

Privacy Policy

ISGM believes that privacy is an important individual right, and to that end we will endeavour to abide by the Australian Privacy Principles, as set out in the *Privacy Act 1988* (the **Act**).

This policy sets out how we collect, use, manage and store personal information in accordance with the Act. You agree to the collection, use and disclosure of personal information in accordance with this privacy policy.

1. Terminology

In this policy:

- **APP** means the Australian Privacy Principles prescribed by the Privacy Act 1988
- **client** is a reference to an entity to which we supply subcontracting services
- **Personal information** means any information or opinion about a natural person (whether or not true) which is reasonably identifiable)
- **sensitive information** means (without limitation) information about an individual's race, political opinions, religious beliefs, philosophical beliefs, membership of a trade union, sexual preference, criminal record, or health, genetic or biometric information, including "sensitive information" as defined in the *Privacy Act 1988*
- **subcontractor** is a reference to a person that is a subcontractor of ISG Management
- **"we" "us" and "our"** are references to ISG Management Pty Ltd (CAN 142 916 970)
- **Website** means our website at <http://www.isgm.com.au/>
- **"you" and "your"** means a natural person whose personal information we have knowingly collected

2. What personal information we collect

- Personal information is information that can reasonably be used to identify a specific person. Depending on the purpose for which we collect personal information, personal information we collect or hold may include your name, telephone or mobile phone number, email address, bank account numbers, previous job history, and any other personal information you or a person ostensibly authorised by you submits to us, as well any other information that we consider is necessary (such as information about your opinions) to perform our functions and activities.
- ISGM may also collect sensitive information, which includes an individual's health information. ISGM may also collect police checks from prospective and current employees or sub-contractors.

3. How we collect personal information

We collect personal information in a number of ways, including:

- Where you provide information directly to us on our Website or a hardcopy form;
- Where you provide information directly to us during a recruitment process;
- Where you complete feedback forms online or using a hardcopy form
- Where you interact directly with our employees and such other persons acting for us or on our behalf, such as our customer service team or People team;
- From third parties, such as our service providers;
- From related entities in our corporate group; and
- From publicly available sources of information.

Where we collect, use and disclose sensitive information about you, we will only do so where it is reasonably necessary to conduct our business and either:

- We have obtained your consent
- It is permitted by law

If you do not wish for your personal information to be collected in a way anticipated by our Privacy Policy, we will use reasonable endeavours to accommodate your request. If we do comply with your request, or you provide us with inaccurate or incorrect information, we may not have sufficient information to conduct our business and we may be limited:

- In our ability to provide our services to subcontractors and clients
- In our ability to keep you informed of company updates and services information
- In considering your application for employment with us; and
- In our ability to respond to your inquiry or request.

4. Purpose of collection, use and disclosure

We collect, use and disclose personal information for the primary purpose of conducting our business, which includes:

- Providing and managing the delivery of products or services;
- Supplying and managing contractor workforces;
- Establishing, maintaining and managing an account with an organisation;
- Assessing a person's application for employment with us, or with clients who contract ISGM to recruit and select people on their behalf;
- Delivering service and company update notices to you, to inform you about new goods or services or information about projects being undertaken
- To provide information to debt collection agencies, solicitors and legal representatives for the purpose of recovering debts and reporting to a credit reporting or debt collection agency of any credit defaults;
- Accessing any credit application made to us by you or an applicant in respect of which are a director, principal, partner or proposed to act as a guarantor;
- Resolving disputes
- Collecting feedback forms (online or hardcopy) to improve our services;
- Responding to an inquiry or request;
- Identifying repeated employment applications and avoiding duplication of records in respect of applicants;
- Maintaining the integrity of our employment application process
- Consolidating and verifying our records;
- Engaging with contractors or outsourced service providers who assist our business operations such as technology services;
- Improving our services;
- Compiling and maintaining mailing lists derived from our Website or our hardcopy forms and communicating with persons on those lists;
- Collecting and disclosing personal information to related bodies corporate in connection with the corporate group's own internal operations;
- Fulfilling obligations to, and cooperating with, government authorities;
- Doing something that one would reasonably expect us to do using the information; and
- Where you otherwise provide your consent, whether express or implied

- In circumstances where we are considering an application for employment, or pass on such an application to one of our clients, we may require you to provide a police check, which is classified as sensitive information. We will only use this information for the purpose of assessing your application and meeting our contractual obligations with our clients. We will only disclose sensitive information to our clients where you would reasonably expect us to do so and where the reason for doing so is directly related to our primary purpose of collecting that information, or it is required by law.
- In conducting our operations, we may share some of your personal information with third parties such as contractors and outsourced service providers, our clients and financial service providers. If we disclose your personal information to a third party, we will take all reasonable steps to ensure that that the third party does not breach the APPs in relation to that information. Unless you have agreed, these parties are not allowed to use your personal information for any other purpose except to assist in conducting our business.
- As at the date, the privacy policy was most recently updated, your personal information will not be disclosed overseas. In the future, we will not disclose your personal information overseas unless we have your consent.

5. Storage and security of personal information

- Where we hold your personal information, we will take reasonable steps to ensure that the information is secure and may only be accessed by authorised persons. All personal information transmitted via our virtual private network and our customer management system is encrypted.
- Where we store your personal information electronically, there are restrictions as to who has access to that information, for example there is password protection and locked folders. There are also different levels of security access for different individuals, depending on their position in ISG Management Pty Ltd. All hardcopies of personal information are stored in a lockable storage room or lockable offices.
- Although we take all reasonable measures, we are not responsible for third party circumvention of security measures on our electronic databases or at any of our premises. Please note that third party recipients of personal information may have their own privacy policies and we are not responsible for their actions, including their handling of personal information.
- We cannot control the actions of other persons with whom you share your information. Please notify us immediately at privacy@isgm.com.au if you believe there has been any unauthorised access to your information.
- If any personal information that we hold is no longer required for the purpose in which it was collected and no applicable law requires us to retain that information, we will take reasonable steps to de-identify or destroy the information. Specifically, we hold credit application for seven years from the start of ISGM's credit dealings with the relevant credit recipient. We hold employment applications for 7 years.

6. Direct Marketing

When you provide your personal details to us, you consent to us using your personal information for direct marketing purposes (for an indefinite period). This includes contacting you as part of the iEXTRA program offered by ISGM.

- From time to time, we may contact you with information about products and services offered by us and other companies which we think may be of interest to you. This includes offering

discounts and special deals to you. When we contact you it may be by mail, telephone, email or SMS.

- Where we use or disclose your personal information for the purpose of direct marketing, we will:
 - Allow you to ‘opt out’ or in other words, allow you to request not to receive direct marketing communications; and
 - Comply with a request by you to “opt out” of receiving further communications within a reasonable time frame.
- We will only ever contact you if you have consented to direct marketing, and you can ask to be removed from our marketing lists at any time by directly contacting us.
- If you don’t wish to receive new information, just email us at privacy@isgm.com or contact our Privacy Officer using the details at clause 8 of this Privacy Policy.

7. Access and correction

- We will use reasonable steps to ensure the personal information we hold is complete, up to date and accurate, so far as it is practicable for us to do so.
- You may request access to the personal information we hold about you by contacting our Privacy Officer. If we determine, having regard to the APPs, that it is either not lawful or not required by law to provide you access to the personal information we hold, we will provide you with a written response within a reasonable period of time, setting out our reasons. If we are otherwise obliged or permitted to give you access to that personal information, we will do so within a reasonable time. We reserve the right to charge you a fee for providing access.
- If personal information we hold about you is incorrect, we will, on your request to correct it or where we are satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading, take such steps as are reasonable in the circumstances to ensure that the information is corrected.
- If you wish to have your personal information deleted please let us know and we will delete that information wherever practicable. If we become aware that your personal information is no longer needed for any of our purposes, we will take reasonable steps to de-identify or destroy it.
- If you request us to correct personal information that we hold about you and we refuse to do so, we will, to the extent reasonable, provide you a written response as to our reasons.

8. Questions and complaints

If you have a question about how we handle personal information, wish to lodge a complaint about our compliance with the APPs, you may contact our Privacy Officer:

David Kay
National Risk and Compliance Manager
L20/390 St Kilda Road Melbourne VIC 3004
1300 474 000
privacy@isgm.com.au

- The Privacy Officer will co-ordinate the investigation of any complaint and any potential resolution of a complaint. We will aim to resolve all complaints as soon as practicable for us to do so.
- If you are not satisfied with our response, you may take your complaint to the Office of the Australian Information Commissioner, whose website is: www.oaic.gov.au.

9. Changes to this Policy

We may change this Privacy Policy at any time. If we make changes to this Privacy Policy, we will notify you by publication here. The revised version of the Privacy Policy will be effective at the time we post it.



Liz Butcher

Chief Executive Officer

Issue Date: May 2014

The policy will undergo scheduled reviews to ensure that it remains relevant and appropriate, and to re-confirm the ISGM commitment to People Management.