

PRIVACY POLICY

BACKGROUND

SensOre Ltd (**SensOre** or the **Company**) is committed to protecting and safeguarding privacy.

The Company is currently governed by the Australian Privacy Principles under the Privacy Act that requires that organisations which hold Personal Information about people, handle that information responsibly.

The purpose of this privacy policy is to set out how the Company collects, uses, discloses and stores Personal Information.

WHO IS COVERED BY THE POLICY?

This policy applies to all directors, management, staff and contractors engaged and undertaking work on behalf of the Company, wherever they may be located, and all dealings with third parties including private organisations, individuals or any representatives of such persons (collectively referred to as personnel in this policy).

DEFINED TERMS

In this policy:

Personal Information means information, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained from that information, regardless of its source.

Privacy Act means the *Privacy Act 1998* (Cth) as amended or re-enacted from time to time.

Sensitive Information means:

- information or an opinion about an individual's:
 - racial or ethnic origin;
 - political opinions;
 - membership of a political association;
 - religious beliefs or affiliations;
 - philosophical beliefs;
 - membership of a professional or trade association;
 - membership of a trade union;
 - sexual orientation or practices; or
 - criminal record,that is also personal information;
- health information about an individual;
- genetic information about an individual that is not otherwise health information;
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- biometric templates.

TYPE OF PERSONAL INFORMATION

The type of Personal Information the Company may collect about its personnel may include (but is not limited to):

- name, date of birth, citizenship, gender, driver's licence number, passport number and other identification;
- any information contained on a CV (such as employment history, education and qualifications);
- the results of police checks/criminal records and background checks;
- recruitment, engagement, termination or training records;
- information about terms and conditions of employment;
- personal and emergency contact details;
- performance, conduct or disciplinary records, including performance reviews;
- information about hours of employment;
- remuneration and bonus details;
- information about membership of a professional or trade association;
- information about trade union membership;

PRIVACY POLICY

- annual, long service, sick, personal, parental and other leave records;
- taxation, banking and superannuation information;
- work health and safety records;
- health information related to employment (such as a medical condition or an assessment of fitness for duty); and
- any other information provided by the Company's personnel.

The Personal Information the Company may collect listed above includes Sensitive Information.

The Personal Information that the Company collects in relation to its personnel is necessary for the proper and effective management of employment. If the Company's personnel do not provide complete and accurate Personal Information as and when required by the Company, there may be potentially serious consequences for the personnel and, depending on the circumstances, their future employment relationship with the Company.

COLLECTION OF PERSONAL INFORMATION

The Company will generally collect Personal Information:

- directly from personnel when they provide their details to the Company (including in forms, face to face meetings, interviews, registration and attendance at seminars, business cards and telephone conversations);
- indirectly through the conduct of the business of the Company and employment, including through emails and through use of services and facilities available through the Company's websites;
- from clients when the Company receives their feedback on the performance of personnel;
- from others, if the Company receives information about criminal records or health information related to the employment of personnel, with the consent of the relevant person;
- from others, including a safety regulator, if it receives information about a workplace incident or accident in which personnel are involved; and
- from others, if the Company receives information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which personnel are involved.

USE AND DISCLOSURE OF PERSONAL INFORMATION

The Company collects, uses and discloses Personal Information of its personnel to operate the Company's business and administer employment or working relationships with the Company. This includes:

- the Company's administration and management of employment (including performance management and to verify compliance with the Company's policies and procedures);
- the Company's business planning and forecasting;
- the Company's management of any complaint, investigation, inquiry or insurance claim in which personnel are involved; and
- the Company's compliance with its legal obligations.

The Company may disclose the Personal Information of its personnel to:

- a related body corporate;
- external service suppliers who supply administrative, personnel, financial, medical, legal, industrial or other services to the Company, such as:
 - payroll administrators;
 - IT service providers;
 - recruitment and personnel agencies;
 - medical practitioners;
 - legal advisors;
 - training providers; and
 - organisations which distribute information on behalf of the Company;
- superannuation trustees or administrators;
- external parties reference checking previous employees, contractors or workers;
- the Company's insurers;

- a worker's compensation body;
- courts, tribunals and regulatory authorities as agreed or as authorised by law; and
- anyone authorised by the Company's personnel.

STORAGE AND PROTECTION OF PERSONAL INFORMATION

The Company will take all reasonable precautions to protect the Personal Information of its personnel from loss, misuse and interference, and unauthorised access, modification or disclosure.

The Company stores the Personal Information of its personnel in a combination of secure computer storage facilities and paper-based files and other records. The Company may store the Personal Information with a third party storage provider.

ACCESS TO PERSONAL INFORMATION

If personnel would like to request to access or correct their Personal Information, they should contact the company secretary. The Company may need the relevant person to complete an application form verifying their identity and specifying what information they require or wish to correct. In some circumstances, where permitted by law, a request for access or correction may be refused. In such circumstances, the Company will give a written notice outlining the reasons for refusal (unless it would be unreasonable to do so).

Whilst the Company will not charge personnel a fee to make a request to access Personal Information, the Company may charge a fee that will reflect the Company's reasonable administrative, postage and handling costs of responding to the request. If the information sought is extensive, the Company will advise the likely cost in advance and can help to refine the request if required. The Company will not charge personnel to correct their Personal Information.

MAKING A COMPLAINT

If personnel believe that the Company has breached their privacy, they can make a complaint to the company secretary. The Company will ask the relevant person to put their complaint in writing and may ask them to verify their identity.

The Company will consider and respond to the complaint within a reasonable period after they receive it. Depending on the nature and length of the complaint, this will usually be within 30 days.

The Company will consider the complaint and provide the relevant person with its response.

POLICIES AND REPRESENTATIONS

This policy is not a term of any contract, including any contract of employment and does not impose any contractual duties, implied or otherwise, on the Company. The policy may be varied from time to time.

DOCUMENT CONTROL

REVIEW LOG

Last Review Date	Reviewer	Next Scheduled Review Date

CHANGE LOG

Version	Brief description of change	Approval Date	Approver
1	Initial version drafted	17 August 2021	Board