

PRIVACY POLICY

1. PURPOSE

The Construction Training Centre (CTC) (ABN 66 673 126 160) respects your privacy and is committed to protection of any information you provide to us, or we collect on you and to being transparent with you with respect to your data. We are bound by the Australian Privacy Principles of the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cwth), the Privacy Amendment (Notifiable Data Breaches) Act and the Privacy Regulation 2013.

This privacy policy explains why and when we collect your personal information, and what use CTC makes of that information. The policy also outlines where and why your information may be disclosed to third parties, and the security measures used by us to help protect your personal information.

It specifically describes –

- Why and when CTC collects your information
- How CTC uses your information
- Disclosure of your information to third parties
- Accuracy / Access
- Security
- Data breaches
- Changes

CTC reserves the right to amend this policy from time to time. To view the latest version of policy, visit the CTC website and search for Privacy Policy.

2. SCOPE

This Privacy Procedure extends to and covers all operations and functions of CTC. Management, employees and/or any other third parties who have access to and/or utilise personal information collected and/or held by CTC are required to abide by this Privacy Policy.

3. APPLIES TO

This procedure applies to all:

- Management
- Employees
- Sub-Contractors

4. DEFINITIONS

- APPs – Australian Privacy Principles
- IPPs – Information Privacy Principles
- OAIC – Office of the Australian Information Commissioner

5. RELATED LEGISLATION

- Privacy Act 1998
- Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)
- Privacy Regulation 2013
- Public Records Act 2002
- Education (General Provisions) Act 2006
- Education (Queensland Studies Authority) Act 2002

6. RESPONSIBILITIES

The Construction Training Centre **Chief Executive Officer** has overall responsibility for the implementation of this procedure.

7. RELATED DOCUMENTS AND RECORDS

- PRO-021 Data Breach Response Procedure

8. POLICY

8.1 Why and when CTC collects your information

We collect information you give us either online or by email, post, facsimile, face to face, over the phone or through our marketing company or industry stakeholders. In most cases, the personal information CTC will collect from you is the personal information required in order to provide services to you, and also for ongoing management and support of those services. This information includes your full name, mailing address, phone number, email address, ABN and facsimile number. We also collect your payment details such as your credit card number or bank account details. We may also collect information in relation to the credit worthiness of your company in consideration of entering into a lease agreement (including a Hot Lease). This information shall only be collected from parties whose contact details you have provided to us and only with your express written consent.

Internally CTC will collect information on its employees in order to conduct our business and these records are kept for statutory periods in a secure location as required by various Government Agencies including the ATO. Details of individuals including phone and email information may be given to providers to CTC where this is needed for the purposes of delivering specific services e.g. where CTC provides health checks including but not limited to, general health and well-being test, hearing tests, influenza injections and skin tests. The information you provide to these companies is their responsibility and they must comply with the APPs. CTC only engages service providers who give assurance that they are fully compliant with the APPs. Information provided to CTC from such testing is aggregated and is for overall service review purposes and has no individual information included.

CTC makes limited use of cookies on this website. A cookie is a small message given to your web browser by our web server in order to store information about user preferences. We use cookies to provide information on our product offerings through content networks across the internet, to track your interaction with our website and to personalise your experience on our website. You always have the option to disable cookies by turning them off in your browser but you may find that this reduces

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the functionality of our website. This information is not used to ascertain your identity or identify any of your personal details.

8.2 How CTC uses your information

We collect and use your personal information to deliver our services to you. This will include provision to you of leasing and maintenance/technical services, billing and credit control, renewal notices, maintenance notices, system changes, health and safety and security notices and other functions relevant to your agreements with us.

We may use your information to provide regular information to you to alert you to safety and security matters, relevant updates on new issues arising on the Precinct and to elicit your views from time to time. We may use your information to provide to a third-party provider in order to undertake market research in line with your role as an industry stakeholder. We may use your information to contact you for marketing purposes including but not limited to new services, promotions, give-aways, via email, telephone, fax, digital and mobile platforms including a range of social media. If you do not wish to receive any marketing communications from CTC, you may opt-out and stop the delivery of future promotional material from us by following the special instructions in the email you receive or directly to us in relation to digital platforms and social media. These instructions will tell you how to remove your name from our promotional list.

We may monitor telephone conversations with you in order to facilitate staff training and to maintain our high levels of customer service. We will always inform you prior to any telephone conversation which is monitored in this way to obtain your prior approval.

8.3 Disclosure of your information to third parties

We may supply your personal information to third parties to perform services on our behalf, such as:

- the distribution of marketing information to you (except where you have chosen to opt out of receiving this information from us);
- the use of surveys and other information gathering techniques to garner information from you as an industry stakeholder; and
- gathering information for the purpose of improving our service offerings to our customers and to attract new customers.

Our relationships with such third party service providers are governed by our contracts with them. Those service contracts contain privacy and confidentiality provisions which are consistent with the APPs where they are not based in Australia. Australian-based companies used will be compliant with the APPs.

8.4 Accuracy / Access

You may access and update the personal information we hold on you.

If you believe that CTC may hold other personal information about you which is inaccurate, or you wish to change or update any of the personal information you have provided, please contact us emailing our Privacy Officer at info@constructiontrainingcentre.au.

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8.5 Security

The transfer of information across any media may involve a certain degree of risk, and the Internet is no different. However, helping you to keep your information secure is very important to CTC. Information is stored on secure CTC servers which are backed-up offsite with our IT provider (Rivercity Solutions). CTC does not currently use an overseas cloud solution for any data storage.

If a breach of personal data is suspected, measures are taken immediately to contain the breach and to mitigate the harm. We will determine if it was isolated or systemic and identify affected individuals. We will notify those affected immediately to enable them to take steps to lessen the risk of serious harm as a result of the data breach. We will offer assistance including steps the individual can take to avoid or reduce the risk of harm or to further protect themselves.

Individuals can lodge a complaint with the Office of the Australian Information Commissioner (OAIC) if they are dissatisfied with CTC's response to the data breach.

8.6 Specific Compliance with the Australian Privacy Principles (APPs)

APP 1 - Openness

CTC collects and organises information that is relevant to the requirements of the organisation. CTC collects basic and confidential information (e.g. such as, addresses, bank details, email address and contact numbers) that is required for the services of the business.

A person has the right to inquire about their personal information being held by CTC unless it is subject to exemption by law. It is our aim to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. In the event that a person is not satisfied with CTC's response in revealing or disclosing this information, the person has the following recourse:

- The person has the right to request from CTC an explanation for why the information has not been provided;
- CTC must provide a written statement explaining the grounds for any non-disclosure in a reasonable time period.
- If the complainant remains dissatisfied the matter can be referred to the Office of the Australian Information Commissioner for review.

CTC will only transfer personal information to a recipient in a foreign country in circumstances where the information has appropriate protection and a person has consented to such a transfer of personal information. The privacy policy is available to applicants on request and through the CTC website free of charge.

APP 2 - Anonymity and Pseudonymity

Due to the nature of CTC services, persons cannot interact anonymously or under a pseudonym with CTC. CTC requires basic information to be collected and maintained to ensure quality service.

APP 3 - Collection of solicited and personal information

Collection of personal and sensitive information by CTC will be fair, lawful and non-intrusive. Information will primarily be collected through application forms. Further information will not be sought unless the originally sourced information hinders the service of the business.

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APP 4 - Dealing with unsolicited personal information

CTC will take reasonable steps to protect the personal information it holds from misuse and loss as well as from unauthorised access modification or disclosure. CTC will also take reasonable steps to de-identify or destroy unsolicited personal information that is not required in the service of the business or contained in a Commonwealth record.

APP 5 - Notification of the collection of personal information

CTC will notify individuals through its Privacy Collection Statement that their information will be collected and stored by CTC as necessary for the service of the business. On request by an individual, CTC will correct personal information it holds about that person, except, for example, where it is likely to compromise the privacy of another person or it is detrimental to public and/ or individual health and safety interests. See APP1 for the appeals process.

APP 6 - Use or disclosure of personal information

CTC will only use or disclose personal information for the purpose for which it is collected unless an individual has formally consented to an alternative use of the information. CTC will only provide personal information to third parties where there is a clear and enforceable legal requirement to do so.

APP 7 - Direct marketing

CTC will only use or disclose personal information for direct marketing purposes if the individual has consented to their personal information being used for direct marketing, or has a reasonable expectation that their personal information would be used for this purpose. In cases where direct marketing will be used, an opt-out mechanism will be provided at the point of collection or shortly thereafter.

APP 8 - Cross-border disclosure of personal information

CTC will only transfer personal information to a recipient in a foreign country in circumstances where the information will have appropriate protection and a person has consented to such a transfer of personal information.

APP 9 - Adoption, use or disclosure of government related Identifiers

In most cases, CTC will not adopt, use or disclose a government related identifier unless:

- the use or disclosure is necessary for the organisation to fulfil its obligations to the agency or
- the organisation has been prescribed by regulations to use or disclose a prescribed identifier in prescribed circumstances.

APP 10 - Quality of personal information

CTC will take reasonable steps to ensure that the personal information it uses, collects or discloses is accurate, relevant, complete and up-to date. These qualities are essential to the information collected by CTC as the use and disclosure of information aligns with the services of the business.

APP 11 - Security of personal information

CTC will take reasonable steps to protect the personal information it holds from interference, misuse and loss and from unauthorised access modification or disclosure. If a data breach of personal information is suspected, immediate action is taken to mitigate the risk of harm. CTC will also take reasonable steps to destroy any personal information no longer needed for the purpose for which it was collected. Information may continue to be stored in cases where:

- the personal information is contained in a Commonwealth record, or

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- the organisation is required by or under an Australian law or a court/tribunal order to retain the information.

APP 12 - Access to personal information

CTC will give any individual access within a reasonable period of time to the personal information that it holds about that individual, unless an exemption applies. In addition, CTC will provide access in the manner requested by the individual if it is reasonable to do so. See APP1 for the appeals process.

APP 13 - Correction of personal information

CTC will take reasonable steps to correct personal information to ensure it remains complete, accurate and up-to-date. Action will be taken in situations where:

- CTC is satisfied that personal information needs to be corrected, or
- an individual requests that their personal information be corrected.

CTC will also ensure that in cases where a correction is made, entities provided with the information will be notified if requested by the individual. A refusal to correct the information will be followed by a written statement of explanation as outlined in APP 5 within a reasonable timeframe of the original complaint being made and free of charge to the individual.

CTC is committed to reviewing this policy whenever there is a complaint or concern raised or on an at least annual basis through its Focus (ISO9001) management system.