

Privacy Policy

Document information

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1. Background

This document sets out the policy of acQuire Technology Solutions Pty Ltd (ABN 59 009 333 644) – hereafter referred to as acQuire- relating to the protection of the privacy of personal information.

acQuire Technology Solutions is an employee-owned company originating in Perth, Western Australia. Founded in 1996, acQuire develops Geoscientific Information Management (GIM) software solutions for the natural resources industries with a focus on exploration, resource development and mining assets. The company currently employs over 100 staff working in five offices around the globe, with support centres operating in each major time zone.

acQuire is committed to protecting the privacy of the personal information it collects and receives. This Privacy Policy explains how acQuire collects, stores, discloses and otherwise handles personal information. It also describes how you can ask to access and correct the personal information we hold about you or complain about any suspected privacy breach.

A copy of this Privacy Policy is available on the acQuire website. A printed copy can be obtained free of charge by contacting our Privacy Officer (details under heading 11 below).

1.1. What is personal information?

Personal information means “information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is either identified or reasonably identifiable” (Source Privacy Act 1988).

Examples include but are not limited to: an individual's name, address, contact number, email address, pre-employment medical checks and resumes.

1.2. Our obligations

acQuire complies with the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) (Privacy Act) as amended on 12 of March 2014. The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection/receipt to use and disclosure, storage, accessibility and disposal.

We comply with privacy legislation such as:

- applicable Australian State and Territory health privacy legislation when we collect and handle certain health information; and
- the *Spam Act 2003* (Cth) and the *Do Not Call Register Act 2006* (Cth).

1.3. Employee records

The acQuire policy is to protect the personal information of its employees as it does other personal information.

2. The purposes for which we collect, hold, use and disclose personal information

2.1. General

acQure needs personal information to be able to perform its functions, including administration, training, invitations to events, selling and implementing licences, formalizing agreements and contracts, providing services and support, research and development, recruitment, marketing and related activities.

The main purposes for which we collect, hold, use and disclose personal information are to provide products and services to our stakeholders including customers, potential customers, industry associations and technology partners, contractors and sub-contractors, employees, shareholders, potential employees, suppliers, potential suppliers, community partners, government organizations and to maintain and extend our customers and our network.

For those above purposes, our activities include:

Employees Personal Information

- Pre-employment information (e.g. curriculum vitae, reference check, due diligence, general contact details, medical checks);
- Visas administrative assistance – acQure is an accredited sponsor able to nominate an employee under the Standard Business Sponsorship scheme and for that purpose collects and uses individual personal information, deals with the DIAC when possible on behalf of the individual and provides migration outcomes
- Social and Community events organized by acQure with the intent to promote the integration and a good lifestyle;

Training and events

- administering our Training program (including informing about requirements, developing, promoting and conducting Training events for customers keeping records of Training attendance, accreditation);
- developing, promoting and conducting other events (whether digitally, online, face-to-face or otherwise), including seminars and conferences (including organising speakers, locations and catering, making travel arrangements where required and keeping attendance records);
- marketing materials to potential customers as well as existing customers

Surveys, research and competitions

- conducting surveys and market research for product and service improvement purposes and to compile statistics and analyse trends;
- considering research grant applications and administering research grants; and
- conducting competitions and lucky draws

General administration

- recruiting staff and contractors;
- processing payments and invoicing activities
- answering queries and resolving complaints; and
- using aggregated information for business analysis

Other activities

We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or which are:

- required or authorised by or under law (including, without limitation, privacy legislation); and
- for which the individual has provided their consent

2.2. Direct marketing

We may use personal information of stakeholders, specifically your name and relevant address details, to let you know about our services, products and those of third party partners/contractors/suppliers of acQuire, where we have your consent. We are not permitted to do so unless we have your implied or expressed consent. We and/or our partners/contractors/suppliers may contact you for direct marketing purposes in a variety of ways, including by mail, email, SMS, telephone, online advertising or facsimile.

Opting out

Where you have consented to receiving direct marketing communications from us, your consent will remain current until you advise us otherwise. However, you can opt out at any time, in the following ways:

- **Employees, Customers, Suppliers and every person concerned** can:
 - send a letter to acQuire Technology Solutions Pty Ltd, 26 Kintail Road, Applecross WA 6153 or send an email to privacy@acquire.com.au
 - advise us if you receive a marketing call that you no longer wish to receive these calls; and
 - use the unsubscribe facility that we include in our commercial electronic messages (such as emails and SMSs) to opt out of receiving those messages

Notification of source

If we have collected the personal information that we use to send you direct marketing material from a third party (for example a direct mail database provider), you can ask us to notify you of our source of information, and acQuire's policy is to do so unless this is unreasonable or impracticable.

3. The kinds of personal information we collect and hold

3.1. General

The type of personal information that acQure collects and holds about you depends on the type of dealings that you have with us. For example, if you:

- **are an Employee**, we collect information including your name, address, contact number, gender, date of birth, address, email address, proof of identity details, employment details, educational qualifications, academic results, accreditation details, communication preferences and bank account details; we seek to keep those details updated;
- **contact us with an enquiry**, if you do not take advantage of the option to use anonymity or pseudonymity, depending on the nature of the enquiry, we could record details about you and relating to the enquiry;
- **attend an acQure conference**, seminar or training, we will collect your contact details, address
- **are a supplier to acQure**, we collect contact address details, usually including but not limited to all forms of contact and address, billing information and information about the goods and/or services you supply;
- **are a customer of acQure**, we collect contact address details, usually including but not limited to all forms of contact and address and billing information and any other information related to the use of our technology
- **apply for a job at acQure**, we will collect the information you include in your application for employment, including your cover letter, resume, contact details and referee reports and qualifications;

3.2. Sensitive information

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection. Sensitive information includes health and genetic information and information about 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 preferences or practices, criminal record and some types of biometric information.

acQure's policy is only to collect sensitive information where it is reasonably necessary for our functions or activities and either:

- the individual has consented; or
- we are required or authorised by or under law (including applicable privacy legislation) to do so

For example, we may collect:

- information about your membership of other professional associations
- information about dietary requirements or mobility needs when we conduct events such as conferences and seminars etc;
- copies of medical checks reports and psychometric assessments in the course of the recruitment process
- identification as Aboriginal or Torres Strait Islander;



3.3. Collection of information other than personal information through our website

When you visit the acQuire website, some of the information that is collected about your visit is not personal information, because it does not reveal your identity.

3.4. Cookies

We use cookies to personalise content and ads, to provide social media features and to analyse our website traffic. We also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information you've provided to them or they've collected from your use of their services.

Third party vendors, including Google, use cookies to serve ads based on your visits to our website or other websites.

Google's use of advertising cookies enables it and its partners to serve ads to you based on your visit to our sites and/or other sites on the Internet.

You may opt out of personalized advertising by visiting your Ads Settings.

3.5. What if you don't want to provide your personal information to us?

acQuire's policy is to provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us if it is lawful and practicable to do so. A pseudonym is a name or other descriptor that is different to an individual's actual name.

For example, acQuire's policy is to enable you to access our website and make general queries without having to identify yourself.

In some cases however, if you don't provide us with your personal information when requested, we may not be able to respond to your request or provide you with the product or service that you are seeking.

4. How we collect and hold personal information

4.1. Methods of collection

acquire is required by the Privacy Act also to collect personal information only by lawful and fair means. It is reasonable and practicable, we will collect personal information we require directly from you.

We collect personal information in a number of ways, including but not limited to:

- over the telephone
- through written correspondence (such as letters, faxes and emails);
- on hard copy forms (including event registration forms, network registration forms competition entry forms and surveys);
- in person (for example, business cards or at job interviews)
- through our website
- at seminars and functions
- during training programs;
- electronic systems such as Applications;
- from third parties, including
 - direct marketing database providers;
 - the ATO or DIAC (for example, through correspondence in relation to an Employee)
 - insurers in relation to health insurance contracts and
 - Superannuation companies
 - public sources, such as telephone directories, membership lists of business, professional and trade associations,

4.2. Collection notices

Where acquire collects personal information directly from you, acquire's policy is to take reasonable steps to notify you of certain matters. We will do this at or before the time of collection, or as soon as practicable afterwards. The matters include:

- our identity and how to contact us;
- the purposes for which we are collecting the information;
- whether the collection is required or authorised by or under by or under an Australian law or a court or tribunal order;
- the third parties (or types of third parties) to whom we would normally disclose information of that kind;
- whether any of those third parties are located overseas and, if practicable to specify, the countries in which they are located; and
- the fact that this Privacy Policy contains information about how to access and correct personal information and make privacy complaints and how we will deal with those complaints.

Collection notices may provide more specific information than this Privacy Policy in relation to particular collections of personal information. The terms of this Privacy Policy are subject to any specific provisions contained in collection notices and in the terms and conditions of particular offers, products and services. We encourage you to read those provisions carefully.



Where acQure collects information about you from a third party, acQure's policy is to take reasonable steps to make sure that you are made aware of the collection details listed above and, if you may not be aware that we have collected the information, of the fact and circumstances of the collection.

4.3. Unsolicited information

Unsolicited personal information is personal information we receive that we have taken no active steps to collect, such as an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement or unsolicited mailing lists received from third parties

We may keep records of unsolicited personal information if the Privacy Act permits it (for example, if the information is reasonably necessary for one or more of our functions or activities). If not, acQure's policy is to destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

5. Disclosure of personal information to third parties

Under acQuire's policy, personal information may be disclosed to the following third parties where appropriate for the purposes set out under heading 2 above.

- government and regulatory bodies (such as the Department of Immigration and Citizenship, Australian Education International – National Office for Overseas Skills Recognition and the Department of Education, Employment and Workplace Relations and the Australian Taxation Office) and an individual's migration agent (in connection with applications for General Skills Migration);
- referees whose details are provided to us by job applicants;
- acQuire's service providers, including:
 - information technology service providers;
 - publishers of our handbooks and course material;
 - conference organizers;
 - marketing and communications agencies;
 - mailing houses, freight and courier services;
 - printers and distributors of direct and general marketing material; and
 - external business advisers

In the case of these service providers, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.

6. Cross border disclosure of personal information

acQure operates in a number of international jurisdictions, including South Africa, Chile and Canada. These overseas offices are part of acQure.

However acQure may disclose personal information to third parties located overseas. Some examples include but are not limited to:

- where customers are located in one of the international jurisdictions in which acQure operates, information relevant to the acQure agreements (such as technical support), including personal information may be disclosed to other acQure staff located overseas;
- information about individuals applying for an intra-company transfer may be disclosed to local Government Offices in charge for the decision (in general immigration departments) in any of the countries where acQure is established;
- information about individuals applying for Skills Migration and Work Permit may be disclosed to their migration agents, who may be located anywhere around the world

In each case, acQure's policy is to comply with the requirements of the Privacy Act as amended on 12 March 2014 that apply to cross border disclosures of personal information, as well as with any legal requirements applicable in the relevant jurisdiction.

7. Use of government related identifiers

acquire does not:

- use a government related identifier of an individual (such as a Medicare number or driver's licence number) as our own identifier of individuals; or
- otherwise use or disclose such a government related identifier.

unless this is permitted by the Privacy Act (for example, where the use or disclosure is required or authorised by or under an Australian law or a court/tribunal order).

8. Data quality and security

8.1. General

We hold personal information in a number of ways, including in electronic databases, email contact lists, and in paper files held in drawers and cabinets, locked where appropriate. Paper files may also be archived in boxes and stored in secure facilities. acQuire's policy is to take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant; and
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure

You can also help us keep your information up to date; by letting us know about any changes to your personal information, such as your email address or phone number.

8.2. Security

The steps we take to secure the personal information we hold include ICT security (such as encryption, firewalls, anti-virus software and login and password protection), secure office access and secure office cabinets.

Payment security

acQuire can process some payments using Credit Card, EFTPOS and online technologies. acQuire's policy is to ensure that all transactions processed by acQuire meet industry security standards to ensure payment details are protected.

9. Access and correction of your personal information

Individuals have a right to request access to the personal information that acquire holds about them and to request its correction.

9.1. Employees, Customers, Supplier and every person concerned

You can contact our Privacy Officer (details under heading 11 below) if you would like to access or correct the personal information that we hold about you. We may ask you to verify your identity before processing any access or correction requests, to ensure that the personal information we hold is properly protected.

Correction

If you ask us to correct personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, acquire's policy is to take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If we correct personal information about you, and we have previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask us to notify that other entity. If so, acquire's policy is to take reasonable steps to do so, unless this would be impracticable or unlawful.

Timeframe for access and correction requests

Except in the case of more complicated requests, we will endeavour to respond to access and correction requests within 10 working days

What if we refuse your request for access or correction?

If we refuse your access or correction request, or if we refuse to give you access in the manner you requested, acquire's policy is to provide you with a written notice setting out:

- the reasons for our refusal (except to the extent that it would be unreasonable to do so); and
- available complaint mechanisms

In addition, if we refuse to correct personal information in the manner you have requested, you may ask us to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, and we will take reasonable steps to associate the statement in such a way that will make it apparent to users of the information.

10. Complaints

If you have a complaint about how acquire has collected or handled your personal information, please contact our Privacy Officer (details under heading 11 below).

Our Privacy Officer will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter within a week.

If your complaint can't be resolved at the first instance, we will ask you to complete a Privacy Complaint Form, which details (for example) the date, time and circumstances of the matter that you are complaining about, how you believe your privacy has been interfered with and how would you like your complaint resolved.

Complaints process

We will endeavour to acknowledge receipt of the Privacy Complaint Form within five business days of receiving it and to complete our investigation into your complaint in a timely manner. This may include, for example, gathering the facts, locating and reviewing relevant documents and speaking to relevant individuals.

In most cases, we expect that complaints will be investigated and a response provided within 30 days of receipt of the Privacy Complaint Form. If the matter is more complex and our investigation may take longer, we will write and let you know, including letting you know when we expect to provide our response.

Our response will set out:

- whether in the Privacy Officer's view there has been a breach of this Privacy Policy or any applicable privacy legislation; and
- what action, if any, acquire will take to rectify the situation

If you are unhappy with our response, you can refer your complaint to the [Office of the Australian Information Commissioner](#)



11. Further information

Please contact acQure if you have any queries about the personal information that acQure holds about you or the way we handle that personal information. Our contact details for privacy queries are set out below.

Privacy Officer
acQure Technology Solutions Pty Ltd
26 Kintail Road
Applecross WA 6153
Australia

E: privacy@acquire.com.au

P: + 61 8 9316 6600

F: + 61 8 9316 6699

12. Changes to this policy

We may amend this Privacy Policy from time to time. The current version will be posted on our website and a copy may be obtained free of charge from our Privacy Officer.

Contact

Offices	Australia, Canada, Chile, South Africa
Street address	26 Kintail Road, Applecross, Western Australia, 6153
Postal address	PO Box 933, Canning Bridge, Western Australia, 6153
Telephone	+61 8 9316 6600
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