

Privacy Policy

1 Introduction

- 1.1 From time to time Ionize Pty Ltd ("**the Company**") will collect, hold, use and/or disclose personal information relating to individuals (including, but not limited to its customers, contractors, suppliers, and employees) in the performance of its business activities.
- 1.2 The information collected by the Company will, from time to time, be accessible to certain individuals employed or engaged by the Company (our "staff") who may be required to use the information in the course of their duties.
- 1.3 This document sets out the Company's policy in relation to the protection of personal information, as defined, under the *Privacy Act 1998* (Cth) the ("**Act**"), which includes the Australian Privacy Principles ("**APP**"). The APPs regulate the handling of personal information.
- 1.4 The obligations imposed on the Company under this policy are also imposed on our staff, whether employed or engaged by the Company.
- 1.5 This policy outlines the Company's requirements and expectations in relation to the handling of personal information.

2 Scope

2.1 This policy applies to all staff, including our employees, independent contractors, consultants and other workers engaged by the Company and who have access to personal information that is reasonably required in the course of performing their duties.

3 What is personal information?

3.1 Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in material form or not.

4 What information is not covered by this policy?

- 4.1 This policy, and the Act, does not apply to the collection, holding, use or disclosure of personal information that relates to a current or former employment relationship between an individual and the Company (i.e. an 'employee record' about that individual).
- 4.2 Staff and former staff requesting access to employee records held in personnel files should direct their request, in writing, to the Vice President Corporate at info@ionize.com.au

5 Kinds of information the Company collects and holds

- 5.1 The type of information that the Company routinely collects and holds depends on an individual's relationship with the Company, for example:
 - i. **Candidate**: if a person is a candidate seeking employment with the Company, the Company may collect and hold information about that candidate including the candidate's name, address, email address, contact telephone number, gender, age, employment history, references (including the referee's contact details), and resume
 - ii. **Customer**: if a person is a customer of the Company, the Company may collect and hold information including the customer's name, address, email address and contact telephone number
 - iii. **Supplier**: if a person or business is a supplier of the Company, the Company may collect and hold information about the supplier including the supplier's name, address, email address, contact telephone number, business records, billing information and information about goods and services supplied by the supplier
 - iv. Sensitive information: the Company will only collect sensitive information where an individual consents to our collection of the information, and the information is reasonably necessary for one or more of the Company's functions or activities, such as providing a service you have requested from us
 - v. **Anonymity:** When you engage with us to purchase a service from us, we may only do so when your personal details are disclosed to us. We are not able to offer services to you where you choose to remain anonymous.

6 How the Company collects and holds personal information

- 6.1 The Company (and staff acting on the Company's behalf) will only collect personal information by lawful and fair means.
- 6.2 The Company may collect personal information in several ways, including without limitation:
 - i. through application forms (e.g. job applications)
 - ii. by email or other written mechanisms
 - iii. over a telephone call
 - iv. in person
 - v. through transactions required in the course of service delivery
 - vi. through the Company website
 - vii. through lawful security cameras installed at our premises

- viii. by technology that is used to support communications between individuals and the Company
- ix. through publicly available information sources (which may include telephone directories, the internet and social media sites).

7 Use and Disclosure of Personal Information

- 7.1 The main purposes for which the Company may use and disclose personal information may include but are not limited to:
 - i. recruitment functions
 - ii. providing services and associated customer support
 - iii. conducting training and events such as conferences
 - iv. obtain and track customer feedback and satisfaction
 - v. business relationship management
 - vi. marketing our products and services to you, if you have agreed to receive marketing communications from us.
- 7.2 The Company may also collect, hold, use and/or disclose personal information for other purposes if an individual consents or if required or authorised under law.

8 Disclosure of Personal Information

- 8.1 The Company may disclose personal information for any of the purposes for which it is was collected, as indicated under clause 7 of this policy, or where it is under a legal duty to do so.
- 8.2 Disclosure will usually be to related entities or to third parties such as contracted service suppliers in connection with the provision of our services.

9 Access to and correction of personal information

- 9.1 If the Company holds personal information about an individual, they may request access to and correction of that information. Requests for access and correction should be made in writing, to the Vice President Corporate at info@ionize.com.au The Company will respond to any request within a reasonable period, and a charge may apply for giving access to the personal information where the Company incurs any unreasonable costs in providing the personal information.
- 9.2 There are certain circumstances in which the Company may refuse to grant an individual access to personal information. In such situations the Company will provide the individual with a written notice of refusal that sets out:
 - i. the reasons for refusing to provide access; and
 - ii. the mechanisms available to the individual to make a complaint.

10 Integrity and security of personal information

10.1 We will take steps to ensure that the limited personal information we collect, use and disclose is accurate, up-to-date and complete.

10.2 We ensure through training and documented procedures that staff take reasonable steps to protect personal information from misuse, interference, loss and from unauthorised access, modification or disclosure. Data is held securely in our systems and can only be accessed by authorised staff for specific work purposes. Data that is no longer required for business purposes is securely deleted or destroyed.

11 Questions and Complaints

- 11.1 Please direct any questions or complaints about the Company's personal information management practices, in writing, to the Vice President Corporate at info@ionize.com.au We will acknowledge receipt of your question or complaint and endeavor to provide a response within 30 days. Complaints will be dealt with in accordance with the Company's complaints procedure and the Company will provide a response within a reasonable period.
- 11.2 Individuals who are dissatisfied with the Company's response to a complaint, may refer The complaint to the Office of the Australian Information Commissioner (**OAIC**). Information about how to make a complaint to OAIC is available on the OAIC website [https://www.oaic.gov.au/privacy/privacy-complaints].