



# Privacy Policy

AU

## Purpose

The purpose of this policy is to outline the Company's commitment to safeguarding the privacy of its Personnel. This policy sets out how the Company will collect, use and treat Personal Information.

## Scope

This policy extends to any and all persons, corporate or natural, whether employed, contracted or otherwise associated with the Scopesuite Pty Ltd and/or its subsidiaries. This Policy is not a standalone Policy and should be read in conjunction with the Related Policies and documents outlined within this policy.

## Legislation

*Privacy Act 1988 (Cth) and Australian Privacy Principles*

## Related Policies

The below related policies and documents should be read in consultation with this Privacy Policy:

- *Security Architecture Document AU*
- *Incident Management Policy AU*
- *Record Retention Policy*

## Definitions

**"NPPs"** means National Privacy Principles

**"Personnel"** means any and all persons, corporate or natural, whether employed, contracted or otherwise associated with the Scopesuite Pty Ltd and/or its subsidiaries.

**"Personal Information"** is defined in the Privacy Act 1988(Cth) as

- (i) information or an opinion about an identified individual, or an individual who is reasonably identifiable:
  - (a) whether the information or opinion is true or not; and
  - (b) whether the information or opinion is recorded in a material form or not

**"Sensitive Information"** is defined in the in the Privacy Act 1988(Cth) to mean information or an opinion about an individual's:

- racial or ethnic origin;
- political opinions;
- membership of a political association;

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- religious beliefs or affiliations;
- philosophical beliefs;
- membership of a professional or trade association;
- membership of a trade union;
- health
- sexual preferences or practices; or
- criminal record

**“Service” means** cloud-based business solutions, designed to manage training and development

**“The Company” means** Scopesuite Pty Ltd

## Policy

The Company respects employees and customers’ rights to privacy. The Company adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth).

The Company has adopted the National Privacy Principles (“**NPPs**”) contained in the Privacy Act 1988. The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Federal Privacy Commissioner at [www.privacy.gov.au](http://www.privacy.gov.au).

### 1 Collection of personal information

The Company will, from time to time, receive and store Personal Information you enter onto the Company’s website ([www.scopesuite.com.au](http://www.scopesuite.com.au)), provided to us directly or given to the Company in other forms.

The Company may ask employees and customers to provide the Company with certain Personally Identifiable information that can be used to contact or identify you. Personally, Identifiable information may include, but is not limited to, your full name, email address, phone number, postal address, workplace address, gender and other information ("Personal Information").

The Company will hold and have access to employee’s personal information, which may include Sensitive Information.

The Company may collect additional information at other times, including but not limited to, when employees and customers provide feedback, provide information about personal or business affairs, change content or email preference, respond to surveys, provide financial or credit card information, or communicate with support services. The Company may also collect any other information you provide while interacting with the Company.

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## 2 Collection of personal information

The Company will collect Personal Information from employees and customers in a variety of ways, including via electronically, in person, when accessing our website ([www.scopesuite.com.au](http://www.scopesuite.com.au)) and when the Company provides a service to you.

The Company collects Personal Information for the primary purpose of providing our services, providing information to our clients and marketing. We may also use Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

In some circumstances we may be provided with information by third parties. In such case, the Company will take reasonable steps to ensure that personnel are made aware of the information provided to the Company by the third party.

## 3 Use of personal information

The Company may use Personal Information collected to provide information, updates and the Company's services. The Company may also make employees and customers aware of new and additional products, services and opportunities available.

Personal Information is also used to provide employees and customers with the best service experience possible on the Service and for our internal business purposes that form part of normal business practices. Some provisions of Personal Information are optional.

The Company will use Personal and Sensitive Information of employees for the purpose of administering payroll and managing human resource administration processes and functions including, but not limited to, payment of salaries, performance management, superannuation, workers compensation and training and development.

## 4 Disclosure of Personal information

The Company may disclose your Personal Information to any of employees, officers, insurers, professional advisors, agent, suppliers or subcontractors insofar reasonably necessary for the purposes set out in this Policy. Personal Information is only supplied to a third party when it is required for the delivery of our services.

The Company from time to time may need to disclose Personal Information to comply with a legal requirement, such as law, regulation, court order, subpoena, warrant in the course of a legal proceeding or in response to a law enforcement agency request.

By providing the Company with Personal Information, employees and customers consent to the terms of this Privacy Policy and the types of disclosure covered by the Policy.

## 5 Security of Personal Information

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The Company is committed to ensuring that the information you provide to the Company is secure. In order to prevent unauthorised access or disclosure, the Company have put in place physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

## **6 Access to your Personal Information**

Employees and customers may request details of Personal Information that the Company hold about them in accordance with the provisions of the *Privacy Act 1988* (Cth).

In order to protect Personal Information, we may require identification from personnel before releasing the requested information.

## **7 Changes to Privacy Policy**

It is important to be made aware that this Privacy Policy will, from time to time, be amended or updated. Changes made to this policy is at the discretion of the Company.

## **8 Quality of Personal Information**

It is an important the Company that Personal Information is up to date. The Company will take reasonable steps to make sure that Personal Information is accurate, complete and up-to-date.

If Personnel find that the information is not up to date or is inaccurate, the Company encourages personnel to contact the Company so information can be updated to ensure a quality Service is

## **9 Retention of Personal Information**

The Company will take reasonable steps to destroy Personal Information where the Personal Information is no longer needed for the purpose of of which the information may be lawfully used (the “**Service**”).

Where Personal Information is to be retained in accordance with Australian Law, Personal Information will be destroyed only after completion of the retention period outlined by the Law. Employee information such as time and wage records will be retained for a period of seven (7) years (see Information Retention Policy and Procedure).

## **Responsibilities**

All employees and directors must understand and adopt use of this policy and are responsible for ensuring the safety and security of the Company’s systems and the information that they use or manipulate.

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The CEO of the Company is responsible for overseeing and implementing the Privacy Policy across the footprint of the Company.

The CEO has a responsibility to ensure employees of the Company comply with the Company's Incident Management Policy, procedures and guidelines.

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