

# PO.PC.003 | Privacy Policy v1.3

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## 1 THE POLICY

The *Privacy Act 1998* (Cth) (“**Privacy Act**”) establishes a national scheme for the collection, holding, usage, correction, disclosure and transfer of personal information by companies such as ours. Individuals, to a certain extent, have the right to know what information we hold about them and a right to correct that information if it is wrong.

RXP Limited (“RXP”, “our”, “us” or “we”) are committed to treating the personal information we collect in accordance with the Australian Privacy Principles (“**APPs**”) in the Privacy Act. This Privacy Policy sets out how RXP handles personal information.

This Privacy Policy does not apply to personal information collected by us that is exempted under the Privacy Act (i.e. employee records).

## 2 PURPOSE & PRIVACY STATEMENT

The purpose of this policy is to ensure we comply with the Privacy Act and handle personal information appropriately. This Privacy Statement sets out our policy relating to the collection and use of your personal information. At RXP we have a few fundamental principles around privacy:

- We don’t ask you for personal information unless we truly need it.
- We don’t share your personal information with anyone except to comply with the law, develop our products and services or protect our rights.
- We don’t store personal information on our servers unless required for the on-going operation of one of our services.
- In our mobile products, we aim to make it as simple as possible for you to control what’s visible to the public, seen by search engines, kept private, and permanently deleted.

We will have clearly expressed policies on our management of personal information, and these will continue to be readily available. On request from an individual, we will take all reasonable steps to let the individual know, generally, what sort of personal information we hold, for what purposes, and how we collect, use, and disclose that information. RXP otherwise complies with the APPs under the Privacy Act.

It is RXP’s policy to respect your privacy regarding any information we may collect while operating our websites. The website may contain links to other websites. Please note, we are not responsible for the privacy practices of those other websites.

## 3 WHAT INFO DO WE COLLECT?

Generally, the types of personal information we collect include (but is not limited to):

- names, job titles, contact details (i.e. address, phone number and email);
- information in identification documents (for example, driver’s license and other forms of ID);
- tax file numbers and other government-issued identification numbers;

- date of birth and personal information about your spouse and dependents;
- bank account details, shareholdings and details of investments;
- superannuation details and insurance arrangements;
- educational qualifications, employment history, salary/wage and referee reports;
- visa or work permit status; and
- your Internet Protocol (“IP”) address.

It may be necessary in some circumstances for RXP to collect sensitive information about you in order to provide specific services or for recruiting purposes. Examples of the types of sensitive information we may collect in such circumstances can include:

- professional memberships;
- ethnic origin;
- criminal record; and/or
- health information.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with RXP as usually we need to use your personal information to provide specific services to you, or which relate to or involve you.

## **4 HOW WE COLLECT AND MANAGE PERSONAL INFORMATION**

### **4.1 Collecting Personal Information**

We tend to collect your personal information from you directly (i.e. when we deal with you in person or over the phone, when you send us correspondence (including emails), when you complete a questionnaire, form or survey, when you subscribe to our publications or when you use our website or our social media).

Sometimes it may be necessary for us to collect your personal information from a third party (i.e. we may collect your personal information from your employer where they are an RXP client or from a publicly available record). We may also collect personal information about you from your use of our websites and information you provide to us through contact mailboxes or through any the registration process on our websites.

Further to this, certain visitors to RXP’s websites choose to interact with us in ways that requires us to gather personal information. The amount and type of information RXP gathers depends on the nature of the interaction (i.e. we ask individuals who apply for a position on our careers page to provide their email address and phone number for us to respond to them). In each case, RXP collects such information only insofar as is necessary or appropriate to fulfil the purpose of the visitor’s interaction with RXP. RXP does not disclose personal other than as described in this policy and visitors can always refuse to supply personal information, with the caveat it may prevent them from engaging in certain website-related activities.

#### **4.2 Personal Information About Other People**

If you provide us with someone else's personal information, you should only do so if you have their **authority** and/or **consent** to do so. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy.

#### **4.3 Storing Personal Information**

We hold personal information in hard copy and electronic formats. We take security measures to protect the personal information we hold including physical (i.e. security passes to enter our offices and storage of files in lockable cabinets) and technology (i.e. restriction of access, firewalls, the use of encryption, passwords and digital certificates) security measures. We also have document retention policies and processes.

#### **4.4 Reason for collecting, holding, using and disclosing personal information**

We collect, hold and use personal information for a several reasons. Some of these are:

- to provide professional, technology and solutions services;
- to respond to requests or queries and maintain contact with our clients/other contacts;
- to keep our clients and contacts informed of our services and industry developments;
- to verify your identity;
- for recruitment, administrative purposes any other business-related purposes;
- to conduct surveys;
- to meet any regulatory obligations; and
- to perform internal statistical analysis, including of our databases and website.

If you do not provide us with the personal information we have requested, we may not be able to complete or fulfil the purpose for which such information was collected, including providing you or our clients with the services we were engaged to perform.

The types of third parties to whom we may disclose your personal information include:

- experts or other third parties contracted as part of an engagement;
- our service providers and professional advisers;
- as part of an engagement, if you are a client, an employee, a contractor or supplier of services to one of our clients, then we may disclose your personal information as part of providing services to that client;
- government or regulatory bodies or agencies, as part of an engagement or otherwise.

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non personal, de-identified or aggregated information to them for research or promotional purposes.

#### **4.5 Disclosure of personal information overseas**

Depending on the nature of the engagement or circumstances of collection, we may disclose your personal information in accordance with the Privacy Act. The countries to which such disclosures are made, and types of personal information disclosed, depend on the specific circumstances of the engagement.

We may also store, process or back-up your personal information on servers that are located overseas (including through third party service providers). In some circumstances, we will also use third party service providers to carry out its functions and provide services.

## 5 DIRECT MARKETING

We may also use your personal information for the purpose of marketing its services. If you do not want to receive marketing material from us, you can contact us as detailed below:

- for electronic communications, you can click on the unsubscribe function in the communication; or
- for hard copy communications, you can email [hr@rxpservices.com.au](mailto:hr@rxpservices.com.au); or
- through our contact details under 7.

## 6 PRIVACY ON OUR WEBSITE

Like most websites, RXP collects non-personally identifying information of the sort web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. RXP's purpose in collecting non-personally identifying information is to better understand how RXP's visitors use its website. From time to time, RXP may release non-personally identifying information in the aggregate (i.e. by publishing a report on trends in the usage of its website).

RXP also collects potentially personally identifying information or personal information, for example IP addresses for logged in users and for users leaving comments on our blogs. RXP only discloses logged in user and commenter IP addresses under the same circumstances that it uses and discloses personally identifying information or personal information as described in this policy, except that blog commenter IP addresses are visible and disclosed to the administrators of the blog where the comment was left.

### 6.1 Cookies and Web Beacons

In some areas of the website, RXP employs 'cookies' (small data files that are sent to your computer) to improve your experience of the website. However, these are not used to track individuals or record information about you. The use of 'cookies' is now a fairly standard operating procedure for most websites. Please configure your browser accordingly to permit you to reject or disable the cookies if you wish. Please note however that certain parts of the website may not work properly if you decide to do so. As you may know, cookies are small text files placed on your computer when you first visit the site.

A web beacon is a clear picture file that is placed on a website or in an email that is used to monitor the behaviour of a user visiting the website or sending an email. When the HTML code for the web beacon points to a site to retrieve the image, at the same time it can pass along information such as an IP address

of the computer that retrieved the image, the time the web beacon was viewed and for how long, the type of browser that retrieved the image and previously set cookie values.

You have several choices regarding your use of our websites. In general, you are not required to provide personal information when you visit our websites. However, if you apply to receive information about our services and industry updates or wish to apply for a position with us, provision of certain personal information will usually be required.

## 6.2 Third Party Websites

Our websites may contain links to third parties' websites. Those other websites are not subject to our privacy policy. You will need to review those websites to view a copy of their respective privacy policy. We do not endorse, approve or recommend the services or products provided on third party websites.

## 6.3 Ads

Ads appearing on any of our websites may be delivered to users by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies and web beacons by RXP and does not cover the use of cookies and web beacons by any advertisers. Currently RXP does not use any advertising on its web site.

## 6.4 Spam/Comments

Generic comments and other non-specific content (i.e. spam) submitted to our helpdesk service are not saved on our servers unless they were marked as false positives, in which case we store them long enough to use them to improve the service to avoid future false positives.

# 7 ACCESSING YOUR PERSONAL INFORMATION

You can request access to your personal information, subject to some limited exceptions permitted or required by law. Such request must be made in writing to the Privacy Officer. Please note the table with the contact details of the Privacy Officer.

<b>Title</b>	Privacy Officer
<b>Email</b>	<a href="mailto:hr@rxpservices.com.au">hr@rxpservices.com.au</a>
<b>Phone</b>	+61 3 8630 5800

# 8 UPDATING YOUR PERSONAL INFORMATION

If you believe any personal information, we have collected about you is inaccurate, not up-to-date, incomplete, irrelevant or misleading, you may request correction. To do so, please contact the Privacy

Officer, as per the above table and we will take reasonable steps to correct it in accordance to the requirements of the Privacy Act.

## 9 HOW TO MAKE A COMPLAINT

A person may make a complaint if they feel their personal information has been handled inappropriately by us under the Privacy Act. In the first instance, complaints must be directed to Privacy Officer in writing. We will investigate the complaint and prepare a response to the complainant in writing within a reasonable period. Where appropriate, will advise you of the general reasons for the outcome of the complaint.

In some circumstances, the Privacy Officer may decline to investigate the complaint (i.e. if the complaint relates to an act or practice that is not an interference of the privacy of the person making the complaint). If you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.

### a. Exemption

There is an exemption in the Privacy Act regarding information relating to a current or former employee. The Privacy Act does not apply to an act done or practice we engage in concerning:

- A current or former employment relationship between us and the individual; and
- An employee record we hold about the individual (including personal information about the employment relationship including information, such as recruitment/termination information, terms and conditions of employment, health and banking details).

This exemption does not apply to applicants who are unsuccessful in securing a role at RXP. In those cases, we will take all the necessary steps to ensure proper collection, use, storage, disclosure of and access to information in accordance with the Privacy Act and other applicable laws.

## 10 PRIVACY POLICY CHANGES

All information is managed in line with APPs and has been completed with compliance to the Privacy Act and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)*.

Although most changes are likely to be minor, RXP may change its Privacy Policy from time to time, and at RXP's sole discretion. RXP encourages visitors to frequently check with RXP for any changes to its Privacy Policy.

**Change Log:**

*Version 1.0 – March 2013, Maria Dimopoulos*

*Version 1.1 – September 2015, Maria Dimopoulos*

*Version 1.2 – June 2016, Maria Dimopoulos*

*Version 1.3 – December 2019, Maureen Tanamas*

<b>BMS</b>	PO.PC.004 Privacy Policy
<b>Approver</b>	Maria Dimopoulos, Group Executive - People & Culture
<b>Endorsed by</b>	Ross Fielding, CEO
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