

OPS01

Privacy Policy

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Introduction

Purpose

The purpose of this policy is to outline how Recycal handles any customer, client or employee information gathered in its operations.

Scope

This policy applies to all Recycal employees.

Responsibilities

- All employees must act in accordance with this policy.
- Recycal must collect and handle personal information and health information in accordance with the Privacy Act 1988 (Commonwealth), Privacy and Data Protection Act 2014 (Vic) and the Health Records Act 2001 (Vic) unless otherwise required by law.



General Statement of Policy

Employees

Recycal is committed to responsibly managing the information provided to Recycal by individuals, employees and organisations in accordance with the Privacy Act 1988, Australian Privacy Principles (APPs), and relevant legislation and standards.

Sensitive personal information such as details about a person's race, ethnicity, political opinions, membership of political associations, membership of professional associations and trade unions, religious or philosophical beliefs, sexual preferences, health and genetic information or criminal records, may be disclosed in the course of business dealings.

Employees of Recycal, and those providing products or services on behalf of the Company (e.g. contractors or suppliers) have a responsibility to ensure that this information is appropriately managed.

Maintaining Privacy and Confidentiality

Recycal acknowledges and respects the privacy of individuals and organisations in accordance with the privacy standards set out in the Australian Privacy Principles (APPs) and relevant legislation. A summary is as follows:

- Personal or organisational information will only be collected with prior knowledge and consent.
- Personal or organisational information provided to Recycal will only be used for the purposes for which it was collected, and this information shall not be used for any other purpose without consent.
- Personal or organisational information provided to Recycal shall not be disclosed to a third party or other institutions or authorities without consent, except if required by law or other regulation.

- Personal or organisational information provided shall be kept until it is no longer required, at which time Recycal may decide to destroy the information by shredding or disposal by document security (except where archiving is required).
- The information held on a client or organisation will be up-to-date, relevant, non-obtrusive and objective.
- Recycal will take reasonable steps to correct inaccurate, incomplete or out-of-date information on a regular basis.
- Recycal has processes in place to securely protect the information under its control from unauthorised access, improper use and alteration.

Collection of Personal Information

The personal information collected depends on the nature of the individual's relationship with Recycal and the nature of any support services provided.

Recycal may collect personal information in person, through its website, over the telephone, through written and electronic correspondence through hard copy forms (such as feedback forms) and, in limited cases, from third parties.



General Statement of Policy

Client information

Recycal uses client's personal information to ascertain their needs and ensure that the correct provision of support services is available to the client. Recycal does not disclose client personal information to any third parties.

The information that Recycal holds on our clients constitutes health information and is handled in accordance with the Health Records Act 2001. Information collected will be held for a period of seven years from the last time the person to whom the information relates was provided a service. If the health record is that of someone under the age of eighteen, that information will be held until that person turns twenty-five years of age.

Employee's Personal Information

Personal information is filed on your individual personnel records file and is securely stored. A copy of your emergency contact details will be provided to the Chief Executive Officer (CEO) to be used in case of an emergency.

Access to personal information is restricted to the CEO and General Manager.

Individual employees may apply to the CEO and/or the General Manager to access personal information. The CEO and/or General Manager must be satisfied that the individual request for this information is genuine and/or if the person has provided permission for the employee to access their information (particularly for health and safety personal information).

Individual employees of Recycal accept responsibility to notify management of any changes to their personal information.

Managers will not disclose reference information about a Recycal employee (or former employee) to a third party until they are satisfied that consent has been given by the employee (or former employee). The consent may be either verbal or written in the form of a request, a consent form, directive or letter.

Note: Providing information that relates directly to the employment relationship between an employer and employee is not a breach of federal privacy laws. This type of information can include things such as the employee's skills, performance, conduct, and their terms of employment.

Quality and Correction of Personal Information

Recycal takes reasonable steps to ensure that:

- the personal information collected is accurate, up-to date and complete
- when using and disclosing the information, the information is relevant for the purposes of the use or disclosure.

Recycal will not charge for making a request for access or correcting of personal information. If an individual believes that the personal information that Recycal holds about the individual is inaccurate, incomplete, out-of-date, irrelevant or misleading, the individual may contact Recycal to have the information amended.

Where Recycal is satisfied that the information should be corrected, Recycal will take reasonable steps to correct that information. If Recycal does not agree that the individual's information needs correcting, Recycal will provide written notice of the decision, including the reasons and our complaint process if the individual is not satisfied with the decision.

Privacy and the Internet

Protecting information provided via the Internet

Recycal's website uses security encrypted response forms when personal and financial details are requested. These forms are subject to compliance requirements with Payment Card Industry Data Security Standards (PCI-DSS) as well as the privacy principles.

Implementation

Breach of this Policy

Failure to comply with the principles of this policy, or of the supporting procedures and forms, could result in appropriate disciplinary actions, suspension, termination of employment (dismissal) or termination of vendor contracts and agreements. Additionally, individuals may be subject to loss of Company access, privileges, civil, and/or criminal prosecution.

Policy Review

This policy will be reviewed annually or as required to reflect changes in business practice or legislation.

Dissemination of Policy

A copy of this policy will be made available to each worker upon commencement of work and additional copies made available upon request.

Authority and Responsibility

This policy is issued under the authority of the Chief Executive Officer of Recycal.

Legislation

- a) Privacy Act 1988 (Commonwealth)
- b) Privacy and Data Protection Act 2014 (Vic)
- c) Health Records Act 2001 (Vic)



Doug Rowe
Chief Executive Officer
Date: 21st July 2023



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