

## PURPOSE

This Policy explains how HB Group (Qld) Pty Ltd protects and manages the privacy of staff, clients and candidates.

## SCOPE

This Privacy Act Statement applies to HB Group (Qld) Pty Ltd and its subsidiaries (HB Labour Management Pty Ltd, and Mulholland-Kerin Trust); all managers, officers, employees and contractors of HB Group. This Policy also applies to Candidates undertaking recruitment processes

## POLICY STATEMENT

HB Group is committed to protecting the privacy of all individuals. To deliver our commitment to privacy, we are bound by the Privacy Act 1988 (Cth) as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) and the 13 Australian Privacy Principles (APPs) contained within that Act. All employees and officers of HB Group are required to comply with the Act and this Privacy Statement.

Information or opinions which are collected, held, used or disclosed by HB Group about an individual whose identity is apparent, or can reasonably be ascertained, will be protected by the standards outlined in this Statement.

To deliver our commitment to privacy, we will:

- Be bound by, and comply with, the APPs under the Act in relation to personal information
- Communicate this Privacy Statement to all employees and stakeholders to ensure awareness of their requirement to comply with our privacy standards and to anyone else who asks for it
- Ensure that lawful, fair and unobtrusive means are used to collect personal information that is necessary for our business purposes
- Collect sensitive information only with the individual's consent and not disclose any personal information to an unrelated third party, except with the individual's consent or where we are permitted to do so by law
- Take reasonable steps to destroy or de-identify personal information in a secure manner when we have no further need for it or are required to do so by law
- Take reasonable steps to ensure that only authorised personnel who have agreed to keep personal information confidential have access to the information
- Take reasonable steps to keep personal information up to date, accurate and complete
- Provide individuals access to their personal information on request, and
- Periodically review and revise this Privacy Policy and related procedures to maintain relevance.

HB Group recognises and respects the importance of each individual's privacy. This Statement and related procedures ensure all personal information held by HB Group is handled appropriately and kept confidential.

## INFORMATION COLLECTED AND RELEASED

HB Group will only collect personal information to the extent that it is reasonably necessary for the purposes of our business.

HB Group may collect the following types of personal information:

- Information about potential employees including application forms, CVs, interview notes, references, names and contact details of referees, and pre-employment medical information
- Current employee information including name, addresses, email, telephone numbers, TFN, bank account details, next of kin details, date of birth, gender, salary, superannuation funds, licenses, memberships, qualifications, passport details and medical information
- Contact information about current and potential clients, consultants, subcontractors, suppliers

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and industry participants

- Third party information obtained through contact made via our website.

HB Group collects personal information orally, in writing, by telephone, via email and via its website.

HB Group collects information in a number of ways including:

- Job applications or email queries via website enquiry
- As it establishes payroll records for employees
- Through the ongoing management of employees during their time with HB Group
- By collecting client, supplier and business partner contact information as part of the ongoing management of its business relationships.

Personal information must be collected in a lawful and fair manner and the collection must be reasonably necessary for the functions and activities of HB Group. Sensitive personal information must only be collected with consent.

## WHAT DO WE USE PERSONAL INFORMATION FOR?

Any personal details provided to HB Group will be used for the purpose for which it was provided. This may involve disclosing your personal information to subsidiaries within HB Group, or to external service providers who assist us in operating our business. These organisations are required to comply with the principles of this Statement.

## DISCLOSING PERSONAL INFORMATION

HB Group's policy is not to disclose any personal information to any unrelated third party, except with your consent, or where we are permitted by law to do so.

There are certain safeguards, which must be met before it is allowed to transfer personal information outside HB Group and these are set out in the Privacy Act. When disclosing information, HB Group will take all reasonable steps to ensure that the recipient will handle the information in a manner consistent with the Privacy Act.

Unless HB Group are required to provide personal information to others by law, by court order or to investigate suspected fraud or other unlawful activity, personal information gathered will only be seen or used by persons working in or for HB Group and on a strictly 'need to know' basis. That is, unless the information is directly related to the reasonable completion of their duties, such information will not be disseminated.

Our information systems and files are kept secured from unauthorised access and our staff and contracted agents/ service providers have been informed of the importance we place on protecting privacy and their role in helping us to do this, and are contractually bound to honour such privacy.

## RETENTION AND DISPOSAL OF INFORMATION

HB Group will only keep personal information it needs for the purpose for which it was collected. HB Group will take reasonable steps to dispose of such information when it has no further need to use it, or it is required by law to do so.

HB Group maintains a Records Management Procedure documenting the periods for which personal information records are kept. Destruction of paper based records occurs as soon as practicable in every matter, through the use of secure shredding and destruction services.

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## COLLECTION OF INFORMATION VIA WEBSITE?

The HB Group website provides a forum for contacting HB Group for the purpose of requesting information about job vacancies, services, or making other enquiries.

By submitting a web generated feedback form, certain personal information is provided, which may include name, e-mail address, and any other details included in the online form. We collect this information for the purpose of dealing with requests. HB Group do not collect any other personal information via the site. See our statement on cookies below.

## E-MAIL SECURITY

Any e-mails you send or receive will be automatically checked for viruses and copied for our email archives. Our IT administrators may have access to e-mails to manage e-mail security.

## SECURITY OF INFORMATION

HB Group are aware that the Internet is not a secure environment. However, HB Group use all reasonable efforts to ensure that any personal information collected, in whatever format, is held securely.

HB Group's usual approach to holding personal information includes robust storage and security measures at all times. Information on collection is:

- As soon as practical converted to electronic means;
- Stored in secure, password protected systems, such as recruitment database; financial system; and
- Monitored for appropriate authorised use at all times.

In addition, only authorised personnel have access to personal information and are required to comply with this policy. Authorised personnel are provided with login information to each system, with system access limited to only those relevant to their specific role. HB Group systems are hosted internally with robust internal security to physical server locations and server systems access. Virus protection, backup procedures and ongoing access monitoring procedures are in place.

## USE OF COOKIES

A cookie is a small file containing a string of characters to your computer that uniquely identifies your browser. It is information that your web browser sends back to our website server whenever you visit it again. We use cookies to 'remember' your browser between page visits. In this situation, the cookie identifies your browser, not you personally. No personal information is stored within our cookies.

## ACCESSING AND UPDATING PERSONAL INFORMATION

Upon request, HB Group will provide individuals with access to information held about them, unless there is an exception, which applies under the APPs. If you are refused access to the information, we will provide you with reasons for the refusal and inform you of any exceptions relied upon under the APPs.

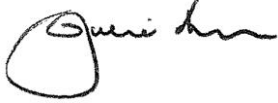
HB Group takes reasonable steps to ensure personal information is accurate, complete and up to date whenever we collect or use it. If personal information we hold about individuals is inaccurate, incomplete or out of date, we will make every effort to correct this information.

Individuals can access their personal information and notify us of any change, modification or correction, by contacting HB Group during office hours.

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### COMPLAINTS AND FURTHER INFORMATION

Complaints or requests for further information about how HB Group handles personal information or privacy issues are to be directed to HB Group during office hours.

A handwritten signature in black ink, appearing to read 'Julie Kerin'.

**Julie Kerin**  
**Managing Director**

**28/02/2018**

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