



Document Number GE-GEN-0013	Revision 1.0	Prepared By E. Santos	Released By N. Hodges
Title Privacy Statement			Page 1 of 7

Revision	Date	Change
A	26 Feb 2014	Draft issue for internal review & comment.
1.0	3 March 2014	Formal issue

## 1 Purpose and Scope

The purpose of this document is to document UVS Pty Ltd Privacy Statement.

## 2 Reference Documents

	Document Number	Revision	Title
A	Not used		

## 3 Privacy

### 3.1 Privacy statement

UVS takes privacy seriously and is covered by 13 Australian Privacy Principles (APPs) as set out in the Privacy Amendment (Enhancing Privacy Protections) Act 2012, which amends the Privacy Act 1988. From 14 March 2014, the APPs replace the National Privacy Principles (NPPs) and Information Privacy Principles (IPPs).

To comply with our obligations under the APPs UVS have a Privacy Policy, which sets out how we manage privacy in our organisation.

### 3.2 UVS privacy compliance officer

The UVS Pty Ltd Privacy Compliance Officer is the Chief Executive Officer. The Chief Executive Officer will be the first point of contact for all privacy issues, including handling access requests and complaints should they arise.

### 3.3 Privacy and confidentiality

As responsible corporate citizens we appreciate the importance of confidentiality. This part of the obligation remains unchanged by this privacy policy. The privacy policy deals with our customers and our employee's additional right to privacy and is independent of our contractual and ethical obligations.

### 3.4 Purpose of the policy

UVS Pty Ltd wishes to implement obligations under the Privacy Act and would like to take all reasonable steps in order to comply with the Act and protect the privacy of the personal information that we hold. This policy sets out how we intend to do so.

### 3.5 Personal information

UVS Pty Ltd collects the following personal information:

#### 3.5.1 Company Employees



Document Number GE-GEN-0013	Revision 1.0	Prepared By E. Santos	Released By N. Hodges
Title Privacy Statement			Page 2 of 7

- o Your name
- o Date of birth
- o Address
- o Next of Kin
- o Contact Information (phone, e-mail)
- o Occupation
- o Career history and career plans
- o Results of aptitude and other tests
- o Tax file numbers
- o Superannuation details
- o Banking details
- o Performance reviews
- o Resumes
- o References
- o Training and qualification details

### 3.5.2 Customers

- o Company Trading Name
- o Company address and contact information
- o Trading record
- o Trading references
- o Details of Directors
- o Sales trading history
- o Purchasing history from UVS
- o Meeting records between UVS and client
- o Phone call and e-mail records between UVS and client.

### 3.6 Collection of information

UVS collects personal information in order to provide commercial services to our customers, and to maintain legitimate employee and client records. The majority of personal information collected by UVS is securely stored in our CRM and ERP systems, with some information stored on our Cloud based server.

We do not as a rule collect sensitive information, (as defined in the Privacy Act), however should we do so, we will explain the reasons for so doing and collect it only with the employee's consent or the consent of our customer.

### 3.7 Access to your personal information

UVS Pty Ltd provides access to the personal information that we hold about employees and customers. Access will be provided in accordance with our Access Policy. If you require access to your personal information please contact the UVS Privacy Compliance Officer.

### 3.8 Complaints

If you have any complaints about our privacy practices or wish to make a complaint about how your personal information is managed, please contact the UVS Privacy Compliance Officer. Complaints will be handled under the UVS Pty Ltd Policy.

### 3.9 Storage, review and disposal

We take all reasonable steps to protect the security of the personal information that we hold. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.



Document Number GE-GEN-0013	Revision 1.0	Prepared By E. Santos	Released By N. Hodges
Title Privacy Statement			Page 3 of 7

Personal information that UVS collect, use, or disclose on an employee will be reviewed during the employee's review to ensure the information is accurate, up-to-date, relevant, and complete. Any changes or corrections required to the information held may be made at that time, or at a time when identified or requested.

Any information held by the company that is no longer needed for any authorised purpose will be reasonably destroyed or de-identified, subject to the exceptions defined in APP 11. This includes any information, such as interview notes, held by the company on candidates making application for employment with the company.

### **3.10 Contract**

If UVS Pty Ltd does contract out these services we will take measures to protect the information by including contractual provisions in any agreements. (Refer to the UVS standard contractor clauses with respect to privacy).

### **3.11 What happens if you choose not to provide the Information**

You are not obliged to give us your personal information. However, if you choose not to provide UVS Pty Ltd with personal details, we may not be able to provide employees or customers with our full range of support and services.

### **3.12 Disclosure of personal Information**

The information collected by UVS is strictly confidential. UVS Consulting will not reveal, disclose, sell, distribute, rent, licence, share, or pass that information on to third parties other than those contractors which may from time to time be required to provide services to the company, and which are contractually bound to impose similar restrictions to the UVS Privacy Policy.

However we may disclose personal information, other information, or data we collect from you for the purpose specified to you at the time of collection or for other purposes if:

You would reasonably expect us to disclose such information for that purpose

That purpose is related to the purpose specified to you at the time of collection

### **3.13 Sources of information**

Where possible UVS will solicit and collect information directly from UVS customers, or directly from UVS employees.

If personal information about an individual was not solicited by UVS, or not collected from the individual but from another party, UVS will advise that individual of the collection and provide the other party with the UVS Privacy Policy. Unsolicited personal information will only be retained if reasonably necessary and with consent from the individual, and will be given the same privacy protection as solicited personal information, as defined in the APP 4.

### **3.14 Web site use of cookies**

A cookie is a small message given to your web browser by our web server. The browser stores the message in a text file, and the message is then sent back to the server each time the browser requests a page from the server.

We make limited use of cookies on our website. We use cookies to improve the functionality of our website, not to store any of your personal information. We only use cookies during the e-ordering



Document Number GE-GEN-0013	Revision 1.0	Prepared By E. Santos	Released By N. Hodges
Title Privacy Statement			Page 4 of 7

process. The cookies are used to keep track of the details of your order. When the order is sent, the cookie or cookies used will be deleted.

Most Internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to notify you each time a cookie is sent to your computer, giving you the choice whether to accept it or not.

### **3.15 Security**

UVS uses a variety of physical and electronic security measures including restricting physical access to our offices, firewalls and secure databases to keep personal information secure from misuse, loss or unauthorised use or disclosure, and interference. The Internet is not a secure environment. If you use the Internet to send UVS any information, including your email address, it is sent at your own risk.

## **4 Access and correction Policy**

This policy is directed to those individuals whose personal information is held by UVS Pty Ltd.

### **4.1 Purpose**

The purpose of this Policy is to set out how UVS Pty Ltd will provide access to and correction of your personal information. The Policy is part of our Privacy Policy and our desire to provide for, maintain and give effect to your right to privacy.

### **4.2 Overriding principles**

At all times the conduct under this Policy will be governed by the following principles:

- All requests for access or correction will be treated seriously
- All requests will be dealt with promptly
- All requests will be dealt with in a confidential manner

Your request to access or correct your personal information will not affect your existing obligations or effect the commercial arrangements between you and UVS Pty Ltd.

### **4.3 Form of access**

Employee private information will be stored and accessible to you, via our online HR system (NAV Express).

For any other information, you can make a request to access the information in writing by contacting the UVS Privacy Compliance Officer.

### **4.4 When will access or correction be denied?**

Where possible, UVS will favor providing access in the manner requested by the individual if reasonable to do so. Where there is a refusal or dispute about the right or forms of access or correction, the company will provide the individual with written reasons and these will be dealt with in accordance with the UVS Grievance Procedure.

Access will be denied if:

- the request does not relate to the personal information of the person making the request;



Document Number GE-GEN-0013	Revision 1.0	Prepared By E. Santos	Released By N. Hodges
Title Privacy Statement			Page 5 of 7

- o providing access would pose a serious and imminent threat to life or health of a person;
- o providing access would create an unreasonable impact on the privacy of others;
- o the request is frivolous and vexatious;
- o the request relates to existing or anticipated legal proceedings;
- o providing access would prejudice negotiations with the individual making the request;
- o access would be unlawful;
- o denial of access is authorized or required by law;
- o access would prejudice law enforcement activities;
- o access discloses a 'commercially sensitive' decision making process or information; or
- o Any other reason that is provided for in the Australian Privacy Principles (APPs) set-out under the Privacy Act.

#### 4.5 Time

We will take all reasonable steps to provide access **within 30 days** of your request. In cases where the request is not complicated or does not require access to a large volume of information, we will provide information **within 14 days**.

#### 4.6 Costs and charges

UVS Pty Ltd will impose the following charges:

- o Photocopying
- o Delivery cost of information stored off-site - where information is stored off-site, the cost of obtaining access to the information
- o Access to electronic databases
- o Any other fees as may be applicable at the time of request

UVS will make these fees and charges known to the individual prior to processing their request. Costs and charges will not apply to the making of the request, for correcting the personal information, or for associating the statement with the personal information.

## 5 Privacy Complaints

### 5.1 Introduction

UVS Pty Ltd sees the privacy to the organisation, its customers and other stakeholders. As such UVS Pty Ltd is committed to protecting the privacy of the personal information that we hold. This is part of our organisations:

- o Legal obligations under the Privacy Act 1988
- o Ethical and business obligations
- o Service to you

UVS Pty Ltd places high priority on effectively dealing with any complaints about privacy that you may have.

### 5.2 Overriding principles

UVS Pty Ltd is committed to handling complaints quickly and fairly. At all times the conduct under this policy will be governed by the following principles:

- o All complaints will be treated seriously
- o All complaints will be dealt with promptly



Document Number GE-GEN-0013	Revision 1.0	Prepared By E. Santos	Released By N. Hodges
Title Privacy Statement			Page 6 of 7

- o All complaints will be dealt with in a confidential manner

The privacy complaint will not affect your existing obligations or the commercial arrangements that exist between this organization and you

### 5.3 Who may complain under this policy?

If you have provided us with personal information, you have a right to make a complaint, have it investigated and dealt with under this policy.

### 5.4 What is a privacy complaint?

A privacy complaint relates to any concern or dispute that you have with our privacy practices as it relates to **your** personal information. This could include matters such as:

- o How personal information is collected
- o How personal information is stored
- o How this information is used or disclosed
- o How access is provided

### 5.5 What do I do if I have a complaint about privacy practices?

UVS Pty Ltd resolves grievances at the local level if possible. If you have a complaint about privacy please contact the UVS Privacy Compliance Officer, or advise your usual recognized UVS contact. Your UVS contact will on-forward your complaint to the UVS Privacy Compliance Officer.

You may complain orally or in writing. The UVS Privacy Compliance Officer will have the authority to resolve your complaint.

### 5.6 Anonymity and pseudonymity

UVS will do its best to deal with anonymous or pseudonym complaints from clients or employees, although we may not be able to investigate fully and follow-up such complaints. However, in the event that an anonymous or pseudonym complaint is received UVS will note the issues raised and try and resolve them appropriately.

### 5.7 Grievance procedure

The goal of this policy is to achieve an effective resolution of your complaint within a reasonable set timeframe of approximately 28 days or as soon as practicable.

Once the complaint has been made, and the matter is in the hands of the UVS Privacy Compliance Officer, the matter can be resolved in a number of ways:

#### 5.7.1 Request further information and investigation

The UVS Privacy Compliance Officer may request further information from you. You should be prepared to give as many details as possible including details of any relevant dates and documentation. This will enable UVS to investigate the complaint and determine an appropriate and useful solution. All details provided will be kept confidential.

The complaint may be investigated. The organisation will try to do so as soon as possible. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.



Document Number	Revision	Prepared By	Released By
GE-GEN-0013	1.0	E. Santos	N. Hodges
Title			Page
Privacy Statement			7 of 7

#### 5.7.2 Discuss options

We will discuss options for resolution and if you have suggestions about how the matter might be resolved you should discuss these with the UVS Privacy Compliance Officer. The UVS Privacy Compliance Officer could also suggest other solutions or give examples of how the personal information can be revised or stored in a different way.

#### 5.7.3 Refer to Managing Director Operations

If your complaint is not resolved at the local level, it will be referred to the Managing Director. The Managing Director would be provided with the history and may discuss the complaint with the employees, or other parties that are involved.

#### 5.7.4 Resolution

You will be informed of the outcome and the reasons for the decision. If this does not resolve the complaint, the matter will be referred to a mutually agreed intermediary.

If after the above steps have been followed you are still dissatisfied with the outcome you may refer the complaint to the Federal Office of the Privacy Commissioner.

### 5.8 Information

For any further information about this policy please contact the UVS Privacy Compliance Officer.