

PRIVACY STATEMENT



Our commitment and expectations

ADCO respects the privacy of information provided to us and information collected about visitors to our website. This Privacy Statement explains how we may collect, use and disclose information that we obtain about you, and your rights in relation to that information.

Scope of Privacy Statement

The objective of this Policy Notice is to treat personal information we receive from you, our clients or other third parties in accordance with the Privacy Act 1988 (Cth) (the Privacy Act).

Personal information is any information (including an opinion) that can be used to identify an individual.

Sensitive information is a subset of personal information that includes information about an individual's race or ethnicity, political or religious beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences, criminal record and health information.

Purpose of collecting, holding, using and disclosing personal information

We collect, hold, use and disclose personal information from employees, clients, suppliers, contractors, job applicants, and potential clients, as well as other individuals where it is reasonably necessary:

- for our services, functions or activities and management of our business affairs; and
- to fulfil our legal and/or regulatory obligations.

Collection of personal information

General

We will collect personal information directly from you, our clients and authorised representatives.

We may also collect personal information from third parties such as regulatory authorities, your employer, other organisations with whom you have dealings, government agencies, credit reporting agencies, recruitment agencies, information or service providers, publicly available records and third parties.

We may collect current and historical personal information, including your name, contact details, nationality, identification, gender, organisation, business interests, employment, positions held, special categories of data (such as race and ethnicity, trade union membership, health information, political opinions or religious beliefs), billing and financial information, as well as enquiry/complaint details.

We may also collect personal information about your other dealings with us, including any contact we have with you in person, by telephone, email or online.

Online Services

When you use our online services, we may collect the following:

- information you provide by completing subscription, registration and application forms (including when you submit material or request further services);
- information you provide to us if you contact us, for example, to report a problem with our online services or raise a query or comment; and
- details of visits made to our online services, such as the volume of traffic received, logs (including the internet protocol (IP) address and location of the device connecting to the online services and other identifiers about the device and the nature of the visit) and the resources accessed.

Careers and recruitment

If you apply for a job or work placement (including through our online application system) you may need to provide information about your education, employment and state of health.

Your application will constitute your express consent to our use of this information to assess your application and to allow us to carry out both recruitment analytics and any monitoring activities that may be required of us under any applicable law as an employer. We may also carry out screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks) and consider you for other positions.

We may disclose your personal information (including diversity and equal opportunities data) to recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, recruitment analytics and diversity research providers, referees and your current and previous employers. We may also collect your personal information from these parties in some circumstances.

CCTV

Where our offices and other premises are protected by CCTV or facial recognition technology, you may be recorded when you visit. We use CCTV and facial recognition to help provide a safe and secure environment for our visitors.

We consider the processing of data collected for these purposes to be in our legitimate interests so that we can have a safe workplace. Access to our CCTV Systems and any recorded images containing personal information is strictly controlled. Any use and disclosure of any recorded images will be determined in accordance with the relevant provisions of the Privacy Act.

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Use and disclosure of your personal information

Personal information will be stored on ADCO's systems for business and administration purposes as detailed above and may be used or disclosed for the purpose for which it was collected or for a related purpose that may be reasonably expected. Sensitive information will only be disclosed if it is reasonably expected to be disclosed for a purpose directly related to the purpose for which it was collected.

We may also use or disclose your personal information (including to overseas recipients):

- to third party service providers and business associates involved in the provision of services in connection with our business, including cloud service providers, such as data storage platforms;
- to regulatory authorities, courts, tribunals, government agencies, law enforcement agencies and other third parties;
- with your consent or where the organisation that you work for has obtained your consent (where necessary); or
- as required or authorised by law.

Please be aware that your personal information may be accessed by third parties from countries whose laws provide various levels of protection for personal data, which are not always equivalent to the level of protection that may be provided in Australia. Where we transfer your information internationally, we will take all reasonable steps to ensure that your information is handled in a manner consistent with the Privacy Act.

Security of personal information

Personal information will be retained for only as long as needed to meet the primary purpose for which it was collected, or as otherwise required by law.

We take reasonable steps to hold information securely in electronic or physical form and to prevent unauthorised access, modification or disclosure. Our information security protocols are supported by a number of security standards, processes and procedures and we store information in access controlled premises or in electronic databases requiring logins and passwords. We require our third party data storage providers to comply with appropriate information security industry standards. All staff and third party providers with access to personal information are subject to strict confidentiality obligations.

Cookies

We use cookies on our online services to improve efficiency and provide website usage information (including IP address, operating system and browser type) to help us improve your experience when you browse our website. Cookies are not used to identify an individual or to send targeted advertising.

Third party sites

Our website may contain links to other sites, which are controlled by third parties.

Visitors should consult these other sites' privacy policies and please be aware that we do not accept responsibility for their use of information about you.

Your rights

You have a right to apply to access or amend your personal information.

If you would like to request a copy of your data or would like to take steps to exercise any of your rights under the Privacy Act, please contact us in writing as set out below.

We take all reasonable steps to ensure the information we hold about you is up-to-date, complete and accurate. Accordingly, please advise us in writing of any changes to your information using the contact details set out below.

Contact details and questions

If you have any questions about this Privacy Statement, have concerns about the way in which your personal information has been handled, or wish to submit a written complaint, please contact ADCO's Chief Information Officer on (02) 8437 5000.

If you believe we have breached our obligations under the Privacy Act, you may make a privacy complaint to us in writing via the contact details noted above. We will review your complaint as soon as possible, and generally within 30 days of receiving it. We may ask you for further details, consult with other parties and keep records regarding your complaint.

Status of this Privacy Statement

We review this Privacy Statement regularly and reserve the right to revise it, or any part of it, from time to time to reflect changes in the law or technology practices.