

Privacy & Data Breach Reporting Policy

Purpose

Decon Corporation Pty Ltd and all associated entities are bound by law to comply with the National Privacy Principles contained in the federal The Privacy Act 1988 ("the Act").

Decon Corporation Pty Ltd's primary associated companies, include:

- Decon Technologies Pty Ltd
- Decon Industries Pty Ltd;
- R G Ladd Pty Ltd;
- R & D Sheetmetal Engineering Pty Ltd;
- Turnkey Communication & Power Solutions Pty Ltd;

Decon Corporation Pty Ltd and associated entities undertake, as a policy, not to interfere with an individual's Privacy rights in the way we collect, use or disclose the personal information of any persons who provide Decon Corporation Pty Ltd and associated entities with such information in the course of carrying out our business and in accordance with the National Privacy Principles, as contained in the Act.

Decon Corporation Pty Ltd and all associated entities privacy policy is governed by the following:

- Privacy Act 1988 (Inc amendments included effective 12/03/2014)
- Privacy Amendment (Notifiable Data Breaches) Act 2017 (effective 22/02/2018)

Policy

Decon Corporation Pty Ltd and associated entities at all time handles the personal information we collect, use or disclose in a responsible way, that ensures individuals a degree of control over their own personal information.

A Privacy Statement summarising the way Decon Corporation Pty Ltd and associated entities collects, holds, uses and discloses personal information can be found on our website and is available as part of this Company Policies Library. This policy is shared with our employees as part of company induction process.

1. What is personal information?

Personal information is information or an opinion about an individual whose identity is apparent or can reasonably be ascertained. An individual is a natural person and therefore our policy does not extend to information about non-natural persons such as a business or a company, unless that information also constitutes personal information.

Information is still regarded as personal information, even if it not true or correct and whether or not it is recorded in a material form or not.

2. What is sensitive information?

Personal information is sometimes not only personal but also personal and sensitive information.

Sensitive information is information or an opinion about an individual's:

- a) racial or ethnic origin; or
- b) political opinions; or
- c) customer of a political association; or
- d) religious beliefs or affiliations; or
- e) philosophical beliefs; or
- f) customer of a professional or trade association; or
- g) customer of a trade union; or
- h) sexual preferences or practices; or
- i) criminal record that is also personal information.

3. Employee records exemption

An employee record, in relation to an employee, means a record of personal information relating to the employment of the employee. Examples of personal information relating to the employment of the employee are health information about the employee and personal information about all or any of the following:

- a) the engagement, training, disciplining or resignation of the employee;
- b) the termination of the employment of the employee;
- c) the terms and conditions of employment of the employee;
- d) the employee's personal and emergency contact details;
- e) the employee's performance or conduct;
- f) the employee's hours of employment;
- g) the employee's salary or wages;
- h) the employee's customer of a professional or trade association;
- i) the employee's trade union customer;
- j) the employee's recreation, long service, sick, personal, maternity, paternity or other leave;
- k) the employee's taxation, banking or superannuation affairs.

Acts done or practices engaged in by Decon Corporation Pty Ltd and all associated entities where Decon Corporation Pty Ltd and associated entities is or was an employer of an individual are exempt from the application the Act and this policy, if the act or practice is directly related to:

- a) a current or former employment relationship between Decon Corporation Pty Ltd and associated entity and the individual; and
- b) an employee record held by the Decon Corporation Pty Ltd and associated entity and relating to the individual.

This exemption does not apply to prospective employees, contractors, subcontractors or temporary staff who are employees of a recruitment agency of Decon Corporation Pty Ltd and any associated entity.

4. Types of personal information Decon Corporation Pty Ltd or an associated entity collects and holds for the purposes of collecting and holding such information from its customers or suppliers.

Decon Corporation Pty Ltd and all associated entities provide or obtain a range of goods and services to customers or from its suppliers respectively.

As part of these actions we collect personal information including the following personal information;

- a) Contact details, names and addresses both residential and e-mail, positions held and or title of individual.
- b) A record of the purchase of goods or utilisation of services, by customers and the means by which they pay for these goods and services.
- c) Personal information about a range of contract businesses we deal with in the provision of our services, such as name, position, and the organization worked for and contact details.
- d) A record of the applications made for job seekers
- e) A record of both internal and external e-mails as outlined in our e-mail policy; Some of these e-mails may contain personal information
- f) A record of the personal details of our contractors and external consultants, including contract and payment details

5. Decon Corporation Pty Ltd – Human Resources Department (HR)

All enquires on this policy, requests for access, requests for correction and complaints must be referred to HR.

6. Decon Corporation Pty Ltd and associated entities application of the National Privacy Principles

6.1 Decon Corporation Pty Ltd and all associated entities only collects personal information that is necessary for one or more of our activities or functions as a Service Provider and in providing a range of customer services to our customers.

a) Decon Corporation Pty Ltd and all associated entities undertaking on the collection of personal information

At or before the time (or if that is not practical, as soon as practicable after), Decon Corporation Pty Ltd and associated entities collect personal information about an individual from the individual, Decon Corporation Pty Ltd or an associated entity will take reasonable steps to ensure that the individual is aware of:

- Our identity and how to contact us; and
- The fact that he or she is able to gain access to the information; and
- The purposes for which the information is collected.

b) Use and disclosure of personal information

Decon Corporation Pty Ltd and all associated entities will not use or disclose personal information about an individual for any secondary purpose, other than the primary purpose of the collection unless that secondary purpose is related (directly related in the case of sensitive information) to the secondary purpose and the individual would reasonably expect the disclosure in the circumstances or unless CONSENT has been given.

c) Marketing of our products and services

Decon Corporation Pty Ltd and all associated entities will in each direct marketing communication with an individual will make individuals aware that they can express a wish not to receive any further communications.

d) Data quality

Decon Corporation Pty Ltd and all associated entities will take all necessary steps to ensure that any personal data we collect, use or disclose is up to date and accurate.

Employees, Customers or Suppliers can update their contact details at any time by sending an email or letter to the attention of the Human Resources Department at Decon Corporation Pty Ltd.

E-mail address: HR.Admin@deconcorp.com.au

e) Data security

Decon Corporation Pty Ltd and associated entities take all necessary steps to protect the personal information we hold from any misuse, unauthorised access, modification or disclosure. See our ISMS policy for further details.

f) Openness

This Privacy Policy is available to anyone who requests a copy, as is the Privacy Statement, which is a summary of this Policy.

Further upon request Decon Corporation Pty Ltd and associated entities will make available to any person or organisation the sort of personal information we hold to that person and the purpose of collecting, holding, using and disclosing such information

g) Access to personal information

Where Decon Corporation Pty Ltd or associated entity holds personal information about individuals those individuals will be able to access that personal information upon request. Requests for access must be made to Decon Corporation Pty Ltd's Human Resources Department and must be made by completing an access request form.

The Human Resources Department will acknowledge your request within a reasonable period and will provide you, if appropriate, with the information requested as soon as practicable.

Decon Corporation Pty Ltd and all associated entities reserve the right to hold all documents lodged or arising out of or in connection with any request for access to personal information for the purpose of obtaining legal advice or for demonstrating compliance with the Act, the National Privacy Principles and this Policy.

h) Fees for access

Decon Corporation Pty Ltd and all associated entities do not charge any fee for the lodging of a request for access and access can be requested by completing an access request form.

i) Correction of personal information

Where Decon Corporation Pty Ltd or an associated entity holds personal information about an individual and that individual is able to demonstrate that the information is inaccurate, incomplete or not up to date, Decon Corporation Pty Ltd or an associated entity will take steps to correct, complete or update the personal information.

A request for correction must be made by using the Request for Correction form and any personal information will only be changed after the individual has positively identified himself or herself.

j) Sensitive information

Decon Corporation Pty Ltd or an associated entity does not collect sensitive information about an individual unless they have consented or it is required or authorised by law or the collection is necessary for the establishment, exercise or defence of a legal or equitable claim or the information relates solely to our customers or to individuals who have regular contact with us in connection with our activities and at or before the time of collecting the information the organization undertakes to the individual whom the information concerns that the organization will not disclose the information without the individual's consent.

7. Decon Corporation Pty Ltd or an associated entity policy towards Data Breach and Data Breach reporting

Decon Corporation Pty Ltd or an associated entity has identified the following types of Data Breaches applicable to its operation under the Privacy Amendment (Notifiable Data Breaches) Act 2017:

- Information Security Breach - any incident that results in unauthorised access of data, applications, services, networks and/or devices through bypassing underlying security mechanisms (e.g. firewalls).
- Personal Information Breach – involves unauthorised access or disclosure of personal information, whether intentional or unintentional, whereby personal information is potentially viewed, shared, stolen, removed, destroyed or used by an individual unauthorised to do so. Examples: staff mistakenly providing personal information to the wrong person or sending it to the wrong email address; lost or stolen laptops or paper records; inappropriate disposal of paper records or digital storage media.
- Financial or Human Resources Information Breach – involves unauthorised access or disclosure of financial and human resources information containing personal information of individuals (e.g. bank account details, tax identification information of employers, suppliers, etc.), whether intentional or unintentional.
- Environmental Breach – arises when information management facilities or operating conditions for recording or storing personal information are not safe or secure or due to unforeseen environmental factors (i.e. fire, storms and flood, power outage).

In all above cases, the matter is to be reported immediately to the Human Resources Department who will instigate the following actions on behalf of the Company.

7.1 Immediate Actions

- initiate steps to contain and remedy the data breach. For example:
- stop the unauthorised practice;
- recover any records;
- shut down the system that was breached. If it is not practical to shut down the system, then revoke or change the account privileges or block access from the unauthorised person.

7.2 Evaluate the risks associated with the breach

Evaluate the risks associated with the breach and its effect on individual or organisation considering the following factors:

- the type of personal information involved in the breach (e.g. personal financial information, tax file numbers, personal contact details).
- the context of the affected information and breach (e.g. how was the information used)
- the cause and extent of the breach (e.g. what was the source of the breach? Is there a risk of further exposure of the information? Is this a recurring problem of the system?)
- the risk of serious harm to the affected individuals
- The risk of other harms (e.g. loss of public trust, reputational damage, loss of assets, financial exposure, legal liability).

Additional guidance on each of the above factors is provided in the OAIC Data breach notification guide:

Refer - <https://www.oaic.gov.au/privacy/guidance-and-advice/data-breach-preparation-and-response>

i. Notification

- Determine if the breach is an “eligible data breach” requiring mandatory reporting to the OAIC.
- For additional information/instruction refer to
- Office of the Australian Information Commissioner (OAIC) - <https://www.oaic.gov.au/>

ii. Documentation and prevention

- Details of all Data Breach cases are to be documented by the Human Resources Department as operational incidents. As part of handling of every Data Breach case, suitable preventive action plan is to be implemented to ensure similar scenarios of Dara Breach are prevented.

8. Decon Corporation Pty Ltd - Website

The Decon Corporation Pty Ltd website is at <http://www.Deconcorp.com.au>. This website is maintained as a service to customers and to allow prospective customers to make enquires about us or purchase from us. Wherever we collect personal information on the website, it is clearly indicated on the website along with our other privacy obligations. The information collected on our website will only be used for the purposes as stated therein.

Some information about the way in which customers use our website is tracked for the sole purpose of developing our website as a user-friendly easily negotiable resource and for no other purpose. This information is not disclosed to any other organization and does not form part of any direct marketing exercise to customers.

9. Implementation of Decon Corporation Pty Ltd or an associated entities Privacy Policy

All Decon Corporation Pty Ltd or an associated entity employees, who have access to personal information receive training in Decon Corporation Pty Ltd's Privacy Policy and procedures and the National Privacy Principles and will collect, use, hold, store and disclose any personal information in accordance with the National Privacy Principles and this Policy.

Failure to abide by this policy of any employee may result in counselling, disciplinary action, and where a serious breach occurs may include the possible termination of their employment.

10. Complaints of interference with Privacy

Any individual who believes that Decon Corporation Pty Ltd or an associated entity may have interfered with their right to privacy as set out in the National Privacy Principles and this Policy can make a complaint to the Human Resources Department.

11. The complaint form

A complaint form specifying the exact nature of the complaint, who has made the complaint and the action being sought must be completed on the Decon Corporation Pty Ltd or an associated entity Privacy complaint form.

Complaint forms are available from Decon Corporation Pty Ltd by email HR.Admin@deconcorp.com.au, and should be marked Confidential and addressed to the Human Resources Department at Decon Corporation Pty Ltd.

12. Complaint process

After receipt of a complaint lodged with Human Resources the allegation will be investigated. After the investigation has been conducted, the Human Resources Department will respond in writing to the individual who has complained with the outcome of the investigation. Should an interference with an individual's privacy be acknowledged the Human Resources Department will then take steps to rectify the interference. The Human Resources Department will respond in writing as soon as it is practical to do so.

Decon Corporation Pty Ltd or an associated entity reserves the right to hold all documents lodged or arising out of or in connection with any complaint of an interference with privacy for the purpose of obtaining legal advice or for demonstrating compliance with the Act, the National Privacy Principles and this Policy

An individual who believes Decon Corporation Pty Ltd or an associated entity has interfered with their privacy and who is not satisfied that they have had an appropriate response from Decon Corporation Pty Ltd or an associated entity the individual can contact the federal Privacy Commissioner. The website of the Australian Privacy Commissioner is www.privacy.gov.au or telephone 1300 363 992.

Printed Copy Not Controlled

Version	Date Reviewed	Policy Approved By	Update
v1.0	01/03/2018	Catherine Faul	New Policy