case of sensitive information), and which you would reasonably expect that Protect would use or disclose the personal information in that way;
- you have consented to the use or disclosure of the personal information for the Secondary Purpose;
- use or disclosure is required or authorised by law or a permitted health situation; or
- the use or disclosure is otherwise permitted by Privacy Law and any applicable state law.

To administer the severance and insurance schemes and to ensure that the purposes of the schemes can be fulfilled, Protect may disclose personal information it holds. Specifically, Protect may disclose personal information held by Protect about workers to Australian-based organisations including, but not limited to:

- principal contractors on building sites;
- employers that contribute to Protect;
- certain office bearers of divisional unions;
- a union, which is the holder of the insurance policy, including in order to confirm currency of insurance cover under the national injury and illness insurance scheme administered by Protect Services;
- nominated employer association representatives;
- insurers (and their claims handling agents);
- government bodies including, but not limited to, Centrelink and the Child Support Agency; and
- third party service providers including, but not limited to, debt recovery agencies (where Protect needs to recover unpaid contributions), printing companies, providers of information technology services, and document disposal agencies.

Protect may use contractors to provide some of the services offered by Protect. Information disclosed to Protect may be provided to such service providers. All contractors engaged by Protect are required to abide by Protect's privacy policy.

Protect may disclose personal and sensitive information if we believe that there is a serious and imminent threat to an individual's life, health or safety, or a serious threat to public health or public safety.

Protect may also use personal information we hold to provide workers with details of promotional offers and special events, although you will always be given the opportunity to opt-out of receiving such material.

Protect will not disclose your personal information to overseas recipients.

Quality and security of personal information

Protect will take reasonable steps to:

- ensure that the personal information it collects, uses or discloses is accurate, complete up to date and relevant;
- protect personal information it holds from misuse and loss and from unauthorised access, modification or disclosure; and
- destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used or disclosed under Privacy Laws.

We may hold your personal information in both hard copy and electronic forms.

Personal information is held on secure servers or in storage located in controlled, access restricted environments. Our employees are required to maintain the confidentiality of any personal information held by us and are bound to do so under a Confidentiality Agreement. Personal information may also, in certain circumstances, be held on behalf of Protect in hard copy or electronic forms by Protect's service providers (such as offsite document storage providers or electronic data storage providers). Protect enters into agreements with such service providers which impose confidentiality and privacy obligations on the service provider.

Can you access or correct the personal information that Protect holds about you?

Protect will take reasonable steps to ensure that personal information it collects, holds, uses and discloses about an individual is accurate, complete, up-to-date, relevant and not misleading.

Under Privacy Law, you have a right to request access to or correction of your personal information that is collected and held by us.

To obtain access to or correction of your personal information, we may request that you provide us with proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected.

Upon receiving a request for access to or correction of personal information we will review the request, make a decision regarding the request and notify you of that decision.

We will seek to respond to requests for access to or correction of personal information within 30 days of the date of the request.

There may be some situations where Protect may not allow you to access personal information it holds about you, or may refuse to correct personal information. In these situations, Protect will provide you, in writing, with reasons for this decision (which may include but are not limited to the belief that disclosure may pose a serious threat, be used for unlawful activity or impact upon your privacy) and details of complaint mechanisms available to you.

If at any time you would like to request access to or correction of the personal information we hold about you, or you would like more information on our approach to privacy, please contact our Privacy Compliance Officer (Business Manager) using the contact details following..

Additional information for users of the Protect website

If you visit www.protect.net.au to read, browse or download information, our system may record information such as the date and time of your visit to the website, the pages accessed and any information downloaded. This information is used for statistical, reporting and website administration and maintenance purposes only.

Like many websites, the website may use “cookies” from time to time. Cookies are small text files that we transfer to your computer’s hard drive through your web browser to enable our systems to recognise your browser. Cookies may also be used to record non-personal information such as the date, time or duration of your visit, or the pages accessed, for website administration, statistical and maintenance purposes.

Any such information will be aggregated and not linked to particular individuals. The default settings of browsers like Internet Explorer always allow cookies, but users can easily erase cookies from their hard-drive, block all cookies, or receive a warning before a cookie is stored. Please note that some parts of the website may not function fully for users that disallow cookies.

While we take great care to protect your personal information on the website, unfortunately no data transmission over the internet can be guaranteed to be fully secure. Accordingly, we cannot ensure or warrant the security of any information you send to us or receive from us online. This is particularly true for information you send to us via email or by submitting information using the website. We have no way of protecting that information until it reaches us. Protect will not be liable in any way in relation to any breach of security or unintended loss or disclosure of information due to the website being linked to the Internet.

The website may contain links to other sites. We are not responsible for the privacy practices, policies or content of those sites.

How to contact Protect

For further information or enquiries regarding your personal information or to request access to or correction of personal information or to make a privacy complaint, please contact Protect’s Privacy Compliance Officer (Business Manager) using any of the following contact details:

Attention: Privacy Compliance Officer (Business Manager)

Email: info@protect.net.au

Phone: 1300 344 249

Post: Ground Level
200 Arden Street
North Melbourne VIC 3051

Privacy complaints

If you believe that we have not dealt with your personal information in a manner that complies with Privacy Law, you can make a privacy complaint to us.

Please direct all privacy complaints to Protect’s Privacy Compliance Officer (Business Manager) in writing using the contact details set out above.

At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect your existing obligations or affect the commercial arrangements between you and us.

Upon receipt of your complaint, we will commence an investigation into your complaint.

You will be informed of our response to your complaint following the completion of the investigation. We will seek to respond to privacy complaints within 30 days of the date of the complaint. In the event you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.