

1. Introduction

Multi Services Solutions Group Pty Ltd A.C.N. 602 887 025 and its subsidiaries (MSS) collect and handles personal information in accordance with the Privacy Act 1988 (Cth) and Privacy Act 1993 (NZ) (Privacy Act), including the Australian Privacy Principles (APPs).

Personal information includes information relating to you. References in this Privacy Policy to "you" are references to the individual reading this Privacy Policy or an individual in respect of whom MSS has collected information through any of its products or services. References to the terms "Australian Privacy Principles", "personal information" and "sensitive information" have the meaning attributed to those terms in the Privacy Act.

Please review this website regularly as this Privacy Policy may change from time to time. A copy of MSS's Privacy Policy is available on its website at mssgroup.com.au/privacypolicy or alternatively, to request a copy to be sent by email free of charge, please email helpdesk@mssgroup.com.au

If you are an employee, please refer to the section headed 'Employee Information' below.

Collection of Information

The types of information MSS collects will depend on the nature of your dealings with MSS.

MSS will generally collect personal information about you when you:

- instruct MSS to provide you with a product or service;
- visit our website;
- provide personal information via a web form;
- subscribe to a newsletter or to receive MSS publications;
- apply for employment with MSS:
- make a payment to MSS; and
- engage in business dealings with MSS.

If you are a client of MSS, the personal information that will ordinarily be collected may include your name, business or residential address, email address and contact numbers.

You have the option of not providing personal information that MSS requests. However, if you decide not to provide the requested information, MSS may not be able to provide you with certain services.

3. Collection of Non-Personal Information via the Website

MSS also collects information that does not, on its own, identify an individual (**non-personal information**). When you visit our website, a record of your visit may be made with the following information:

- your top level domain name;
- the date and time of your visit;
- the web pages you accessed:
- the documents you downloaded;
- the type of browser you are using;

- your server address; and
- IP address,
- on a general and aggregate basis, in order to analyse the performance of the site.

This aggregated, non-personal information is collated in order to determine the amount of people who visit our website and the most frequently visited sections of the website. This enables MSS to continually update and refine its site. If you use any of our online forms or send an email to someone at MSS, a record will also be made of your email address.

When MSS combines non-personal information with personal information, MSS treats the combined information as personal information.

MSS's websites may contain links to other sites. MSS is not responsible for the privacy practices or policies of those sites.

Cookies

Our website, online services, apps and email messages may use cookies. Cookies help us to better understand user behaviour and tell us which parts of the website people have visited. MSS uses cookies to improve the navigational experience of visitors on its website by making it more user-friendly.

If you wish to disable cookies, your browser should allow you to opt out of receiving cookies. If you are not sure whether your browser has this capability, check with your service provider to find out how to disable cookies. Please note that certain features of our websites may not be available once cookies are disabled.

5. Website analytics

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. MSS uses reports provided by Google Analytics to help understand website traffic and webpage usage.

By using this website, you consent to the processing of data about you by Google in the manner described in <u>Google's Privacy Policy</u> and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the <u>opt-out service provided</u> by Google.

Our website also uses interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or "share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other personal information.

6. Collection of information in the ordinary course of business

MSS may collect personal information about you in the ordinary course of its business, including your name, address, email address, contact details and occupation. This information may be collected through meetings, face to face interviews, business cards, seminars, telephone calls and from third parties in accordance with the Privacy Act.

7. Monitoring of telephone calls

When MSS speaks to you on the phone, calls may be recorded for security, training and quality assurance purposes.

8. Sensitive Information

MSS will only collect sensitive information about you (e.g. information about your membership of a professional body, race, religion, ethnicity, political opinion or individual health information) with your consent and if that collection is reasonably necessary for one or more of its functions or activities.

9. Use of Personal Information

MSS may use personal information it collects about you for a number of purposes including to:

- compile statistical data and to maintain its database;
- develop/improve its website;
- respond to any email inquiries;
- provide you with publications:
- manage quality control;
- manage systems administration;
- comply with compliance policies;
- and provide you with a product or service.

MSS will not use or disclose your personal information for any purpose which is not related (or in the case of sensitive information, directly related) to the above purposes without your consent, or unless otherwise authorised, required or permitted under Australian law or regulation.

MSS will not use or disclose personal information it holds for direct marketing purposes unless you consent to its use for this purpose. If you no longer wish to receive information about MSS's services, or other marketing communications, please send an email to MSS at helpdesk@mssgroup.com.au advising that you do not wish to receive such information.

10 Disclosure of Personal Information

MSS may disclose your personal information in the following ways:

- on a confidential basis to external service providers that provide services such as financial or administrative services in connection with the operation of its business;
- to any person (where necessary) in connection with its services, such as to regulatory authorities, partners or advisors; or
- to related entities of MSS overseas, but in all such cases in accordance with the AAPs.
- Examples of services provided by external service providers include mailing houses, payment processors, and archiving services.

If MSS engages external service providers, it will take reasonable steps to ensure those entities comply with their obligations under the APPs when they handle your personal information. MSS will also ensure external service providers are only authorised to use personal information for the limited purposes specified in MSS's agreement with them.

MSS will also take reasonable steps to ensure that any overseas related entities or service providers comply with the applicable sections of the APPs in relation to how your personal information is held, managed and accessed.

11. Employee Information

MSS may collect the following personal information about individuals employed (**Employee**) by MSS:

- name and address:
- date of birth;
- immigration status details;
- tax file number;
- bank details.
- superannuation details,
- background check
- qualifications and certifications
- terms and conditions of employment including employee benefits; and
- information relating to employment (ie absentee records, development records, annual and personal/carer's leave entitlement, disciplinary and grievance matters.

This information may include sensitive information (including information relating to an employee's health or ethnic origin.

An Employee's personal information will only be used for purposes related to their employment, or as otherwise authorised, required or permitted under Australian law, or for another purpose to which the employee consents.

MSS will not disclose any Employee's personal information to third parties without consent from the Employee, unless such disclosure is to a government body, regulator, law enforcement agency or other party required, authorised or permitted under Australian law.

Employees may request copies of their personal information, request amendments to their information and make a complaint in accordance with this Privacy Policy.

12. Access and amendment requests

If you wish to obtain access to any personal information that MSS has collected about you, please make a request in writing to MSS (details below). A reasonable fee may apply for the provision of this information (ordinarily, an electronic print out or photocopy). Identification will be requested for security purposes.

MSS will take reasonable steps to make sure that any personal information it collects, uses or discloses is accurate, complete and up-to-date. If you believe that any information held by MSS is inaccurate, incomplete, out of date, irrelevant or misleading, please contact MSS (details below).

Request for access and/or amendments will be responded to within a reasonable period of time in accordance with the APPs. MSS may refuse a request for access or amendment to personal information in the circumstances outlined in the APPs. If access is refused, MSS will provide you with a written reason for the refusal.

13. Complaints

If you have any complaints about MSS's dealings with your personal information, including any breaches by MSS of the APPs, please email MSS (details below) with:

- (a) details of your complaint including relevant dates and names of third parties (if any); and
- (b) provide any relevant documents or correspondence.

MSS will acknowledge receipt of your complaint within two days and investigate the issue. MSS will advise you in writing of the outcome of the investigation within a reasonable period of time in accordance with the APPs. If you are not satisfied with the outcome, MSS will advise you of further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner (see http://www.oaic.gov.au/ for further information).

14. Storage and security of Personal Information

MSS takes all reasonable steps to ensure that personal information is kept secure and protected against unauthorised access, modification or disclosure and from misuse, interference and loss.

Any information which MSS holds is stored on secure servers in Australia and New Zealand, that are protected in controlled facilities. Only certain authorised employees of MSS and/or contractors who provide services in relation to its information systems will have access to the secure servers.

Although MSS have put in place certain checks and measures in relation to system security, MSS cannot guarantee that data transmitted over the internet will be 100% secure. MSS will not be responsible for the security of information you send to, or receive from MSS, over the internet.

In the event of a data breach, MSS is committed to complying with the requirements of all Australian Privacy Laws and where required, the provisions of the General Data Protection Regulation.

15. Data Retention

MSS retains information you provide to it and information which it collects about you, including personal information, for as long as MSS continues to provide services to you and specifically until such time as you request MSS to delete your personal information. MSS will retain all information relating to services provided to clients for a minimum of seven years after the date that a client ceases to use its services.

16. How to contact MSS

If you have any questions about this Privacy Policy or MSS's privacy practices, please contact MSS (details below).

MSS Risk Officer: Ph: 1300 677 287

E: helpdesk@mssgroup.com.au

Alternatively, you can write to us at:

MSS Risk Officer Multi Services Solutions Group Pty Ltd Unit 8, 1B Kleins Road, Northmead, NSW 2152

17, References

All document referenced documents are available on the MSS Document Library, alternatively click the quick links below.

• MSSG-HRT-G-Employee Handbook

18. Document Control

This document was prepared by Katrina Southon.

Document No.	Document Name	Version	Revision date	Section revised & change reference
MSSG-COM-G	Privacy Policy	01	28.02.2020	Kardos Scanlan
		02	05.10.2020	KS Review
		03	07.10.2020	ÈM & IP Review