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Prepared By
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N. Hodges

Title
BlueZone Group Privacy Statement

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Change Record

Revision	Date	Change
1.0	28 September 2015	Formal issue
1.1	03 September 2024	Updated header & footer to current BlueZone template style. Added table of contents and updated formatting.

1 Purpose and Scope

The purpose of this document is to outline BlueZone Group Pty Ltd Privacy Statement. BlueZone Group Pty Ltd is obligated under the Australian Privacy Amendment Act 2012 to comply with the 13 Australian Privacy Principles (APPs) when protecting and managing all employee and client personal information. This statement outlines the actions implemented to ensure all practices within the organisation are compliant with the Act.

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2 Privacy

2.1 Privacy statement

BlueZone Group takes privacy seriously and is covered by the 13 Australian Privacy Principles (APPs) set out in the Privacy Amendment (Enhancing Privacy Protections) Act 2012. To comply with our obligations under the APPs BlueZone Group have a Privacy Policy, which outlines how BlueZone Group manages privacy within the organisation.

2.2 Privacy Compliance Officer

The BlueZone Group Pty Ltd Privacy Compliance Officer is the Chief Executive Officer. The Chief Executive Officer will be the first point of contact for all privacy issues, including handling access requests and complaints should they arise.

2.3 Privacy and Confidentiality

As responsible corporate citizens we understand the importance of confidentiality. This part of the obligation remains unchanged by this privacy policy. The Privacy Policy highlights BlueZone Group's customers and employees right to privacy and is independent of our contractual and ethical obligations.

2.4 Personal Information

BlueZone Group Pty Ltd collects personal information from employees and customers for marketing, sales and service requirement purposes.

2.4.1 Company Employees

- Full Name
- Date of birth
- Address

- Next of Kin
- Contact Information (phone, e-mail)
- Occupation
- Career history and career plans
- Results of aptitude and other tests
- Tax file numbers
- Superannuation details
- Banking details
- Performance reviews
- Resumes
- References
- Training and qualification details

2.4.2 Customers

- Company Trading Name
- Company ABN
- Company address and contact information
- Trading record
- Trading references
- Details of Directors
- Sales trading history
- Purchasing history from BlueZone Group
- Meeting records between BlueZone Group and client
- Phone call and e-mail records between BlueZone Group and client.

2.5 Collection of information

BlueZone Group collects personal information in order to provide commercial services to our customers, and to maintain legitimate employee and client records. The majority of personal information collected by BlueZone Group is securely stored in our CRM and ERP systems.

BlueZone Group does not collect sensitive information, (as defined in the Privacy Act). If sensitive information is required, BlueZone Group will provide the reason for requesting this information and only proceed with the employee or client's consent.

2.6 Access to your personal information

BlueZone Group Pty Ltd provides access to the personal information about employees and customers. Access will be provided in accordance with the Access and Correction Policy. If you require access to your personal information, please contact the BlueZone Group Privacy Compliance Officer.



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2.7 Complaints

If you have any complaints about our privacy practices or wish to make a complaint about how your personal information is managed, please contact the BlueZone Group Privacy Compliance Officer. Complaints will be handled iaw the BlueZone Group Pty Ltd Privacy Policy.

2.8 Storage, review and disposal

BlueZone Group takes all reasonable steps to protect the security of the personal information that we hold. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

Personal information that BlueZone Group collect, use, or disclose on an employee will be reviewed during the employee's review to ensure the information is accurate, up-to-date, relevant, and complete. Any changes or corrections required to the information held may be made at that time, or when identified or requested.

Any information held by the company that is no longer needed for an authorised purpose will be reasonably destroyed or de-identified, subject to the exceptions defined in APP 11. This includes any information, such as interview notes, held by the company on candidates making application for employment with the company.

2.9 Contract

If BlueZone Group Pty Ltd does contract out services, we will take measures to protect the information by including contractual provisions in any agreements. (Refer to the BlueZone Group standard contractor clauses with respect to privacy).

2.10 What happens if you choose not to provide the information

You are not obliged to give provide your personal information. However, if you choose not to provide BlueZone Group Pty Ltd with personal details, we may not be able to provide employees or customers with our full range of support and services.

2.11 Disclosure of personal Information

The information collected by BlueZone Group is strictly confidential. BlueZone Group consultants will not reveal, disclose, sell, distribute, rent, licence, share, or pass that information to third party contractors. If required, BlueZone Group consultants may pass on relevant information to provide services to the company. Third parties are contractually bound to impose similar restrictions to BlueZone Group's Privacy Policy. BlueZone Group

- However, BlueZone Group may disclose personal information, other information, or data we collect from you for the purpose specified at the time of collection or for other purposes if: You would reasonably expect us to disclose such information for that purpose,
- That purpose is related to the purpose specified to you at the time of collection.

2.12 Sources of information

Where possible, BlueZone Group will solicit and collect information directly from BlueZone Group customers, or directly from BlueZone Group employees.

If personal information about an individual was not solicited by BlueZone Group, or not collected from the individual but from another party, BlueZone Group will advise that individual of the collection and provide the other party with the BlueZone Group Privacy Policy. Unsolicited personal information will only be retained if reasonably necessary and with consent from the individual and will be given the same privacy protection as solicited personal information, as defined in the APP 4.



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2.13 Website use of cookies

A cookie is a small message given to your web browser by our web server. The browser stores the message in a text file, and the message is then sent back to the server each time the browser requests a page from the server.

BlueZone Group make limited use of cookies on our website. The use cookies is to improve the functionality of the BlueZone Group website, not to store personal information. BlueZone Group only uses cookies during marketing process. The cookies are used to keep track of the details of a request. After the request is sent, the cookie or cookies will be deleted.

Most Internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to notify you each time a cookie is sent to your computer, giving you the choice whether to accept it or not.

2.14 Security

BlueZone Group uses a variety of physical and electronic security measures including restricting physical access to our offices, firewalls and secure databases to keep personal information secure from misuse, loss, unauthorised use or disclosure, and interference. The internet is not a secure environment. If you choose to send BlueZone Group any information, including your email address, it is sent at your own risk.

3 Access and Correction Policy

This policy is directed to those individuals whose personal information is held by BlueZone Group Pty Ltd.

3.1 Purpose

The purpose of this Policy is to set out how BlueZone Group Pty Ltd provides access to and correction of your personal information. The Policy is part of BlueZone Group's Privacy Policy and our desire to provide for, maintain and give effect to your right to privacy.

3.2 Overriding principles

At all times the conduct under this Policy will be governed by the following principles:

- All requests for access or correction will be treated seriously,
- All requests will be dealt with promptly,
- All requests will be dealt with in a confidential manner.

Your request to access or correct your personal information will not affect your existing obligations or effect the commercial arrangements between you and BlueZone Group Pty Ltd.

3.3 Form of access

Employee private information will be stored and accessible to you, via our online EPR system (Business Central).

For any other information, you can make a request to access the information in writing by contacting the BlueZone Group Privacy Compliance Officer.

3.4 When will access or correction be denied?

Where possible, BlueZone Group will provide access in the manner requested by the individual if reasonable to do so. Where there is a refusal or dispute about the right or forms of access or correction, the company will provide the individual with written reasons. These will be dealt with in accordance with the BlueZone Group Grievance Procedure.

Access will be denied if:

- the request does not relate to the personal information of the person making the request;

- providing access would pose a serious and imminent threat to life or health of a person;
- providing access would create an unreasonable impact on the privacy of others;
- the request is frivolous and vexatious;
- the request relates to existing or anticipated legal proceedings;
- providing access would prejudice negotiations with the individual making the request;
- access would be unlawful;
- denial of access is authorized or required by law;
- access would prejudice law enforcement activities;
- access discloses a 'commercially sensitive' decision making process or information; or
- Any other reason that is provided for in the Australian Privacy Principles (APPs) set-out under the Privacy Act.

3.5 Time

BlueZone Group will take all reasonable steps to provide access **within 30 days** of a submitted request. In cases where the request is not complicated or does not require access to a large volume of information, BlueZone Group will provide information **within 14 days**.

3.6 Costs and charges

BlueZone Group Pty Ltd will impose the following charges:

- Photocopying,
- Delivery cost of information stored off-site - where information is stored off-site, the cost of obtaining access to the information,
- Access to electronic databases,
- Any other fees as may be applicable at the time of request.

BlueZone Group will make these fees and charges known to the individual prior to processing their request. Costs and charges will not apply to the making of the request, for correcting the personal information, or for associating the statement with the personal information.

4 Privacy Complaints

4.1 Introduction

BlueZone Group Pty Ltd sees the privacy to the organisation, its customers and other stakeholders. As such BlueZone Group Pty Ltd is committed to protecting the privacy of the personal information that is received and stored. This is part of our organisations:

- Legal obligations under the Privacy Act 1988
- Ethical and business obligations
- Service to you

BlueZone Group Pty Ltd places high priority on effectively dealing with any complaints about privacy.

4.2 Overriding principles

BlueZone Group Pty Ltd is committed to handling complaints quickly and fairly. At all times the conduct under this policy will be governed by the following principles:

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- All complaints will be treated seriously
- All complaints will be dealt with promptly
- All complaints will be dealt with in a confidential manner

The privacy complaint will not affect your existing obligations or the commercial arrangements that exist between you and this organisation.

4.3 Who may complain under this policy?

If you have provided BlueZone Group with personal information, you have a right to make a complaint, have it investigated and dealt with under this policy.

4.4 What is a privacy complaint?

A privacy complaint relates to any concern or dispute that you have with our privacy practices as it relates to your personal information. This could include matters such as:

- How personal information is collected
- How personal information is stored
- How this information is used or disclosed
- How access is provided

4.5 What do I do if I have a complaint about privacy practices?

BlueZone Group Pty Ltd resolves grievances at the local level if possible. If you have a complaint about privacy, please contact the BlueZone Group Privacy Compliance Officer, or advise your usual recognised BlueZone Group contact. The BlueZone Group contact will forward your complaint to the BlueZone Group Privacy Compliance Officer.

You may complain orally or in writing. The BlueZone Group Privacy Compliance Officer will have the authority to resolve your complaint.

4.6 Anonymity and pseudonymity

BlueZone Group will do its best to deal with anonymous or pseudonym complaints from clients or employees, although we may not be able to investigate fully and follow-up such complaints. However, in the event that an anonymous or pseudonym complaint is received BlueZone Group will note the issues raised and try and resolve them appropriately.

4.7 Grievance procedure

The goal of this policy is to achieve an effective resolution of your complaint within a reasonable set timeframe of approximately 28 days or as soon as practicable.

Once the complaint has been made, and the matter is in the hands of the BlueZone Group Privacy Compliance Officer, the matter can be resolved in a number of ways.

4.7.1 Request further information and investigation

The BlueZone Group Privacy Compliance Officer may request further information regarding the complaint. Prepare to give as many details as possible including details of any relevant dates and documentation. This will enable BlueZone Group to investigate the complaint and determine an appropriate and useful solution. All details provided will be kept confidential.

The complaint may be investigated. The organisation will try to do so as soon as possible. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.



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4.7.2 Discussion options:

4.7.3 BlueZone Group will discuss the options for a resolution.

If you have suggestions about how the matter might be resolved, these can be discussed with the BlueZone Group Privacy Compliance Officer. The BlueZone Group Privacy Compliance Officer may also suggest alternative solutions or provide examples of how the personal information can be revised or stored. Refer to Managing Director Operations.

If your complaint is not resolved at the local level, it will be referred to the BlueZone Group Managing Director. The Managing Director is provided with the history and may discuss the complaint with the employees, or other parties involved.

4.7.4 Resolution

You will be informed of the outcome and the reasons for the decision. If this does not resolve the complaint, the matter will be referred to a mutually agreed intermediary.

If the above steps have been followed, and you are still dissatisfied with the outcome you may refer the complaint to the Federal Office of the Privacy Commissioner.

4.8 Information

For any further information about this policy please contact the BlueZone Group Privacy Compliance Officer.