



PRIVACY

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Overview

At Waco Kwikform Limited (“**Waco**”, the “**Company**”, “**we**”, “**our**”) we understand that you take your privacy seriously and we do too. We respect the privacy of individuals and are committed to protecting the privacy of Personal Information which the organisation collects, holds and administers. **Personal Information** is information which may directly or indirectly identify a person.

Purpose

In most aspects of our business Waco collects, stores, uses, discloses, and otherwise manages Personal Information in carrying out our functions and activities. The Company has a responsibility to ensure that our management of Personal Information complies with the various Privacy Acts in the jurisdictions in which we operate.

The Waco Kwikform Privacy Policy (the “**Policy**”) outlines our framework in dealing with privacy considerations in the management and use of Personal Information about our prospective and current employees.

We have a separate Privacy Statement for dealing with public and client Personal Information. The Privacy Statement is available on our public website.

Application

The Waco Kwikform Privacy Policy shall apply to all the Company operations in Australia and New Zealand, including our subsidiaries.

The Company reserves the right to review, amend or cancel this Policy at our absolute discretion to take into account new laws and technology, changes to the Company’s operations and practices and to make sure it remains appropriate to the changing legal environment. The Company commits to taking all reasonable steps to ensure that all employees, contractors, suppliers and any other third party comply with the Policy.

Policy

Waco collects and administers a range of Personal Information for the purposes of supplying our services to our many clients, operating our business. The Company is committed to protecting the privacy of Personal Information it collects, holds and administers.

We recognise the essential right of individuals to have their Personal Information administered in ways which they would reasonably expect.

Waco Kwikform Ltd is bound by laws which impose specific obligations when it comes to handling Personal Information.

In Australia Waco Kwikform Ltd is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

We are also bound by the Victorian Health Privacy Principles which are contained in the Health Records Act 2001.

In New Zealand we also comply with the Privacy Act 2020.

The Policy has been developed to ensure we understand and comply with these obligations.



Collecting Personal Information

Types of Personal Information collected

The types of Personal Information we collect depends on the nature of our engagement with you.

Examples of Personal Information we may collect include:

- General identification information such as names, job title, occupation, date of birth and gender.
- Contact details such as address, email address, phone and mobile phone number and Internet Protocol (IP) address.
- Usernames and passwords.
- Educational qualifications, employment history, salary and referee reports.
- Payment details including group certificates, payslips, and other income earning information, for example payment summaries, superannuation or KiwiSaver statements, statements from banks and financial institutions showing interest received, employment termination payment summaries, receipts for gifts, donations and work-related expenses.
- Safety information or emergency contact information
- Information contained in identification documents such as passport or driver's licence.
- Government-issued identification numbers such as tax file numbers or IRD numbers.
- Financial information such as credit card and bank account details, shareholdings and details of investments (e.g. if you have shares, units, managed funds or other investments, details of dividend payments and distributions from managed funds, any investment gains or losses from the disposal of shares, units and rental properties, including associated income and expenditure).
- Details of superannuation and insurance arrangements.
- Personal Information that may be captured when using our technology e.g laptops, mobile phone records
- Visa or work permit status and related information.
- Information about immigration status. records of our communications with you, such as telephone, email, SMS, online and in- person communications;
- images of you which may be captured on CCTV in Waco offices, including in Australia and New Zealand.
- other information that you provide us during the course of business; and
- other information that is capable of identifying you.

How we collect Personal Information

At all times we try to only collect the information we need for the particular function or activity we are carrying out.

We collect Personal Information

- (a) when you provide it to us
- (b) when someone else provides it to us on your behalf
- (c) when we collect it in relation to your work.

Personal Information you provide:

The main way we collect Personal Information about you is when you give it to us. For example, when you apply for a job vacancy at Waco, we collect Personal Information such as contact details and your employment history. The employment information we hold may also include our opinion about your suitability for a particular position.



For example, if you apply for or commence work at Waco, you will provide information to us as part of your application or induction. If you work for a company that is a contractor to us, then your employer may provide us with your details.

Generally, we collect your Personal Information from you when we deal with you in person or over the phone, when you send us correspondence (including via email), or when you complete a questionnaire, form or survey.

Personal Information provided by other people:

Sometimes we will collect your Personal Information from outside sources. These can include marketing mailing lists and other public information (including public posts to social networking sites such as LinkedIn and Twitter) and commercially available personal, identity, geographic and demographic information.

Outside sources may also include information gained from a third party. For example, we may collect your Personal Information from previous employers, your referees, your personal representatives, legal firms, a financial advisor and/or banks where you have authorised disclosure to us.

Someone else (such as a recruitment agent or referee) may have provided us with information about you when we were assessing your suitability for work at Waco. A colleague may provide information about you for the purpose of appraising your performance or conducting an internal investigation.

We may also collect Personal Information about you from your use of our websites and social media and information you provide to us through contact mailboxes.

In relation to your work

We may collect information about you and your work during the course of your employment or performance of a contract, such as information when you enter or leave one of our premises, your use of Waco equipment (including computers), and information collected from monitoring your use of our systems, to ensure you comply with our applicable policies.

We may also collect contact details and some other Personal Information if you are on our committees or participating in a meeting or consultation with us.

In relation to employee records:

Under the Australian Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, in Australia this Privacy Policy does not apply to the Company's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Waco and you. However, Waco must provide access and ensure compliance with the Health Privacy Principles under the Victorian Health Records Act 2001.

Sensitive Information

It may be necessary in some circumstances for us to collect some forms of **Sensitive Information** about you. Sensitive Information includes information about a person's race, gender diversity, sexual orientation, disability, ethnic origin, political opinions, health, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

We will only collect and use Sensitive Information with your consent, in accordance with applicable laws or in a de-identified aggregated manner.

You might need to provide Personal Information about other individuals to us (e.g. about your spouse, dependents or other family members). If so, we rely on you to have informed those individuals that you are giving their Personal Information to us and to have advised them about this Privacy Policy and how they can obtain a copy of it.



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It is important to be aware that if you access another party’s website or application via our website, that other party will deal with your Personal Information in accordance with its own Privacy Policy. You will need to review those websites to view a copy of the relevant Privacy Policy.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with us as usually we need to use your Personal Information to provide specific services to you, or which relate to or involve you.

Purposes and Use of Personal Information

How do we use Personal Information?

Waco will use Personal Information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection as would be reasonably expected, or to which you have consented.

We may use video surveillance for security purposes and the footage will be used only by the Company and by the providers of our security services for safety or security reasons. Surveillance videos are not used by the Company for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

The purposes for which the Company may use the Personal Information include:

- to establish, maintain and manage our relationship with you, including functions such as recruitment, payroll, appraisals, and any disciplinary action (including any termination of any employment or engagement) and managing your work and any claim in relation to any injuries, illnesses you have and any workers compensation claims by you;
- to assess or respond to claims, complaints, or conduct, or co-operate with investigations when required;
- to obtain professional services as required including legal, human resources, industrial relations, accounting and insurance services;
- for purposes directly related to all of the above;
- otherwise as permitted or required by law; or
- otherwise with your consent.

Job applicants, staff members and contractors:

In relation to Personal Information of job applicants, employees and contractors, the Company’s primary purpose of collection is to assess and (if successful) to engage the applicant, employee or contractor, as the case may be.

Unsuccessful applications are disposed of in line with Privacy Guidelines and requirements.

Disclosure of Personal Information

Waco may disclose Personal Information, including sensitive information, held about you to:

- government departments;
- people providing services to Waco; and
- anyone you authorise the Waco to disclose information to.

How we share your information

In order to meet the purposes set out above your Personal Information may be shared internally with people who have a legitimate role in the recruitment, management, administration and safety of employees or the compiling of management information. Your information will only be shared when, and to the extent, it is necessary to achieve our purposes. Where we need to share information in a way we have not anticipated here, we will only do so if required or permitted by law.



People who may have access to your Personal Information include:

- human resources, for the purposes of managing the recruitment and employment process
- professional staff, for the purposes of compiling and generating internal and external management information
- your manager and their manager
- contracted service providers which the Company uses to perform services on its behalf (such as recruitment, banking, Return to Work/ Injury Management services, IT service providers), within and outside Australia and New Zealand
- Company owned or related entities;
- Our legal advisers or other professional advisers and consultants engaged by the Company.

We may also need to share your Personal Information with external people or agencies as part of managing your employment. Where possible, we will seek your consent to disclose your Personal Information to third parties. Where this is not possible, we will only disclose your Personal Information if we have a lawful basis to do so, such as:

- your nominated financial institution for payment of your salary
- your superannuation or Kiwisaver scheme
- government agencies, such as the Australian Taxation Office or Inland Revenue Department and the Workplace Safety Regulators or Accident Compensation Corporation
- agencies that provide salary packaging benefits to eligible and participating employees, such as novated leasing
- agencies that provide employee benefits including automated payments for services (e.g. health insurance providers, union fees, professional body membership fees), and
- in the event of an emergency, police, medical or hospital personnel, civil emergency services, your legal representative or nominated emergency contact person, or any other person assessed as necessary to respond to the emergency

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

We do not disclose Personal Information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non-personal, de-identified or aggregated information with select third parties for research, development, analytics or for purposes other than direct marketing.

Sending Personal Information Overseas

Generally, we will not send Personal Information about an individual outside Australia or New Zealand without obtaining your consent or as otherwise complying with the Privacy Principles or other applicable privacy legislation.

In some cases, the organisations that we may disclose your Personal Information to may be based outside the location where the information is collected. For example, we may share your information with our Group Head Office in South Africa.

Where we do this, we require these parties to take appropriate measures to protect that information and to restrict how they can use that information.

Management and Security of Personal Information

Storage and retention

We may use third-party service providers to store your Personal Information and provide us with services. This means that we may transfer Personal Information, or access it from, countries other than Australia or New Zealand.

We recognise that we are accountable for your Personal Information wherever it is in the world. Where we can, we will send Personal Information only to countries that have adequate privacy laws in place (such as New Zealand, Australia or the EU). However, where we cannot do this, we take reasonable steps to ensure that any third-party service providers we use can meet our privacy and security expectations.

We retain your Personal Information only for as long we need it to perform our contractual obligations or meet our legitimate interests, or to comply with our legal obligations, including Taxation, Employment Law or Public Liability legislation.

Personal Information about unsuccessful applicants may be retained for up to 3 months. We also retain Personal Information about temporary staff, contractors and teaching assistants for this purpose.

Security

Wherever your Personal Information is stored, we take reasonable steps to ensure that it is protected against loss or unauthorised access, modification, use or disclosure. For example:

- Company systems are protected by firewalls and modern encryption standards
- Company systems are password protected, and access is monitored and audited
- credit card details for recurring payments or donations in a secure, encrypted format within a PCI compliant system
- All employees are required to adhere to the Company's IT and Security related suite of policies
- Access to the Personal Information we store is limited to those employees who have a legitimate business requirement to use it
- We make privacy and information security training available to employees
- We have a data breach management procedure in place, and
- Information is backed up regularly, and backups are encrypted and held in secure storage facilities

Social media widgets and applications

Some of our websites and services may include functionality to enable information sharing via third party social media applications, such as the Facebook Like button and Twitter widget. These social media applications may collect and use information regarding your use of our websites. Any Personal Information that you provide via such social media applications may be collected and used by members of that social media application separate to us and are subject to the privacy policies of the relevant companies that provide the applications. We do not have control over, or responsibility for, those companies or their use of your information.

Any Personal Information that you provide on any Waco social media feature may be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we may have limited or no control.

Updating Personal Information

Waco endeavours to ensure that the Personal Information it holds is accurate, complete and up-to-date. A person may seek to update their Personal Information held by the Company by contacting the Privacy Officer (Human Resources) of Waco at any time.

Legislation requires the Company not to store Personal Information longer than necessary. In particular, in Australia, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what Personal Information the Company holds about you.

Under the relevant Privacy Act and the Health Records Act, an individual has the right to obtain access to any Personal Information which the Company holds about them and to advise Waco of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information we hold about you, please contact the Privacy Officer (Human Resources) in writing.

Waco may require you to verify your identity and specify what information you require.

Enquiries and Privacy Complaints

If you would like further information about the way the Company manages the Personal Information it holds, please contact the Privacy Officer (Human Resources). If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Privacy Officer who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you to discuss further.

If you are not satisfied with our response to your complaint then you can refer your complaint to:

Australia: the Office of the Australian Information Commissioner (OAIC) using the contact details at the OAIC's website <https://www.oaic.gov.au/>

New Zealand: Office of the Privacy Commissioner using the contact details <https://www.privacy.org.nz>

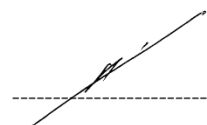
Related Documents

- Code of Conduct Policy
- Workplace Behaviour and Conduct Policy

Further Information

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.aaic.gov.au

A copy of the New Zealand Privacy Principles may be obtained from the website of The Office of the Privacy Commissioner at www.privacy.org.nz



Mike Els
CEO
Waco Kwikform Group

Policy Authorisation

Effective Date	Review Date	Accountable Department	Accountable Officer
01 July 2021	30 June 2024	Human Resources	HR Director

