

## **MAKESURE PRIVACY POLICY**

Makesure Consulting Pty Ltd (ABN 35 168 163 666) (“**Makesure**” “**we**,” “**us**”) is bound by the *Privacy Act 1988* (Cth) and the *Privacy Act 2020* (NZ) (“**Privacy Laws**”) and takes its privacy obligations very seriously. We comply with the Australian Privacy Principles, the Australian Notifiable Data Breaches scheme and the Information Privacy Principles (NZ). This policy sets out how we manage your personal information and applies to all individuals who have dealings with us, either through our websites, our software or otherwise.

This privacy policy applies to all the businesses operated and services offered by Makesure.

Generally, personal information and personal data is information about an identified individual (or an individual who is reasonably identifiable).

### **1. The kind of personal information we collect and hold**

We collect personal information where it is reasonably necessary for our functions or activities, such as delivering software and services provided on our websites.

We collect and hold the following personal information:

- name and contact details;
- details relating to current and past work history;
- academic details;
- names and contact details of referees;
- credit card or other payment details;
- passport number, license numbers and other identification documentation;
- information from enquiries you have made;
- communications between us;
- gender information; and
- results of the following tests:
  - police check (in Australia and internationally);
  - publicly available credit check (bankruptcy/debt);
  - identification (politically exposed persons);
  - right to work (in Australia and New Zealand);
  - operator high risk licences check;
  - driver’s license validation demerit point or full history check;
  - working with children check;
  - medical check;
  - online and verbal reference check;
  - online assessments;
  - personality or cognitive assessments;
  - social media check;
  - employment confirmations;
  - exit interviews; and
  - Information matching requests.

### **2. How we collect your personal information**

We collect personal information about you in a variety of ways and depending on which service of Makesure is accessed, including:

- when you interact with us electronically, via the phone or in person;
- when a third-party organisation provides personal information to us, with your consent, for information matching purposes;
- when you access our website, register as a user or interact with our software;

- when we provide services to you;
- when your prospective or current employer or contracting party gives us your details so that we may provide our services;
- when we conduct checks listed above;
- when we search public registers; and
- through “cookies” that collect information about your use of our website.

### **3. Why do we collect this information? When will your personal information be used and disclosed?**

We use your personal information to provide our services to you and others and to grant you access to our software.

We may disclose your personal information to:

- your prospective or current employer or other third party that has requested or required you to complete or obtain an induction program, course, training program, qualification, licence, document, policy, security check, medical check or other check or program;
- to public registers, government agencies or referees for the purposes of conducting background, police or reference checks; and
- to our business partners, contractors, suppliers and vendors who assist us in the provision of services to you or on your behalf. This disclosure is solely for the purpose of allowing and assisting us to provide the services to you.

We may use your personal information in connection with:

- any , program, course, induction or training program, licence, document, policy, test, assessment, check or history request by or of you with your consent or that you might be required to undergo;
- verification of identity documentation;
- the investigation, resolution and defense of complaints and legal claims;
- compliance with court orders and other legal obligations and regulatory requirements; and
- any insurance claim or proposal that requires disclosure of your personal information.

We may also use your information to tell you about products and services we think you might be interested in. To do this, we may contact you by email, phone, SMS, social media, mail or advertising. On any such communications you are always given the option to unsubscribe or ‘opt-out’ of receiving such further communications. If you choose this option, your information will not be used to send you our marketing materials, offers or information of a similar nature again.

### **4. How long will we hold your information>**

We take reasonable steps to hold your information for only as long as we need it, which may be influenced by the following factors:

- fulfilling our legal or regulatory obligations;
- internal research and analytics;
- responding to a question or complaint; or
- being unable to delete the data for technical reasons.

### **5. Access to and correction of your personal information**

You may ask to access the personal information we hold about you and we will respond to

your request as soon as reasonably practicable and in any event within 20 working days.

We will give you access to that person information unless we are entitled to refuse under the relevant Privacy Laws, in which case we will provide you with a written notice setting out, among other things, the reasons for the refusal.

You may ask us to amend the information if it is not accurate, complete or up to date and we will respond to your request within the time frames stated above. If we refuse to amend the information:

- we will provide you with a written notice setting out, among other things, the reasons for that refusal; and
- you may ask us to attach a note to the information indicating what you think is inaccurate, incomplete, or out of date or misleading and we will respond to that request as soon as reasonably practical.

If you wish to exercise your rights of access and correction, please contact us using the details provided below. In some cases, we may impose a moderate and reasonable charge for providing access to personal information. We will not charge you simply because you lodge a request for access.

## **6. How will we keep your information safe?**

Your information will be stored on a secure database which has restricted access to only those personnel that need to have access to this information. Access to our computer environment is through a secure login environment and all efforts have been made to ensure that it cannot be accessed by unauthorised personnel.

At any time at your request, we will destroy your personal information. We will do this for any lawful request, provided it is in writing. In some of our applications, you are able to delete your own personal information. Otherwise, we will delete personal information as required by the relevant Privacy Laws.

Forms submitted to carry out checks are audited by some of our suppliers and these will be conducted in line with the policies of those suppliers (e.g. Australian Criminal Intelligence Commission). Any payment details such as credit card details will be destroyed securely upon a successful transaction.

## **7. Sensitive Information**

We only collect sensitive information about you where that information is reasonably necessary for us to carry on our functions or activities and you have consented or where we are required or permitted by law to do so.

Sensitive information includes personal information about an individual's racial or ethnic origin, political opinions, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices and criminal record and also health and genetic information about an individual.

We only collect the following types of sensitive information with your written consent:

- health and medical information; and
- criminal record.

## **8. Overseas recipients**

We may disclose your information to overseas recipients for specific purposes, for example, to conduct international police history checks or when our services are located overseas. In such situations, it is not practicable for us to list the countries in which those recipients are based.

The developers (Next Logic) who service our websites and may have access to personal information are based in Romania. Next Logic is certified to ISO27000 in relation to information security standards and we have taken reasonable steps to ensure that Next Logic does not breach the Privacy Laws.

Otherwise, we are not likely to disclose your personal information to overseas recipients.

## **9. Cookies**

Our websites use cookies (small text files that are placed on your computer or mobile device when you visit our website).

Cookies collect information about users and their visit to the website, such as their Internet protocol (IP) address, how they arrived at the website (for example, through a search engine or a link from another website) and how they navigate within the website. A cookie cannot read data from your hard disk or read cookie files created by other websites.

We use cookies that track the way visitors use our websites. These cookies help us understand which parts of our website are most interactive and used by our visitors. These cookies are anonymised and do not report any information that is of a personal identification nature. Essentially, the result data gives us an aggregated view of overall behaviour of all visitors of our websites but does not tell us what a single user does.

Additionally we use temporary cookies that exist whilst you are logged into our websites. These cookies are used by our applications and software to create a secure user session when you login to our websites using your username and password – this allows you to navigate around secure areas of our websites without the need to reenter information.

You can delete cookies from your hard drive. However this may hinder your access to valuable areas of information within our websites.

## **10. Contacting Us and Making a Complaint**

Naturally, it is in our interest to protect your privacy. If at any time you have any questions regarding this privacy policy or our management of your personal information, you can contact us in Australia on 1300 245 235 and in New Zealand on 0800 033 333. Alternatively, you can email us at [privacy@makesure.com.au](mailto:privacy@makesure.com.au).

If you have any complaints about our privacy practices or a breach of the Privacy Laws please feel free to send in details of your complaint.

We take complaints very seriously and make all reasonable efforts to manage and respond to any complaints within 30 days of receiving written notice of your complaint. In managing and responding to your complaint, we keep a record of your complaint.

If the matter is not resolved to your satisfaction you may then refer your complaint to the appropriate government office as set out below:

Australia: Office of the Australian Information Commissioner who can be contacted through their website at [www.oaic.gov.au](http://www.oaic.gov.au)

New Zealand: Office of the Privacy Commissioner (NZ) who can be contacted through their website at [www.privacy.org.nz](http://www.privacy.org.nz)

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