Procedure No. 4.1, Rev 2 Page 1 of 5

## PRIVACY POLICY

TAPS, a trading name for Trainee & Apprentice Placement Service Inc. (ABN 42 6161 617 967) (we, us, our) is bound by the Australian Privacy Principles under the Privacy Act 1988 (Privacy Act).

This Privacy Policy outlines how we deal with your personal information, as well as our legal obligations and rights as to that information. If we agree with you to use or disclose any of your personal information in ways which differ to those stated in this Privacy Policy, the provisions of that agreement will prevail to the extent of any difference.

## 1. Key types of information

Certain words have special meanings when used in this Privacy Policy. These are shown below.

**Personal information** means information or an opinion about you to the extent that you are identified by, or can reasonably be identified from, the information.

**Credit eligibility information** means information that has been obtained from a credit reporting body, or that has been derived from that information, and is about your credit worthiness.

**Credit information** means personal information that, in general, relates to your credit history (refer to section 13. Glossary - for a more detailed explanation of this term).

**Credit-related information** means credit information, credit eligibility information and related information.

#### 2. How will TAPS collect, use and disclose my personal information?

#### (a) Collection

Wherever possible, we will collect personal information directly from you. This information will generally come from what you provide to us for one of our services and supporting documentation.

We only ask for personal information relevant to our business relationship with you. When you apply for or request our services, we may request:

- identifying information, like your name, address and other contact details, gender and your date of birth;
- information about your financial position;
- your employment details;
- your tax file number;

We may also collect personal information (including credit-related information) about you from third parties, such as any referees that you provide, other credit providers and third party service providers including credit reporting bodies. Credit reporting bodies collect credit information about individuals which they provide as credit reports to credit providers and others in the credit industry to assist them in managing credit risk, collecting debts and other activities. You can also ask a credit reporting body, through contact details on their website, not to use or disclose your personal information if you believe on reasonable grounds that you have been or are likely to be a victim of fraud, including identity fraud. Some information is created through our internal processes, like credit eligibility scoring information.

You may decide that you do not wish to provide certain information to us. We will outline the consequences of you not providing such information, although on most occasions it will mean that we will be unable to provide the service you have requested.

Procedure No. 4.1, Rev 2 Page 2 of 5

People or other organisations may share information with us we haven't sought out (referred to as 'unsolicited information'). Where we receive unsolicited personal information about you, we will check whether that information is reasonably necessary for our function or activities. If it is, we'll handle this information the same way we do with other information we seek from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

## (b) Use

We may use your personal information for the purpose of providing services to you and managing our business. This may include:

- · assessing and processing your application for the services we offer;
- introducing you to services we facilitate on behalf of third parties;
- to provide you with additional information in relation to existing services you already receive from us;
- · to update contact details on any database held by us, or for providing services to you;
- to update the records of all other accounts you have with us;
- to inform you about services available (refer to section 9. Marketing for further information);
- to allow you to obtain the unique benefits that are available resulting from association with TAPS including newsletters and offers negotiated by us on your behalf;
- to enhance the delivery of services we provide you (including conducting research);
- charging, billing and recovering overdue payments;
- maintaining and developing our business systems.

In general, we do not use or disclose your personal information for a purpose other than:

- a purpose set out in this Privacy Policy;
- a purpose you would reasonably expect;
- a purpose required or permitted by law, or
- a purpose otherwise disclosed to you and to which you have consented.

#### (c) Disclosure

We may disclose your personal information to other organisations including our external service providers and contractors, credit reporting bodies and other financial institutions.

#### 3. Sensitive information

Where it is necessary to do so, we may collect personal information about you that is sensitive. Sensitive information includes information about your health, and membership of a professional or trade association.

Unless we are required or permitted by law to collect that information, we will obtain your express consent (except where your consent can reasonably be implied from the specific nature of our dealings).

## 4. Refusal of credit applications

We may refuse an application for consumer credit made by you individually or with other applicants. Our refusal may be based on credit eligibility information obtained from a credit reporting body about you, another applicant or another person proposed as guarantor. In that case, we will give you written

Procedure No. 4.1, Rev 2 Page 3 of 5

notice that the application has been refused on the basis of that information. We will tell you the name and contact details of the relevant credit reporting body and other relevant information.

#### 5. What if my information is not accurate, up-to-date or complete?

We take reasonable steps to make sure that your personal information that we collect, use or disclose is accurate, complete and up-to-date.

However, if you believe your information is incorrect, incomplete or not current, you can request that we update this information by contacting TAPS on 8433 1200.

#### 6. Keeping your information secure

We store information in different ways, including paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from:

- misuse, interference and loss, and
- unauthorised access, disclosure or modification.

Some of the ways we do this are:

- confidentiality requirements of our employees;
- document storage security policies;
- security measures for access to our systems;
- only giving access to personal information to a person who is verified to be able to receive that information;
- control of access to our buildings; and
- electronic security systems, such as firewalls and data encryption on our websites

We will also only keep your personal information for as long as it is needed (including when we are no longer required by law to keep records relating to you). When your personal information is no longer needed we will take reasonable steps to ensure that it is destroyed or permanently deidentified.

We can store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

#### 7. Can I get access to my personal information held by TAPS?

You may request access to the personal information that we hold about you at any time. If the request for information relates to information that is readily accessible to us we will provide it to you immediately.

For more complex requests a written request will need to be forwarded to us in order for us to process your request. You will need to provide us with sufficient identification before we can allow you access to any personal information.

We will respond to your request for access within a reasonable time. We may recover the reasonable costs of our response to a request for access to personal information

## 8. Can TAPS deny access to information?

Only in limited circumstances can we deny you access to your information. If we refuse to give you access to any of your personal information, we will provide you with reasons for the refusal and the relevant provisions of the Privacy Act that we rely on to refuse access. You can contact us if you would like to challenge our decision to refuse access.

## 9. Marketing

Procedure No. 4.1, Rev 2 Page 4 of 5

We may use your personal information, including your contact details, to provide you with information about products and services, including those of third parties, which we consider may be of interest to you. We are permitted to do this while you are associated with us, and even if you are on the Do Not Call Register.

We may also provide your details to other organisations for specific marketing purposes.

From time to time we may phone or send you direct marketing material. At any time you may advise us that you do not wish to receive marketing communications. We will consider that you consent to this, unless you opt out. You may opt out at any time if you no longer wish to receive marketing information or do not wish to receive marketing information through a particular channel, like email. Please keep in mind that we are required to send some information by law. If you don't want us to send you marketing communications you can register on the TAPS No Contact/No Call Register, by contacting TAPS on 8433 1200.

#### 10. Website

This section explains how we handle personal information and credit information collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact us on 8433 1200 as there are other ways for you to provide us with your personal information.

## (a) Visiting our website

Anytime you access an unsecured part of our website, that is, a public page that does not require you to log on, we will collect information about your visit, such as:

- The time and date of the visit;
- Any information or documentation that you download;
- Your browser type
- Internet protocol details of the device used to access the site.

## (b) Cookies

A "cookie" is a small text file which is placed on your internet browser and which we may access each time you visit our website. When you visit the secured pages of our website (ie pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (ie public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies, however doing so might prevent you from accessing the secured pages of our website.

### (c) Email

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so.

Your email address will only be used or disclosed for the purpose for which is was provided. It will not be added to any mailing lists or used for any other purpose without your consent.

#### (d) Security

We use up-to-date security measures on our website to protect your personal information and your credit information. Any data containing personal, credit or related information which we transmit via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

## (e) Links on our website

Procedure No. 4.1, Rev 2 Page 5 of 5

Our website may contain links to third party websites. The terms of this Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information or credit information, you will need to obtain a copy of their privacy policy.

## 11. Changes to the Privacy Policy

We may make changes to this Privacy Policy from time to time (without notice to you) that are necessary for our business requirements or the law. Our current Privacy Policy is available on our website.

## 12. Privacy questions and complaints

If you have any questions or concerns about your privacy, confidentiality or access information, contact us on 8433 1200, or visit TAPs at 235 Glen Osmond Road Frewville. You can also contact us if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, we will respond to you as soon as possible. We will aim to deal with your complaint at the source of your complaint. If you are not satisfied with the response you receive, please let us know and our Business Operations Department will investigate further and respond to you.

If you are still not satisfied, you can contact external bodies that deal with privacy complaints. These are Financial Ombudsman Service, the Federal Privacy Commissioner or, in the case of insurance-related privacy complaints, the Australian Prudential Regulation Authority. Any of these bodies may forward your complaint to another external dispute resolution body if it considers the complaint would be better handled by that other body.

Financial Ombudsman ServicePost: GPO Box 3, Melbourne VIC 3001 Telephone 1300 367 287 Website www.fos.org.au

Federal Privacy CommissionerPost: GPO Box 5218 Sydney NSW 2001Telephone 1300 363 992 Website www.oaic.gov.au

Australian Prudential Regulation AuthorityPost: GPO Box 9836, Sydney 2001Telephone 1300 558 849 Website www.apra.gov.au

If you would like further information about privacy laws, visit the Office of the Australian Information Commissioner's website: oaic.gov.au

#### 13. Disclaimer

This Privacy Policy is provided for the purposes of information only. While we have taken care to ensure that it is accurate and current, we provide no guarantee as to its accuracy or currency. We accept no liability for loss or damage suffered as a result of reliance on the information provided in this Privacy Policy.