

## Privacy Policy

### Kelly Group of Companies Pty Ltd

#### SCOPE

This Privacy Policy applies to personal information collected, used and disclosed by Kelly Group of Companies Pty Ltd. We, us, our, Kelly Group means Kelly Group of Companies Pty Ltd.

We respect our obligation to protect the privacy of the personal information of individuals with whom we deal, in accordance with the *Australian Privacy Principles ('APPs')* of the *Privacy Act 1988 (Cth) (Privacy Act)*.

By using any of our products or services, visiting our website or giving us their personal information, individuals agree to their personal information being collected, stored, used and disclosed as set out in this Privacy Policy.

#### COLLECTION

##### ***What personal information do we collect and hold?***

We only collect personal information (information/opinion about an individual who can reasonably be identified from that information/opinion) that is reasonably necessary for our functions or activities, or is required or permitted by law.

We collect personal information including:

- names, addresses, e-mail addresses, phone numbers, other contact details, payment details, occupation and other information to assist us in conducting our business, providing and marketing our products and services;
- photos and/or video surveillance in public areas of our buildings for safety and security purposes;
- information about staff and directors, as required in the normal course of human resource management and the operation of a business; and
- information about our current and previous suppliers and clients with whom we have dealings.

We will only collect sensitive information (e.g. information about an individual's race, ethnic origins, political opinions or association, trade or professional associations and memberships, union membership, criminal record or health information):

- if the individual has consented to us doing so and it is reasonably necessary for one or more of our functions or activities – for example, as part of information collected about directors and employees for company, and human resource management purposes; or
- where required or permitted by law.

### ***How and from whom do we collect personal information?***

We only collect personal information by lawful and fair means.

Wherever reasonable and practicable, we collect personal information from the individual to whom the information relates or their authorised representative. This is typically as a result of, and in connection with, our on-going business relationship with those individuals. For example, we may collect personal information when individuals:

- request or acquire a product or service from us;
- provide a service or product to us;
- apply for employment with us;
- communicate with us via our website, by e-mail, telephone or in writing;
- attend face-to-face meetings, interviews and telephone calls with us;
- provide a business card; or
- fill out forms, including as part of acquiring a product or service from us.

We sometimes collect personal information from a third party or from a publicly available source, but only if it is unreasonable or impracticable to collect that personal information from the individual.

If we receive personal information that we have not requested, and we determine that we could not have lawfully collected that information under the APPs had we asked for it, we will destroy or de-identify the information if it is lawful and reasonable to do so.

### ***Why do we collect the personal information?***

We collect the personal information:

- necessary for us to provide individuals with the products and services they have requested from us;
- for marketing purposes and to provide individuals with information about products and services that may be of interest to them;
- to improve the products and services we provide; and
- to enable us to conduct our business, including meeting our legal and regulatory obligations.

Generally we will tell individuals why we are collecting the information, prior to or when we collect it.

If individuals do not provide their personal information, we may not be able to supply the requested product or service, employ or otherwise deal with the individual.

## USE AND DISCLOSURE

### *We use personal information:*

- in the ordinary course of conducting our business. For example, supplying or acquiring products and services; responding to individuals' enquiries and feedback; providing information about our events, news, publications and products and services that may be of interest to individuals; and maintaining a relationship with individuals;
- for market research and product and service development, so that we are able to better understand our customers' needs and tailor our future products and services accordingly;
- in performing general administration, reporting and management functions. For example, invoicing and account management, payment processing, risk management, training, quality assurance and managing suppliers;
- for employment-related purposes, such as recruiting and providing services to staff;
- as part of a sale (or proposed sale) of all or part of our business;
- for other purposes related to or in connection with our business, including meeting our legal and contractual obligations to third parties and for internal corporate governance purposes; and
- as required or permitted by law.

We may disclose personal information to:

- people and organisations engaged by us to provide products or services, or to undertake functions or activities, on our behalf. For example, processing payment information, managing databases, marketing, research and advertising;
- our contractors, business partners, joint venturers, partners or agents; and
- our external advisers, e.g. where disclosure is reasonably required to obtain advice, prepare legal proceedings or investigate suspected unlawful activity or serious misconduct.

We may use and disclose individuals' personal information (other than sensitive information) to provide individuals with information about our products and services that we consider may be of interest to the individual. An individual may contact us (see 'How to Contact Us') if they wish to opt out of receiving further marketing offers, via email or otherwise. Direct marketing offers will contain an opportunity to opt out from receiving further communications of this nature.

Kelly Group will only use or disclose an individual's sensitive information for the purpose for which it was initially collected (the 'primary purpose') or for another purpose only with your consent or if required or permitted by law.

Kelly Group may disclose personal information to overseas recipients where our business uses 'cloud' computing or backs-up our IT systems online. Any overseas disclosure does not affect our commitment to safeguarding individuals' personal information. Where reasonable in the circumstances, our contracts with overseas recipients oblige them to comply with the APPs and the Act.

However, individuals acknowledge that, in agreeing to the disclosure of their information to overseas recipients, we will no longer be required to take reasonable steps to ensure overseas recipients' compliance with the APPs in relation to the individual's information and we will not be liable to the individual for any breach of the APPs by those overseas recipients. On this basis, individuals consent to such disclosure when supplying their personal information to us.

## QUALITY OF INFORMATION

We will take reasonable steps to ensure that the information that we collect, use and disclose is accurate, complete and up-to-date. However, we rely on individuals to advise us of any changes or corrections to the information we hold about the individual. An individual is able to contact us (see 'How to Contact Us') and ask for the correction of personal information we hold if the individual believes the information we hold is inaccurate or incomplete.

## SECURITY OF PERSONAL INFORMATION

We take reasonable steps to keep personal information protected from loss and misuse and unauthorised access, modification and disclosure. We use a variety of physical and electronic security measures including:

- restricted and controlled physical access to our secured premises.
- password restricted and monitored access to computers and electronic databases.
- virus protection software.
- appropriate encryption and secure databases.
- electronic firewall and router.
- electronic computer and database back-ups stored securely.

When personal information that we collect is no longer required, we will **take reasonable steps to destroy or permanently de-identify** the personal information.

## ACCESS OF PERSONAL INFORMATION

An individual may contact us (see 'How to Contact Us') to access the personal information that we hold about the individual. We will respond to such a request within a reasonable period after the request is made. There are occasions where this access may be denied under the exemptions contained in the Privacy Act. If we deny access in some circumstances, we will advise the individual about the reasons.

No fee applies for requesting access to information we hold about individuals. However, we reserve the right to charge a reasonable fee where we do provide access.

## CORRECTION OF PERSONAL INFORMATION

An individual may contact us (see 'How to Contact Us') to correct the personal information that we hold. We will deal with your request within a reasonable period after the request is made. We will

take all reasonable steps to correct that information and ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

### **PSEUDONYMS AND ANONYMITY**

Where lawful and practicable, we will give individuals the option of interacting with us anonymously or using a pseudonym.

### **AVAILABILITY OF PRIVACY POLICY AND AMENDMENTS**

This policy is available upon request. It will be reviewed from time to time and any amendments will be included in the updated policy.

We reserve the right to revise this Privacy Policy or any part of it from time to time. Please review this Policy periodically for changes. Any revised policy will be placed on our website at [www.kellygroup.net.au](http://www.kellygroup.net.au)

An individual's continued use of our website, products or services, requesting our assistance, or the provision of further personal information to us after this Privacy Policy has been revised, constitutes the individual's acceptance of the revised Privacy Policy.

### **MAKING A COMPLAINT**

An individual may contact us (see 'How to Contact Us') to complain about a breach of this Privacy Policy or the APPs. We will handle any complaints promptly in a professional manner by referring the matter internally to the Kelly Group Privacy Officer. Kelly Group will endeavour to remedy any breaches of this Privacy Policy or the APPs and put procedures in place to ensure any such breaches are not repeated. If the complainant is not satisfied with the way we have handled a complaint, a further complaint to the Office of the Australian Privacy Commissioner is able to be made.

### **HOW TO CONTACT US**

For further information contact the Kelly Group Privacy Officer at our office via telephone, email, fax or written correspondence.