

PRIVACY POLICY

Purpose

“We”, “us” and “our” means Mapien Pty Ltd (ACN 062 670 053) ATF The Trustee for Mapien Unit Trust (ABN 43 486 407 141) of Level 10 340 Adelaide St Brisbane City QLD 4000.

We are bound by the Privacy Act 1988 (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**).

This policy explains how and why we collect, use, hold and disclose your personal information and sensitive information through our operations as a consulting firm.

By providing personal information to us, you consent to us collecting, holding, using and disclosing your personal information in accordance with this policy and any other arrangements that apply between us.

What is personal information?

Personal information is information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion.

Information or opinion may be personal information regardless of whether it is true and whether it is recorded in a material form or not.

Sensitive information means:

- information or an opinion about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices or criminal information that is also personal information; or
- health information about an individual; or
- genetic information about an individual that is not otherwise health information; or
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- biometric templates

What personal information do we collect and hold?

We collect information about you and your interactions with us including but not limited to the following:

- name, mailing or street address, email address, telephone number and other contact details;
- company name;
- nature of business;
- financial information;
- business relationship history;
- age or date of birth;
- details of the products and services we have provided to you, or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;



- any other personal information that you provide to us or that may be required to facilitate your dealings with us;
- where relevant and generally with your consent, sensitive information including but not limited to:
 - information required for participation in psychometric testing related to ability, aptitude and personality;
 - information about your health, any disabilities and special dietary needs including where you register or attend an event or seminar, or in connection with your employment;
 - information collected as part of our recruitment process;
 - information required for participation in coaching and/or training programs; or
 - information required for immigration services.

We may collect information about how you access, use and interact with the website. This information may include, without limitation:

- the location from which you have come to the site and the pages you have visited; and
- technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language or operating system.

We do this by using a range of tools such as Google Analytics, Google Ads and DoubleClick.

Cookies

We use cookies on the website.

A cookie is a small text file that the website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website.

You may refuse to use cookies by selecting appropriate settings on your browser, if your browser allows this. However please note if you do this, you may not be able to use the full functionality of the website.

Why do we collect, hold and use your personal information?

We may collect, hold and use your personal information to:

- provide our content, products and services to you;
- optimise our website, business and users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- manage our relationship with you;
- contact you;
- comply with our legal obligations and assist government and law enforcement agencies or regulators;
- identify and tell you about other products or services that we think may be of interest to you;
- perform psychometric testing and reporting;
- deliver coaching and training programs; or



- perform visa applications or other immigration related matters.

How do we collect your personal information?

We may collect information either directly from you or from third parties.

We will collect your personal information directly from you whenever you interact with us.

We may collect information from third parties, including but not limited to:

- referees;
- external marketing providers;
- existing or prospective clients; or
- publicly available sources.

How do we store and hold personal information?

Information is primarily stored on both secure databases operated either by us or our external service providers. Some information about you may be recorded in paper files that we store securely.

- We implement and maintain processes and security measures to protect information we hold from misuse, interference or loss and from unauthorised access, modification or disclosure. These processes and systems include the use of identity and access management technologies to control access to systems on which information is processed and stored.
- Personal information is only accessible to authorised employees with a genuine need to access the information as part of their employment. Mapien makes every effort to utilise applications where the data warehouse is located within Australia and has Single-Sign-On and Multi-factor Authentication.

We will also take reasonable steps to destroy or deidentify information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the APPs. However, most of the personal information will be is or will be stored in client files which will be kept by us for a minimum of 7 years.

Who do we disclose personal information to and why?

We may disclose your personal information or to external service providers so that they may perform services on our behalf.

We may also disclose your personal information to others where:

- we are required or authorised by law to do so;
- you have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

Overseas recipients

We may disclose your personal information to recipients which are located outside Australia. Those recipients are likely to be located in the United States of America or Europe.

Do we use your information for marketing?

We will use your personal information to offer you products and services we believe may interest you but will not do so if you tell us not to.



When you receive electronic marketing communications from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication.

Access to and correction of your information

You may access or request correction of the personal information that we hold about you by contacting us. Our contact details are set out below. There are some circumstances in which we are not required to give you access to your personal information.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps.

Prospective employees or contractors

When you express interest in or apply for a position with us, we may collect certain information from you (including your name, contact details, working history and any relevant records checks) from any recruitment consultant, your previous employers and any others who might be able to provide information to us to assist in our decision whether or not to make you an offer of employment or engage you under a contract.

We may use your personal information, or sensitive information in the instances you have completed psychometric testing as part of your application, to consider your application.

Exclusions

This policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

Complaints

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us. Our contact details are set out below.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (OAIC) (www.oaic.gov.au) for guidance on alternative courses of action which may be available.

Contact details

If you have any questions, comments, requests or concerns, please contact Celia Young, Head of People and Performance at cyoung@mapien.com.au.

Changes to this policy

We may change the policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure you are aware of our current policy.

You can obtain a copy of our current policy from our website or by contacting us at the contact details above.