

I. INTRODUCTION

The Privacy Act 1988 provides extensive regulations about the collection, storage and use of information relating to individuals. It also contains some specific exemptions for organisations that have a need to collect, store and use information about individuals, one of which is to exempt the “acts and practices of employers in relation to employee records”.

To be exempt, an act or practice relating to the employee record must be directly related to the employment relationship. This means that acts or practices of an employer that are outside the scope of the employment relationship are not exempt. For example, the Legatus Group ('LG') could not sell details of employees to another organisation.

The act or practice must also be directly related to a current or former employment relationship. This does not cover future employment relationships. This means that personal information collected from prospective employees who are subsequently not employed, such as unsuccessful job applicants, are not covered by the employee records exemption.

Once an employment relationship is formed with an individual, LG holds relating to that individual's pre-employment checks then become exempt.

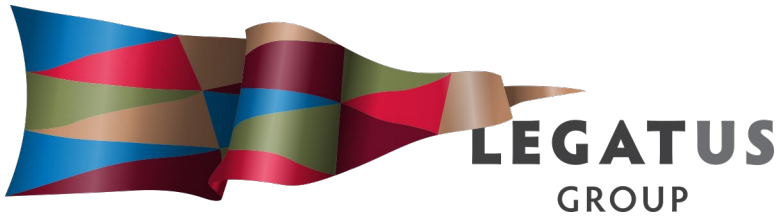
LG is also covered by the 13 Australian Privacy Principles, as set out in the legislation, which cover all aspects of dealing with personal and sensitive information, not only those relating to employees.

LG recognises the importance of protecting personal information, which it may be required to collect from individuals who become associated with its business. The purpose of this Privacy Policy is to ensure that any individual who provides information to LG is protected according to the requirements of the Privacy Act 1988.

2. DEFINITIONS

For the purpose of this Privacy Policy, information is described as:

- personal information means information relating to an individual, including an opinion, which may be provided to LG as part of normal business practise either in material form or not, and whether true or not. Such information



may personally identify an individual or make the person's identity reasonably apparent;

- sensitive information means information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual practices, criminal record or health information.

LG takes its obligations under the Privacy Act 1988 seriously, and as such, takes all reasonable steps in order to comply with the Act and protect the privacy of personal information that it holds.

3. POLICY DETAILS

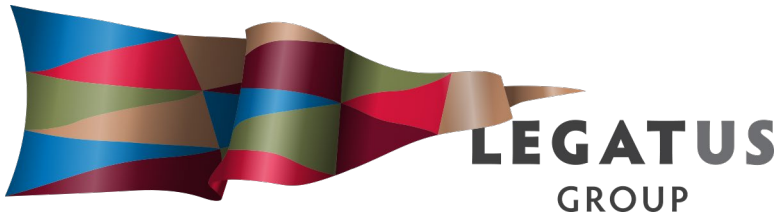
Collection and Use of Information

LG may require the collection of personal information from individuals to enable it to provide undertake its day to day business activities. The reasons for the collection of personal information include, but are not limited to, taxation, superannuation, payroll, direct communication with staff or external clients, and other legal requirements.

LG may collect and hold personal information, such as, but not limited to, names of employees and proprietors of organisations, addresses, telephone numbers, facsimile numbers, email addresses, titles and professional affiliations. These details are collected for the purpose of providing LG services to customers and clients, and the selling and marketing of its products and extended range of services. LG may also use such information to apply customer or member satisfaction surveys and events, such as loyalty programs. LG does not disclose this information to any other organisation, nor does it send any information overseas for any purpose whatsoever.

In the event that sensitive information is collected by the LG, it is not used for any purpose without the express permission of the individual.

Storage, Access and Retention of Personal Information



Personal information collected by LG is retained as part of a database, which is securely monitored and maintained by LG. The data is not made available to a third party, unless it is legally required and verified, without the authority of the individual who provided the personal information.

LG makes available for inspection personal information, based on the information supplied by the individual, that it holds in relation to an individual, provided reasonable notice is given. In the event that any part of the personal information that the individual inspects is determined to be incorrect and requires alteration, then LG makes such alteration in compliance with the corrected advice provided by the individual.

LG takes all reasonable steps to protect the security of the personal information that it holds. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

Where information held by LG is no longer required to be held, and the retention is not required by law, LG will destroy such personal information by secure means.

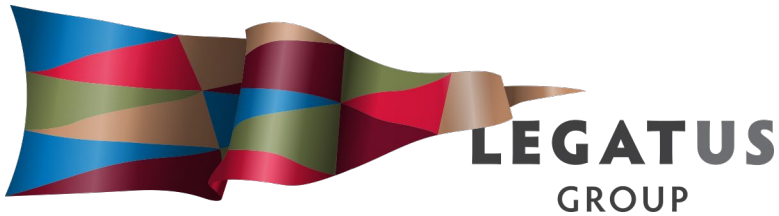
Compliance

If an individual has any concerns regarding the privacy of personal information, the individual may make a complaint to the Human Resources Advisor who will endeavour to resolve the complaint.

Sources of Information

Where possible, LG collects the information directly from individuals, customers and clients. In some instances, LG may collect personal information from press reports or published mediums and, in this case, it endeavours to verify such details with the person concerned.

LG acknowledges that there is no obligation for an individual to provide personal information. However, if an individual chooses not to provide LG with personal details, it may not be able to provide the individual with a full range of services or may reduce the ability of directly servicing the individual's organisation.



Purpose of the Collection

LG may require the collection of personal information to satisfy the needs of the organisation. The reasons for the collection of the personal information include, but are not limited to, taxation, superannuation and other legal requirements.

The personal information may be required for the purpose of:

- giving the information which a member or customer is entitled to;
- supplying to, and administering, the products and services the member or customer requires.

LG may also collect the information for the provision of marketing, unless a specific request in writing is provided, detailing what is not required.

LG may need to give personal information to other organisations to comply with its legal obligations, such as auditors, legal advisers and the Australian Taxation Office (or any other relevant organisations).

Disclosure to an Organisation

LG may disclose personal information, for the purposes set out above, to any of its subsidiaries, branches, franchises or legally related companies, agents, dealers or contractors. Disclosure to external parties or entities does not occur without the individual's consent except where disclosure is required by law. LG is unlikely to be required to disclose personal information to overseas recipients.

LG acknowledges that there is no obligation for an individual to provide it with personal information. However, if an individual chooses not to provide LG with personal details, it may not be able to provide the individual with a full range of services or may reduce the ability of directly servicing the individual's organisation.

Access Rights and Contact Details

The Privacy Act 1988 provides the right to access personal information held by LG. If the information is inaccurate, a request can be made to correct it.

In order to comply with the privacy laws, organisations are required to provide specific information to an individual at the time the personal information is collected. An organisation must take reasonable steps to ensure that the individual is aware of this information, whether or not an individual requests it. The individual must also be told who is collecting the information, the reason for collecting it and how to directly contact the privacy officer.

LG reserves the right to charge a nominal fee if required for the retrieval of information requested.

Further information can be obtained by contacting LG nominated privacy officer. A copy of the Australian Privacy Principles can be accessed at <http://www.oaic.gov.au/privacy/privacy-resources/privacy-fact-sheets/other/privacy-fact-sheet-17-australian-privacy-principles>.

Signature:



Chief Executive Officer

Date: 12 June 2020

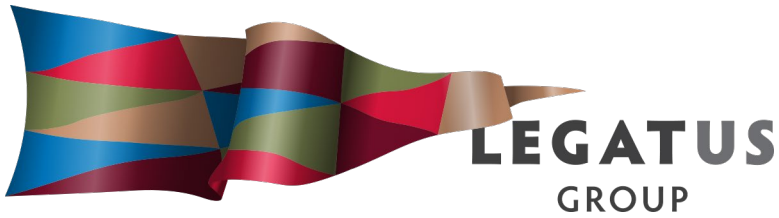
If a conflict exists with any law in Australia, then the provisions of the law in Australia will prevail to the extent of the conflict.

4. LEGISLATION & OTHER DOCUMENTS

Freedom of Information Act 1991 (as amended)

Local Government Act 1999 (as amended)

State Records Act 1997 (as amended)



5. AVAILABILITY & GRIEVANCES

This policy is available for inspection at the Legatus Group office at 318 Main North Road, Clare during ordinary business hours.

It is also available for inspection, download or printing, free of charge, from the Legatus Group's website at www.legatusgroup.sa.gov.au

Any grievances in relation to this policy or its application should be forwarded in writing addressed to the Chief Executive Officer, Legatus Group, PO Box 419, Clare, SA 5453.

6. REVIEW

This Legatus Group Policy shall be reviewed by the Legatus Group within (4) years of the issued date.

Date	Revision Number	Reason for Amendment
5 June 2020	I	No amendment