

**Board Paper**

**Privacy Policy**

Monday, 16 May 2022

**Purpose**

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The Board will consider the proposed adoption of the Privacy Policy, as set out in Attachment 1 to this paper.

**Action Requested**

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The Board is asked consider the Privacy Policy, and if appropriate, resolution to approve the adoption of this Policy.



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# **Privacy Policy**

**Wiseway Group Limited**

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## Overview

This is the Privacy Policy of Wiseway Group Limited ("WiseWay") (ACN) 624 909 682. We are committed to protecting your personal information and your right to privacy.

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## Scope

This Privacy Policy governs the privacy policies and practices of Wiseway Group Limited ("WiseWay", "Company") and also encompassing our products ("System/s", "Product/s") and services.

This also applies to all entities that we have acquired or merged, or for those where we have significant control.

Please read our Privacy Policy carefully as it will help you make informed decisions about sharing your personal information with us.

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## Information We Collect

The amount of personal information we collect when using our products and services is limited to what is required and necessary. The personal information that we collect depends on the context of your interaction with us and the Company, the choices you make and the products and services you use.

Personal information is any information that can be used to identify you.

Examples of personal information which we may collect from you include, but are not limited to, your name, postal address, delivery and collection addresses, fax, phone number, ABN and e-mail address. This personal information may also include details of the services which you have purchased from us, such as the date that you purchased the service and the nature of the goods to be delivered. If you provide financial information to us, or establish a credit account with us to pay the fees we charge, we collect some additional necessary information, such as a billing address, a credit card number and credit card expiration date, financial institution account details and tracking information from cheques or money orders.

WiseWay collects personal information to conduct its business, to provide and market its goods and services, for employment of staff (in the pre-employment and employment context) and to meet its legal obligations. This personal information may include: for employment (application and resume details, reference checking details, medical examination results (with the prospective employee's consent), psychological, alcohol, illegal drug testing and criminal record checks), employment application forms, personal details (including details of any personal disability or medication), bank account details and tax file number details, contact details (including emergency and next of kin information details) and superannuation details), for commercial customers and suppliers (personal details, financial details, trade reference and credit checks).

We will never sell or share your data to external parties for marketing or other purposes.

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## **Privacy Policy for Wiseway Website**

As a Visitor, you can freely browse our website to find out more about our Company. You are not required to provide us with any personal information as a Visitor.

We collect your personal information when you register with us ("User", "Client", "Contractor"), when you express an interest in using our products and services, when you participate in activities on our website or otherwise contacting us. Some of the information we collect are your name, email address and preferred means of communication.

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## **Privacy Policy for Wiseway Clients**

If you are a client or a third-party vendor/supplier, potential or otherwise, we may collect and hold financial information about your organisation and your credit history, business credentials and banking information. We may, with your consent, seek trade references and undertake credit checks with external parties. We will use this information to help us establish a strong business relationship with you and/or to determine payment terms and appropriate commercial arrangements or any matter related to this.

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## **Automatically Collected Information**

When you use our Website, we automatically collect certain computer information by the interaction of your mobile phone or web browser with our Website. Such information is typically considered non-personal information. We also collect the following:

### **a. Cookies**

Our Website uses "Cookies" to identify the areas of our Website that you have visited. A Cookie is a small piece of data stored on your computer or mobile device by your web browser. We use Cookies to personalize the Content that you see on our Website. Most web browsers can be set to disable the use of Cookies. However, if you disable Cookies, you may not be able to access functionality on our Website correctly or at all. We never place Personally Identifiable Information in Cookies.

### **b. Strictly Necessary Cookies**

These cookies are essential to enable you to move around the website and use its features. Without these cookies, we cannot provide some of the basic functionalities of our website.

### **c. Performance Cookies**

These cookies collect information about how visitors use our website, for instance which pages visitors go to most often, and the pages that they don't. This helps us to understand and improve the site, so it is easy to use and includes helpful content. They also allow us to fix bugs or glitches on the website. These cookies don't collect information that identifies visitors, so we can't identify you individually. We use analytics tools to track usage of our websites and interaction with our newsletters. For example, to see what content you click on, so we can analyse what content is of most interest to our audience.

### **d. Functionality Cookies**

These cookies allow our website to remember the choices you make as you browse the site. They provide more enhanced and personal features. The information collected is

anonymised and they cannot track your browsing activity on other sites once you leave our site.

**e. Third Party Tracking Tools**

We also use third party tracking tools to improve the performance and features of our Website. These third-party tracking tools are designed to collect only non-personal information about your use of our Website. However, you understand that such tools are created and managed by parties outside our control. As such, we are not responsible for what information is captured by such third parties or how such third parties use and protect that information

**f. Log Information**

We automatically receive information from your web browser or mobile device. This information includes the name of the website from which you entered our Website, if any, as well as the name of the website to which you're headed when you leave our website. This information also includes the IP address of your computer/proxy server that you use to access the Internet, your Internet Website provider name, web browser type, type of mobile device, and computer operating system. We use all this information to analyse trends among our Users to help improve our Website.

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**Your Possible Actions on Automatically Collected Information**

You can turn cookies off at any time, by going into your browser settings, however this may have a detrimental effect on your user experience. If you are happy to continue letting us use cookies in the ways set out in this Notice, to help us guide our work, then you need not do anything.

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**How We Collect Your Personal Information**

Generally, we may collect personal information directly from you when you:

- register to use any of our services;
- use any of our services;
- from publicly available sources of information;
- information directly collected or received from an external agency where it is deemed necessary and considered normal business practice, so that we can continue to provide you with our services;
- third parties such as from referees (in the case of prospective employees) and credit reporting agencies (in the case of customers and prospective customers);
- from our own records of how you use our services;
- contact our support team; and
- visit our sites.

We usually collect personal information directly from the individual when that individual registers or updates information on our systems. We may collect personal information from the individual or the individual's employer.

Collection of information may also include collecting personal information via scanners, card readers, terminals, turnstiles, access control devices, and other means.

Personal information may be held in our general business management and record keeping systems (including email accounts and servers).

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## **Why We Use Your Personal Information**

We collect personal information for a range of legitimate purposes.

Wiseway uses your personal information to provide you with any services which you may request, or to respond to any query or complaint that you may have. We may also use your personal information to:

- verify your identity;
- provide the services you require for which you specifically provided the personal information (for example, to respond to a specific inquiry or to charge your credit card for a purchased service) or for related purposes that would reasonably be expected;
- administer and manage those services, including charging and billing you for those services (including any duties and taxes);
- inform you of ways that the services provided to you could be improved;
- conduct appropriate checks for fraud;
- research and develop our services
- gain an understanding of your needs in order for us to provide you with a better service; and
- maintain and develop our business systems and infrastructure, including testing and upgrading of these systems.

Wiseway may combine any information which it collects from you with information collected by its related companies.

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## **Consequences If You Withhold Personal Information**

You can always choose not to provide your personal information to Wiseway or to limit the personal information you provide to us. However, if you do not provide all the information we require, this may impact the level of service we can provide to you.

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## **Access to Personal Information and Updating Information**

It is important that the personal information we hold about you is correct and up to date. We encourage you to contact us at any time to update or correct information we hold about you.

You can request access to your personal information by sending a request to Wiseway's Privacy Officer in writing or by email. The contact details for the Privacy Officer appear later in this Policy. We will normally provide you with access to this information, provided that the request falls within the requirements of the relevant privacy legislation, your request is reasonable and appropriate notice has been provided to us. We may require you to pay any archiving or retrieval costs associated with this prior to providing that information to you.

We will not disclose commercially sensitive information to you.

We will respond by email or letter to you in relation to your request for information within a reasonable period (usually within 30 days) and if reasonable, will provide access in the manner you have requested, or in an alternative manner, provided it is practicable for us to do so. If it is not reasonable or practicable to do so, we will let you know.

If we refuse to provide access to information or to update information, we will provide you with the reasons.

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## **Sharing, Disclosure and Transfer of Your Personal Information to Service Providers Located Overseas**

If you choose to use our products and services, we may share your personal information to our employees based in other countries.

We will take reasonable steps to ensure that Wiseway employees and third-party suppliers, wherever they are located, abide by our Privacy and other Policies, and that we do not breach your privacy. Data is securely stored, access is limited and given on a need-to-know basis, and use is for legitimate purposes only. We will not use or disclose personal information other than for the purpose for which it was collected or for a purpose reasonably related to it, except when required by law to do so unless we have your consent to do so.

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## **Retention of Your Personal Information**

We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

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## **Information Security and Technical and Organisational Measures**

WiseWay takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure to protect and secure the personal data that we process. We have robust information security procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction.

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## **Compliance to Other Privacy Legislations Best Practices**

We are committed to comply with the privacy legislations and global privacy best practices where Wiseway operates or have data subjects.

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## **Information Regarding Data Protection Rights Under General Data Protection Regulation (GDPR)**

For the purpose of this Privacy Policy, we are a Data Controller of your personal information. If you are from the European Economic Area (EEA), our legal basis for collecting and using your personal information, as described in this Privacy Policy, depends on the information we collect and the specific context in which we collect it. We may process your personal information because:

- we need to perform a contract with you
- you have given us permission to do so
- the processing is in our legitimate interests and it's not overridden by your rights
- to comply with the law

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. In certain circumstances, you have the following data protection rights:

- the right to access, update or to delete the personal information we have on you
- the right of rectification
- the right to object
- the right of restriction
- the right to data portability
- the right to withdraw consent

Please note that we may ask you to verify your identity before responding to such requests. You have the right to complain to a Data Protection Authority about our collection and use of your personal information. For more information, please contact your local data protection authority in the European Economic Area (EEA).

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### **Information Regarding Data Protection Rights Under Other Privacy Legislations**

Your rights as data subjects are similar to what is required by the General Data Protection Regulation. We are committed to uphold your privacy rights as imposed by the applicable privacy law as well as what are considered as best and right practices.

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### **Employee Privacy Roles**

Wiseway has appointed a Privacy Officer (DPO).

Wiseway understands that continuous employee awareness and understanding is vital to the continued compliance of the different privacy legislations and have involved our employees in our preparation plans.

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### **Erasure of Information and Consequences**

You may request for your data to be deleted. We will maintain certain basic biographical details which includes, amongst others, your name, address, employer and date of birth and any other information that we will reasonably need to identify you in the future. In addition, we will maintain a record of our dealings with you, including the request to delete your data. After personal data is deleted from our production servers, it may still reside in our offline backups for at least 36 months or such longer period as our clients may require. However, if a backup is restored all efforts will be made to ensure the data is deleted again.

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### **Links to Third-Party Websites**

Our Website may contain links to other websites that are not under our direct control. These websites may have their own policies regarding privacy. We have no control of or responsibility for linked websites and provide these links solely for the convenience and information of our visitors. You access such linked Websites at your own risk. These websites are not subject to this Privacy Policy. You should check the privacy policies, if any, of those individual websites to see how the operators of those third-party websites will utilize your personal information. In addition, these websites may contain a link to Websites of our affiliates. The websites of our



affiliates are not subject to this Privacy Policy, and you should check their individual privacy policies to see how the operators of such websites will utilize your personal information.

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## **Our Email Policy**

Our affiliates and we fully comply with national laws regarding spam. You can always opt out of receipt of further email correspondence from us and/or our affiliates. We agree that we will not sell, rent, or trade your email address to any unaffiliated third-party without your permission.

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## **Call Recording**

You authorise Wiseway to record your telephone calls for quality, training and audit purposes. If you do not wish to have your call recorded, please let the Wiseway representative know at the beginning of your call. All call data is managed in accordance with this policy.

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## **Updates to Our Privacy Policy**

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this policy, we may notify you on our Website, by a blog post, by email, or by any method we determine. The method we chose is at our sole discretion. We will also change the "Last Updated" date at the beginning of this Privacy Policy. Any changes we make to our Privacy Policy are effective as of this Last Updated date and replace any prior Privacy Policies.

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## **Consequences of Non-Compliance to the Privacy Policy**

Non-compliance to this policy will be dealt with by Wiseway management in an objective and fair manner. We will ensure that privacy rights of the data subjects are not violated. This applies not only to employees but to third parties as well.

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## **Review of Policy**

We last reviewed and updated our Privacy Policy on 16 May 2022. This policy is approved by the Board of Directors on 16 May 2022. Effective date is on 16 May 2022.

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## **Contact Us**

If you have any questions or concerns about our Privacy Practices or this Policy, or any alleged breach of privacy by Wiseway, please contact us.

The Privacy Officer  
Wiseway Group Ltd  
39 – 43 Warren Avenue  
Bankstown  
NSW 2200 Australia  
Email: [compliance@Wiseway.com.au](mailto:compliance@Wiseway.com.au)

Individuals enquiring about their rights and remedies for breaches of privacy, can access detailed information at the Office of the Australian Information Commissioner [www.privacy.gov.au](http://www.privacy.gov.au) or the Privacy Commissioner [www.privacy.org.nz](http://www.privacy.org.nz).