# **Privacy Policy**

This Privacy Policy is Telads Australia Pty Ltd official privacy policy and it applies to all personal information collected by Telads Australia Pty Ltd, Level 20, 644 Chapel Street South Yarra Vic 3141. In this policy we explain how and why we collect your personal information, how we use it, and what controls you have over our use of it and what you can do in case of any dispute. This Privacy Policy outlines how we manage personal information that we collect and handle about you as a customer, supplier, visitor to our site, a job applicant or if someone engages with us via social media, other digital services, correspondence or in person as a member of the public.

Telads Australia Pty Ltd is committed to complying with Australian privacy legislation and to protecting and safeguarding your privacy when you deal with us.

#### **Privacy and Information Protection:**

We follow the Australian Privacy Principles (APPs) as detailed in the Privacy Act 1988 and the Australian Crime Commission Act 2002. Additionally to these requirements we subscribe to the Office of the Australian Information Commissioner (OAIC), whose function is in managing privacy advice, facilitating investigations, complaints and administration with regards to the application of the Privacy Act. The APP's outline how Australian Government agencies, private sector and not-forprofit organisations, health service providers and small businesses must handle, use and manage personal information. Personal information means any information or opinion about an individual, or an individual who is reasonably identifiable and may cover APPs principles as outlines in this privacy policy. We provide;

- Open, transparent management of personal information.
- The right for individuals to access and correct their personal information while ensuring we are keeping your personal information secure.
- Provide the option of dealing with Telads Australia Pty Ltd anonymously. However, this only applies where it is practical for Telads Australia Pty Ltd to deal with you acting anonymously or under a pseudonym, such as a general enquiry.
- The collection of solicited personal information and receipt of unsolicited personal information including giving notice about collection.
- Information on how personal information can be used and disclosed.
- Security measures which maintain the quality of personal information.

### Collecting and disclosing information to other organisations:

Telads Australia Pty Ltd is an accredited body of The Australian Criminal Intelligence Commission (ACIC) and this agreement sets out our obligations and requirements necessary for Telads Australia Pty Ltd to provide, maintain and delivery its products and services. Due to the nature of the products and services we provide, your personal information will only be obtained with your permission and consent and disclosed to third party suppliers including Nationally Coordinated Criminal History Check providers and law enforcement agencies. With respect to the disclosure of Police History Information to The Australian Criminal Intelligence Commission (ACIC), we will only disclose information and your data to those organisations, third-parties that you have expressly consented to for the purposes of conducting a Nationally Coordinated Criminal History Check (NCCHC) with the Australian Criminal Intelligence Commission (ACIC) and with Australian police agencies and National Police Checking Service (NPCS)

We will only collect your personal information if it is necessary for us to provide our function and services to you and will only collect your personal information electronically, through our secure online portal. The collection of any sensitive information will only be required where it is reasonably necessary for us to perform our functions and where an individual whom the sensitive information relates must consent to the collection. In order to submit your application for a Nationally

Coordinated Criminal History Check to the ACIC, we are required to collect Personal Information, (Your criminal record and an electronic copy of your face, to verify your identity), which is classified as sensitive information under the Privacy Act 1988 and the Australian Crime Commission Act 2002.

The kinds of personal information that Telads Australia Pty Ltd may collect from you, may include information such as name, address, phone number, email address, date of birth, drivers licence details, passport details, date of birth, residential addresses present and former of up to five (5) years history. Demographic information may all so be collected (for example, this includes employment information, age and gender and an applicant's marital status). We may also collect biometric information such as an applicant's signature (to collect consent for your application and an electronic copy of your face (to verify your identity). Additional personal information (ID documents) may be required to confirm you are the person making an application and you are providing informed consent to pass your personal information to a source such as (The Australian Criminal Intelligence Commission), who may pass your personal information to multiple other sources, in the case of a police check, police agencies in different jurisdictions.

The purpose of collecting your data is why you are applying for employment and you consent Telads Australia Pty Ltd to process you're application for a Nationally Coordinated Criminal History Check. We will collect from an applicant the purpose of your request and where you are applying for employment or a contracting role, we shall request information such as; the position and role you are requesting for the employer, the name of the employer and the location of your employment.

We may use or disclose personal information held about an individual for the primary purpose for which it is collected, including information related to your current or prior Nationally Coordinated Criminal History Check processes.

We may also use such information for a purpose related to the primary purpose of collection and where you would reasonably expect that we would use the information in such a way. This information is only disclosed to persons outside our business in the circumstances set out in this policy or as notified to you at the time of collection of the information and with your consent and enable us to confirm your identity, assess your application and make contact and communicate with you. We may be compelled by law to disclose your personal information to various authorities if we reasonably suspect unlawful activity has or is being or may be engaged and the use or disclosure is a necessary or is required in reporting the matter to the relevant authorities And where such use or disclosure is required under or authorised by law, for example, to comply with a, a warrant or other court orders or legal requirement.

We may use an electronic verification service (including a credit reference agency) to confirm your identity. By using our services you consent to this.

## We collect, hold, use and disclose personal information about you to:

Comply with our obligations under our agreement we have with the Australian Criminal Intelligence Commission regarding the National Police Checking Service.

To lodge your application and receive results of a Nationally Coordinated Criminal History check through the National Police Checking Service (NPCS) and to provide the results of your Criminal History check to you or to any other entity you duly authorise us;

To verify your identity is true and correct and to process credit card payments for our services.

Telads Australia Pty Ltd only operates within Australia and no data is gathered for the purposes of international information sharing or disclosure. Telads Australia stores all and any data within Australia.

The Australian Criminal Intelligence Commission (ACIC) needs to collect your personal information to conduct a Nationally Coordinated Criminal History Check (NCCHC) and does so through contractual arrangement with the accredited organisations. ACIC has contractual arrangements with Telads Australia Pty Ltd to collect personal information on its behalf to support processes assessing the suitability of people applying for employment. The information provided on this website will not be used without your prior consent for any purpose other than in relation to the assessment of your suitability for A Nationally Coordinated Criminal History check or to maintain the records of ACIC and police agencies; or for law enforcement purposes. For more information on the process or the handling of personal and police information, you can contact the ACIC's National Police Checking Service on:

By Phone 02 6268 7900 By Email: npcs@acic.gov.au

Online <a href="https://www.acic.gov.au/contact">https://www.acic.gov.au/contact</a>

## Minors and children's privacy:

For persons aged under 18 years of age, we will require parent or guardian consent, particular to conduct a Nationally Coordinated Criminal History Check (NCCHC) via The Australian Criminal Intelligence Commission.

## How we collect your information:

We only request and collect your personal information electronically, via our secure web application which is only accessible via our website. We do not process or accept any applications by post. We will only collect an applicant's personal information from you when you submit your application via our website and enter into arrangements with us. We will record, collect and hold information in relation to your transactions with us. We may record your communications with us for security, dispute resolution and training purposes.

#### **Disposal of Information:**

Under regulation and agreements some records for certain periods of time must be retained. In the case of a request for a Nationally Coordinated Criminal History Check and to maintain any required audit requirements, we are required to collect and retain records for a minimum period of not less than 12 months and information is deleted no more than 15 months following collection. We will only retain Police History Information for as long as required to fulfil our obligation requirements of The Australian Criminal Intelligence Commission (ACIC) agreement, or as otherwise contractually obligated. After the required retention period has passed information is de-identified and destroyed.

## Access to your personal information:

At all times Telads Australia Pty Ltd will provide check results, including any amendments promptly by email, within 24 hours of receipt of any check from (ACIC) or other related authorities or agencies. You have a right to access your personal information and we will provide you with information such as your name, address and contact details at any time and in a timely manner. If you believe that any information is incorrect you can also make contact with us at any time. If you wish to access information or to lodge a complaint about the privacy practices of Telads Australia Pty Ltd please put your request or complaint in writing and send it to:

Privacy Officer
Telads Australia Pty Ltd
Level 20, 644 Chapel Street South Yarra Vic 3141
Or send an email to: <a href="mailto:privacy@telads.com.au">privacy@telads.com.au</a>

#### **Security and Information storage:**

Telads Australia Pty Ltd places the upmost importance on the security of all information associated with our customers, clients and contractors. We have security measures in place to attempt to reasonably protect personal information under our control from interference, loss, unauthorised access or misuse. All personal information held is kept securely and held electronically on secure servers in controlled, secure Australian based facilities. Our data centres have full UPS power back up with diesel generators. Access is only via approved inducted personal with fingerprint pass and secondary pass code to approved inducted staff.

Telads Australia Pty Ltd retains the information you provide to us including your contact and credit card details to enable us to verify transactions and customer details and to retain adequate records for any legal, government and accounting purposes. This information is held on our secure Australian based servers in controlled facilities.

Information stored within our computer systems can only be accessed by those entrusted with authority and computer network password sanctions. No data transmission over the Internet can be guaranteed to be 100 percent secure. As a result, while we strive to protect users' personal information, Telads Australia Pty Ltd cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once Telads Australia Pty Ltd receives your transmission, it makes every reasonable effort to ensure its security. You are responsible for keeping your passwords and/or account information secret. You should be careful and responsible whenever you are online.

Telads Australia Pty Ltd is committed to and takes reasonable steps to maintain accurate, timely, relevant, complete and appropriate information about our customers, clients and website users. You may request access to personal information about you held by Telads Australia Pty Ltd. Requests for access to your personal information should be made to Telads Australia Privacy officer via email privacy@telads.com.au Verification of identity is required with a request to access (or update) personal information so that we can ensure your personal information is disclosed only to you. Inaccurate information will be corrected upon receiving advice from you. If we refuse to provide you with access to or correct the personal information held about you by us, then we will provide reasons for such refusal.

Telads Australia Pty Ltd will respond to any requests for access or correction within a reasonable time of receipt of the request, but by no later than 7 business days of the request being received.

## **Cookies:**

Cookies are data files that are downloaded from our web servers and stored on your hard drive. A cookie is a string of letters and numbers that uniquely identify the computer you are using and the Username and password you may have used to register at our site.

Two types of cookies are used .The first tracks a visitor's on our site which allows us to see at a glance which pages and information you may have visited. The second type of cookie is related for the actual time you have visited the site. Cookies can be deleted from your hard drive at any time.

## Disputes:

Any dispute must be raised directly through Telads Australia Pty Ltd and should the dispute relate to a Nationally Coordinated Criminal History Check and the Applicant wishes to proceed with a dispute, the Applicant should;

Raise their concern regarding the check result with Telads Australia Pty Ltd via our email; helpdesk@readycheck.com.au and we shall provide the Applicant with a Dispute form and respond to any complainant concern within 2 working days from receipt of complaint.

Telads Australia will send the completed Dispute Form to the National Police Checking Service on the same business day that we receive the form.

The National Police Checking Service will then review the check result. Your dispute is investigated by police agencies and a dispute response can take between 1 and 14 days, depending on complexity.

The Applicant will receive the result of the dispute as soon as the review is complete.

## **Complaints:**

If you wish to complain at any time about the handling, use or disclosure of your personal information just write to us at the following address:

Telads Australia Pty Ltd Level 20, 644 Chapel Street South Yarra Vic 3141

Or send an email to: <a href="mailto:privacy@telads.com.au">privacy@telads.com.au</a>
Or call our office on (03) 9913 0500

We will investigate your complaint and advise you of the outcome as soon as possible. If the matter is not resolved to your satisfaction you can then refer you complaint to the Office of the Australian Information Commissioner who can be contacted through the following detail;

Phone enquiries	<u>1300 363 992</u>
	Mon-Thurs
	10am-4pm AEST/AEDT
Online enquiries	https://www.oaic.gov.au/about-us/contact-us
FOI requests	Email to <a href="mailto:foi@oaic.gov.au">foi@oaic.gov.au</a> or mail to the postal address below.
Post	GPO Box 5218
	Sydney NSW 2001
Fax	+61 2 9284 9666
Street address	175 Pitt Street Sydney NSW 2000
	In-person enquiries by appointment only

We are bound by the Privacy Act 1988 (Cth). Further information on The Office of the Australian Information Commissioner (OAIC) can be found via their website https://www.oaic.gov.au/ and The APP privacy policy guide can be found at https://www.oaic.gov.au/privacy/guidance-and-advice/guide-to-developing-an-app-privacy-policy/

## Refund policy:

We will only provide you with a refund in the event we are unable to continue to provide the service or at our absolute discretion and consider it is reasonable to do so under the circumstances.

## **Changes to this Privacy Policy:**

We reserve the right to change, modify or update this privacy policy from time to time to take into account of any new laws and or changes to our functions and activities. If at any time we update or change our privacy we shall post the revised version on our website.