

## 2.0 Privacy

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### 2.1 Policy

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| Policy statement                   | <p>Protective Group is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information. We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information. A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <a href="http://www.aaic.gov.au">www.aaic.gov.au</a></p>   |
| Scope                              | <p>Applies to all external parties with which there is a relationship and/ services provided by Protective Group and its companies. Protective Group uses information collected from clients and their referring service to conduct assessments, compile reports, further liaise with the referral service, contractors or with any other professional services as authorised by the individual.</p>   |
| Guiding principles and definitions | <p><b>What is Personal Information and why do we collect it?</b></p> <p>Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, home addresses, email addresses, phone numbers and information about client circumstances. This Personal Information is obtained in many ways including through referral forms, discussion in person (eg. face to face assessments), email correspondence, text messaging, phone conversations, via websites (ours, yours and other organisations), from media and publications, from other publicly available sources and from third parties. We collect your Personal Information for the primary purpose of providing our services to you and/ your organisation. When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.</p> <p>Personal, sensitive and identifying information that is collected will not be shared without your written or verbal consent unless there is a circumstance such as an unlawful activity or serious threats to health and safety that requires us to share or disclose your information.</p> <p><b>Sensitive Information</b></p> <p>Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.</p> <p>Sensitive information will be used by us only:</p> <ul style="list-style-type: none"> <li>• For the primary purpose for which it was obtained</li> <li>• For a secondary purpose that is directly related to the primary purpose</li> <li>• With your consent; or where required or authorised by law.</li> </ul> <p><b>Third Parties</b></p> <p>Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.</p> <p><b>Disclosure of Personal Information</b></p> <p>Your Personal Information may be disclosed in a number of circumstances including the following:</p> <ul style="list-style-type: none"> <li>• Third parties where you consent to the use or disclosure; and</li> </ul> |

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- Where required or authorised by law.

**Security of Personal Information**

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure. All hard copy documents will be kept in a locked filing cabinet and digital documents will be stored on either encrypted hard drives or on an encrypted password protected server. When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

**Access to your Personal Information**

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing. Protective Group will not charge any fee for your access request. In order to protect your Personal Information we may require identification from you before releasing the requested information.

**Maintaining the Quality of your Personal Information**

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

**Policy Updates**

This Policy may change from time to time and is available by emailing [info@protectivegroup.com.au](mailto:info@protectivegroup.com.au)

**Privacy Policy Complaints and Enquiries**

If you have any queries or complaints about our Privacy Policy please contact:

**Privacy officer**  
**Protective Group Pty Ltd**  
**25-27 Ballantyne Street,**  
**Southbank Vic 3006**  
**[info@protectivegroup.com.au](mailto:info@protectivegroup.com.au)**  
**(03) 9699 4257**

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| Related documents | 1.1 Compliments and complaints policy<br>1.2 Compliments and complaints procedure<br>1.3 Compliments and complaints form |
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