

INTRODUCTION

This privacy policy ("Privacy Policy") sets out how Community Corporate ACN 612 189 545 ("we", "our", "us") collects, stores, uses, protects, shares and discloses your personal information. It applies to our website accessible at communitycorporate.com.au and its related services, products, websites, tools and applications ("Website").

Community Corporate owns the brands Community Corporate and DiversityWorks. For purposes of Privacy Policy references to "the Website" shall include reference to such services, products, websites, tools and applications being offered by the brands owned by Community Corporate.

By visiting or using the Website you agree to the collection, storage, usage and disclosure of your personal information by us in the manner described in this Privacy Policy.

Capitalised words in this Privacy Policy have the same meaning as in the Terms and Conditions available on the Website.

TYPES OF PERSONAL INFORMATION WE COLLECT

As part of delivering our Services we may collect personal information about you as defined under the *Privacy Act 1998* ("Privacy Act"). We will only collect personal information where it is reasonably necessary for the performance of our functions or activities. The personal information we collect may include the following:

- **Registration information:** this includes information that we collect when you register to use our Website or otherwise register for our Services. The information we collect includes your ID, name, gender, date of birth, next of kin, demographic information (see below sensitive information), emergency contact details, mailing or street address, email address, telephone number and other contact details and any other information you directly give us at the registration stage.
- **User information:** this includes information that you have provided to us when using the Website and information we collect from form information submissions on the Website or otherwise collected by us during the provision of the Services. The information we collect includes application forms and supporting documentation, government related identifiers, such as Tax File Numbers, passport and visa details, centrelink payment information, working with children clearances, forms of identification, information received as part of the job listing process if you apply for a position through our Services and any other additional information you provide to us directly or indirectly through your use of the Website. We use such information to assist in providing the Services to you and will not use this information for any other purpose (such as marketing).
- **Profile information:** this includes any information you choose to store on the Website that will assist us in delivering the Services to you and includes information regarding any subscriptions.
- **Financial information:** this includes information such as payment card details and bank account details. We use this information to send to our third party payment gateways.
- **Website use information:** When you use our Website, for example when you contact us we collect information that enables the Website to be able to run.
- **Surveys:** information in connection with client surveys, questionnaires and promotions;
- **Other information we collect related to your use of the Website:** your device identity and type, I.P. address, geo-location information, page view statistics, advertising data and standard web log information and any other information provided by you to us via our Website or our online presence, or otherwise required by us or provided by you.

As part of delivering our Services we may also collect sensitive information as defined under the Privacy Act. The sensitive information we collect may include:

- forms of identification and verification documents (where such identification and forms include sensitive information);
- visas (where such identification includes sensitive information);
- police checks (where such identification and forms include sensitive information);
- working with children clearances (where such identification and forms include sensitive information);
- language or cultural background;
- citizenship status;
- status as an Indigenous Australian;

- disability status; and
- health information.

Sensitive information is subject to a higher level of privacy protection than other personal information and is handled by us in the following ways:

- sensitive information will only be collected with consent, except in specified circumstances under the Privacy Act or it is otherwise required by law;
- sensitive information will not be used or disclosed for a secondary purpose unless the secondary purpose is directly related to the primary purpose of collection and within the reasonable expectations of the individual, or otherwise in specified circumstances under the Privacy Act or it is otherwise required by law;
- sensitive information will not be used for the secondary purpose of direct marketing;
- before we disclose sensitive information overseas, we will take reasonable steps to ensure that recipient does not breach the Australian Privacy Principles in relation to that information; and
- sensitive information will not be shared by related bodies corporate in the same way that we may share other personal information.

HOW WE COLLECT PERSONAL INFORMATION

We may collect personal information either directly from you, or from third parties, including where:

- you register or sign up to the Website (including where you register for free access or any paid subscriptions on the Website);
- you or a third party use the Website to enter in user content;
- you use the Website generally;
- you engage us to provide you with any services;
- you subscribe to any of our newsletters;
- you contact us through our Website;
- you submit any of our online sign up forms;
- you communicate with us via email, telephone, SMS, social applications (such as LinkedIn, Facebook or Twitter) or otherwise;
- you interact with our Website, social applications, services, content and advertising; and
- you invest in our business or enquire as to a potential purchase in our business.

We may also collect your personal information from third parties including government departments and our other service providers and publicly available sources. Where we collect your personal information from a third party, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Social media and cookies

We may also collect personal information from you when you use or access our Services or our social media pages. This may be done through use of web analytics tools, 'cookies' or other similar tracking technologies that allow us to track and analyse your Services usage. Cookies are small files that store information on your computer, mobile phone or other device and enable and allow the creator of the cookie to identify when you visit different websites. If you do not wish information to be stored as a cookie, you can disable cookies in your web browser.

CONSENT

General consent

By registering with us, or creating an Account and agreeing to the Terms and Conditions and/or by using the Website or supplying any documents to us, you consent to us collecting, using and disclosing your personal information for the purposes specified in this Privacy Policy.

Consent for government agencies

In the case of your personal information collected through our Services, by submitting your details to us, you irrevocably consent to us collecting, using and disclosing your personal information to Government Agencies as specified in this Privacy Policy. Such Government Agencies may provide funding to us for such de-identified personal information.

Consent for employers

In the case of your personal information collected through our Services, by submitting your details to us, you irrevocably consent to us collecting, using and disclosing your personal information to employers as specified in this Privacy Policy. We use this information to submit to employers to assist us in providing our Services to you.

USE OF YOUR PERSONAL INFORMATION

We collect and use personal information for the following purposes:

- to operate the Website and provide Services or information to you including to:
 - administer and manage processes which are key to the operations of Community Corporate including recruitment, training and assessments;
 - apply for government employment assistance on your behalf;
 - provide information in relation to Community Corporate's programs and facilities to participants or prospective participants;
 - facilitate the provision of our Services to you;
 - facilitate your registration with any Services (including any newsletters);
 - facilitate your job search (for example providing you with employment opportunities);
 - communicate with you in respect of your registration or employment, as well as other programs, events, and services offered by Community Corporate that may be of interest to you;
 - assist in the collection of fees, charges and general financial management of Community Corporate;
 - collate the information necessary for Community Corporate to review its existing programs, courses, facilities and resources that it provides to staff and clients;
 - any other act to otherwise enable you to use the Website;
 - assist in streaming and personalising information for you;
 - enable us to process your personal data;
 - enable us to receive payment;
 - prevent and detect fraud and/or money laundering;
 - enable us to provide your personal data to others whom you consent or where permitted under the Privacy Act (as detailed below);
 - to manage our relationship with you, including information about similar products or terms and conditions or send you an email reminder that a task you have performed on our Website remains uncompleted such as an incomplete form;
 - enable you to communicate with us regarding your use of the Website;
 - confirm your identity;
 - confirm your eligibility for service offerings;
 - to provide information about you to our contractors, employees, consultants, agents or other third parties for the purpose of providing the Services to you;
 - communicate with you about your Account, or any transaction;
- (where it is de-identified) for the purposes of :
 - generating statistical data;
 - improving the Website and our Services;
 - advertising our Website and Services;
 - petitioning or communicating with a Government agency;
- for record keeping and administrative purposes;
- to improve and optimise our service offering and customer experience and market research;
- to comply with our legal obligations, resolve disputes or enforce our agreements with third parties;
- to administer and protect our Services;

- to enable you to take part in a competition;
- to send you marketing and promotional messages and other information that may be of interest to you and for the purpose of direct marketing (in accordance with the *Spam Act 2003* (Cth)). In this regard, we may use email, SMS, social media or mail to send you direct marketing communications. You can opt out of receiving marketing materials from us by using the opt-out facility provided (e.g. an unsubscribe link);
- to send you administrative messages, reminders, notices, updates, security alerts, and other information requested by you; and
- to consider an application of employment from you.

We will not sell, rent, lease or give away your information to any third party in ways different from what is disclosed in this Privacy Policy.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We may disclose your personal information to our employees and volunteers, service providers who assist us to provide the Services to you such as information technology service providers, contractors and other third parties located inside or outside of Australia. If we disclose personal information outside of Australia, we will take reasonable steps to ensure that any overseas recipient deals with such personal information in adherence with the Australian Privacy Principles.

We may also disclose your personal information to third parties to whom you expressly ask us to send the personal information to or to third parties where permitted under the Privacy Act or to third parties you otherwise consent to us disclosing to. This also includes:

- (a) your authorised representatives;
- (b) to employers where required for the provision of our Services;
- (c) to government bodies where required to apply for government employment assistance on your behalf as authorised under the Terms and Conditions;
- (d) government and regulatory authorities and other similar organisations, as required or authorised by law; and
- (e) such entities that we propose to merge with or be acquired by.

We may also de-identify, aggregate and/or make anonymous your personal information including sensitive information and make it publicly available and share it with any third party for the purposes of:

- advocating to any Government agency and giving advice;
- generating statistical data for the conducting of research; and
- improving the Website and our Services.

STORAGE & SECURITY

We use third-party cloud providers that provide hosting, data storage and other services.

We take reasonable steps to ensure your personal information is secure and protected from misuse or unauthorised access. Our information technology systems use a range of administrative and technical measure to protect these systems.

Community Corporate has in place computer software and hardware that provides electronic protection of and/or prevents access to personal information from unauthorised persons, particularly from those individuals who are external to Community Corporate. Electronic protection will include:

- mandatory password protection on computers; and
- firewall and antivirus software.

The Website has in place the use of an SSL certificate.

Community Corporate also has in place documented record management procedures in relation to the collection, physical security and storage of hard copy records.

Community Corporate has in place systems to manage all personal information so that it is able to destroy or permanently de-identify personal information, wherever reasonable and practicable, that is no longer needed for any reason.

However, we cannot guarantee the security of your personal information.

We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

LINKS

Our Services may contain links to other tools and websites. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of those linked websites and tools and we suggest you review the privacy policies of those websites and tools before using them.

REQUESTING ACCESS OR CORRECTING YOUR PERSONAL INFORMATION

Subject to the Privacy Act, you have a right to access and correct any personal information about you that we may hold. If you wish to request access to the personal information we hold about you, please contact us using the contact details set out below including your name and contact details. We may need to verify your identity before providing you with your personal information. In some cases, we may be unable to provide you with access to all your personal information and where this occurs, we will explain why. We will deal with all requests for access to personal information within a reasonable timeframe.

If you think that any personal information we hold about you is inaccurate, please contact us using the contact details set out below and we will take reasonable steps to ensure that it is corrected.

If we receive a request from you to access or correct personal information we will respond to you within a reasonable time after receiving your request and in the manner requested by you, if it is reasonable and practicable for us to do so. We may charge a reasonable fee for giving access to the information.

IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the Website to you, either to the same standard or at all;
- we may not be able to provide you with information about the Website that you may want; or
- we may be unable to tailor the content of our Website to your preferences and your experience of our Services may not be as enjoyable or useful.

NOTIFIABLE DATA BREACH

In the event that there is a data breach and we are required to comply with the notification of eligible data breaches provisions in Part IIIC of the Privacy Act or any other subsequent sections or legislation which supersede this Part IIIC, we will follow our relevant notifiable data breach procedures in compliance with the Privacy Act and relevant laws.

UPDATES

This Privacy Policy is subject to occasional revision and we reserve the right, at our sole discretion, to modify or replace any part of this Privacy Policy. It is your responsibility to check this Privacy Policy periodically for changes. Continued use of our Website or Services shall indicate your acknowledgement of that it is your responsibility to review the Privacy Policy periodically and become aware of any modifications. We may amend this Privacy Policy from time to time. Not all changes to our Privacy Policy will require your consent, for example where office security procedures are changed. We will notify you of any change to our information handling policy that requires your consent before being implemented.

ENQUIRIES, REQUESTS & COMPLAINTS

Enquiries regarding this Privacy Policy or the personal information we may hold on you, should be addressed with the Privacy Officer, whose contact details are below.

If you think your personal information, held by us, may have been compromised in any way or you have any other Privacy related complaints or issues, you should also raise the matter with the Privacy Officer.

We will ensure your claims are investigated and a formal response will be provided to you, within a reasonable time, considering the circumstances of your claims. If any corrective action is determined to be required, as a result of that investigation, we will take all reasonable steps to rectify the situation and advise you of such, again within a reasonable time considering the circumstances.

If we do not resolve your enquiry, concern or complaint to your satisfaction or you require further information in relation to any privacy matters, please contact the Office of the Australian Information Commission, whose contact details are below.

Office of the Australian information Commission

Telephone 1300 363 992

Email enquiries@oaic.gov.au
Office Address Level 3, 175 Pitt Street, Sydney NSW 2000
Postal Address GPO Box 5218, Sydney NSW 2001
Website www.oaic.gov.au

Contacting us

Entity Community Corporate ACN 612 189 545
Telephone 0481 387 743
Email admin@communitycorporate.com.au
Office Address Privacy Officer, PO Box 1514, Mylor SA 5153
Postal Address Privacy Officer, PO Box 1514, Mylor SA 5153