

This policy sets out how Aurilo manages privacy obligations and reflects the 13 Australian Privacy Principles (APPs) from Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth), which amends the Privacy Act 1988 (Cth).

1. Background Information

1.1 Aurilo Communications is subject to the Commonwealth Privacy Act 1988 (Act). The Privacy Amendment (Enhancing Privacy Protection) Act 2012 which commenced in March 2014 made significant changes to the Act. This Policy complies with the new requirements imposed by the Act.

2. Policy Statement

2.1 Aurilo is committed to managing personal information in an open and transparent way. Aurilo is a registered Australian company and is subject to the requirements of the Act. It adheres to the Australian Privacy Principles (APPs) set out in Schedule 1 to the Act.

3. Policy Purpose

3.1 This Policy sets out how Aurilo collects, holds, uses and discloses personal information including sensitive information.

4. Application of Policy

4.1 Subject to clause 4.2, this Policy applies to all personal information and sensitive information collected and held by Aurilo.

4.2 Despite clause 4.1, any act done or practice engaged in by Aurilo directly related to:

- a current or former employment relationship between Aurilo and an individual, and
- a current or historical employee record held by Aurilo relating to an individual
- are exempt from this Policy in accordance with the Act and the APPs.

5. Privacy Principles

5.1 Personal information collected and held by Aurilo

Aurilo may collect personal information for the purposes of Aurilo's functions and activities. It collects personal information about staff, subcontractors, prospects and clients who have dealings with Aurilo for administrative need or to conduct its core business activities. (Aurilo Communications is a specialist systems integrator of communications technology specializing in the design, implementation and ongoing management of converged voice and data networks.)

Some of the personal information that Aurilo collects (typically employee data only) and holds is sensitive information. Aurilo only collects sensitive information where it is necessary for the purpose for which it is being collected and with the individual's consent unless the collection is required or authorised by law.

Generally, client data held on Aurilo systems is not sensitive by nature and is only high level (e.g. first name, surname, telephone extension numbers only).

5.2 How Aurilo collects and holds personal information

Aurilo collects and holds information from a number of sources. Where reasonably possible, Aurilo will only collect information from the individual to whom it relates. Frequently this will be collected through official administrative processes but it may also be collected from email or e forms.

Personal information is held in both paper and electronic form, including databases.

When an individual accesses the Aurilo website, log files ("cookies") are created by the web server that contain certain information including the Internet Protocol (IP) address of the visitor, the previous site visited, the time and date of access and pages visited and downloaded. Cookies allow a website, such as the Aurilo website, to temporarily store information on an individual's machine for later use. Aurilo's website uses cookies to identify unique visitors to the site.

In order to improve Aurilo's services and assist the user, Aurilo may store information about users of its website to create a digital profile and provide them with information specific to them.

Aurilo also uses Web Analytics to obtain statistics about how its website is accessed. Web Analytics relies upon cookies to gather information for the purpose of providing statistical reports to Aurilo. The information generated by the cookie about an individual's use of the Aurilo website is transmitted to and stored by Web Analytic service providers on servers located within and outside Australia, but it does not include any personally identifying information.

Individual users generally have the option of accepting or rejecting cookies by adjusting the settings in their web browsers. However, rejecting cookies may impact upon the functionality of the Aurilo website.

The Aurilo website may contain links to other websites. Aurilo cannot control the privacy controls of third-party websites. Third party sites are not subject to Aurilo's Privacy Policy or Procedures.

5.3 Notification of collection of personal information

When Aurilo collects personal information it will advise the individual why it is collecting that information and how it uses it, whether the collection of the information is required or authorised by law and the consequences for the individual if the personal information is not collected. It will also provide information about Aurilo's Privacy Policy and about the right of individuals to access and correct personal information. If Aurilo collects personal information in circumstances where the individual may not be aware of the collection it will seek to advise the individual of the collection.

5.4 The purposes for which Aurilo collects, holds, uses and discloses personal information

Aurilo may collect and uses personal information for a variety of different purposes relating to its functions and activities including:

- Hiring of staff and or sub-contractors
- Maintaining data on client systems
- handling complaints
- conducting its business and improving the way in which it conducts its business
- purposes directly related to the above.

5.5 Use or disclosure for secondary purposes

Aurilo does not use or disclose personal information for purposes other than the purpose for which it was collected (the primary purpose) unless:

5.5.1 the individual has consented to a secondary use or disclosure, or

5.5.2 the secondary use or disclosure is related to the primary purpose (in the case of personal information that is not sensitive information) or is directly related to the primary purpose (in the case of sensitive information), or

5.5.3 it is otherwise required or authorised by or under an Australian law or a court/tribunal order.

In ordinary circumstances, any disclosure of personal information for a secondary purpose under must be approved by the Privacy Officer.

5.6 Security

Aurilo applies both physical and information and communications technology (ICT) security systems to protect personal information.

In relation to electronic records, personal information is collected via Aurilo's systems including web-based systems. Aurilo has put in place measures to protect against loss, misuse and alteration of electronic information.

5.7 Unsolicited personal information

When Aurilo receives unsolicited personal information it will assess whether it is personal information that it could legally collect. If it is, it will treat it according to the APPs. If it is not, it will, if lawful to do so, destroy or de-identify it as soon as practicable.

5.8 How an individual may access personal information about the individual that is held by Aurilo

Subject to clause 4.2, anyone has a right under the Act to access personal information that Aurilo holds about them. Access to personal information is governed by the Privacy Officer of Aurilo.

5.9 How an individual may seek the correction of personal information about the individual that is held by Aurilo

Subject to clause 4.2, anyone has a right under the Act to request corrections to any personal information that Aurilo holds about them if they think that the information is inaccurate, out of date, incomplete, irrelevant or misleading.

5.10 How an individual may complain about a breach of the Australian Privacy Principles by Aurilo

Subject to clause 4.2, anyone may complain about a breach of an APP by Aurilo. Complaints should be made in accordance with the Privacy Inquiries and Complaints Procedure.

5.11 How Aurilo will deal with complaints about breaches of the Australian Privacy Principles

Aurilo will deal with complaints about breaches of the APPs in accordance with the Inquiries and Complaints Procedure.

5.12 How Aurilo will manage an actual or suspected data breach under this policy

Aurilo will manage the process of dealing with an actual or suspected breach in accordance with the Data Breach Policy (Procedure and Response Plan).

5.13 Disclosure of personal information to third parties

Aurilo may disclose information to third parties to

- provide services
- promote its activities
- if permitted or required by law, or
- otherwise with the consent of the individual.

Where Aurilo discloses personal information to third parties it will require restrictions on the collection and use of personal information equivalent to those required of Aurilo by the Privacy Act 1988.

6. Roles and Responsibilities

6.1 Approval Authority

The Chief Executive Officer is the Approval Authority for this Policy.

6.2 Governing Authority

The Chief Financial Officer is the Governing Authority for this Policy.

7. Policy Review

Aurilo will review this Policy and the Procedure regularly. It may amend the Policy and Procedure from time to time to ensure their currency with respect to relevant legislation and Aurilo Policy and Procedures and to improve the general effectiveness and operation of the Policy and Procedures.

8. Contact details

Contact for all matters related to privacy, including:

- general inquiries;
- accessing personal information held about you;
- requests to correct personal information held about you; and
- complaints about breaches of privacy,

*should be directed as follows to the Aurilo **Privacy Officer***

E: accounts@aurilo.com.au T: 1380 721 174 P: PO Box 764 North Ryde NSW 1670

Policy	R2V1
Approval	Chief Executive Officer
Responsible Officer	Chief Financial Officer
Effective Date	01/01/2017
Date of Last Revision	Not Applicable
Date of Policy Review *	01/01/2020

* Unless otherwise indicated, this policy will still apply beyond the review date.