



# PRIVACY POLICY

Kinetic IT is an APP entity for the purposes of the Privacy Act 1988 (Cth) (Privacy Act) and is subject to the Australian Privacy Principles (APPs) that form Schedule 1 of the Privacy Act. The APPs prescribe the manner in which an entity may collect, use, disclose, store, secure and dispose of Personal Information.

A copy of the APPs is available on the website of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

This Privacy Policy sets out Kinetic IT's approach to managing Personal Information in accordance with the APPs.

## WHAT IS PERSONAL INFORMATION?

The Privacy Act defines 'personal information' as:

information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true; and
- (b) whether the information or opinion is recorded in a material form or not.

The Act also defines subsets of Personal Information, such as sensitive information and health information, which are subject to additional protections.

Not all Personal Information is necessarily protected by the Privacy Act, however, and to this extent is not embraced by this Privacy Policy. The Act does not regulate the handling of employee records, and it will not always protect technical data about a device or service. De-identified information, and information about deceased persons, is not protected.

## WHOSE PERSONAL INFORMATION IS COLLECTED?

Kinetic IT collects Personal Information from a range of individuals including:

- our employees and contractors
- applicants for employment
- our suppliers, customers and business partners
- industry representatives
- users of Kinetic IT's website and social media channels.

Our website uses various types of cookies. Cookies are small text files which are placed on your computer when you visit our website in order to improve the efficiency of your interaction with the website. If and to the extent that the use of cookies involves the collection of Personal Information, that information will be managed in accordance with this Privacy Policy.

## WHAT KIND OF PERSONAL INFORMATION DOES KINETIC IT COLLECT?

Personal Information that Kinetic IT collects may include:

- personal information related to employment or business including names, addresses, phone numbers, email addresses
- personal information related to business transactions and finance such as bank account and credit card details
- personal information related to human resources
- personal information related to general business purposes

## WHY DOES KINETIC IT COLLECT PERSONAL INFORMATION?

Kinetic IT collects, holds, uses and discloses Personal Information for the primary purposes of providing our services, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose. In the case of direct marketing, Personal Information (other than 'sensitive information') will only be used in circumstances where you would reasonably expect such use or disclosure and, in the case of electronic marketing, in compliance at all times with the requirements of the Spam Act 2003 as well as the Privacy Act. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

Kinetic IT will not distribute Personal Information to any third party unless consent has been granted to do so or where Kinetic IT is required to do so by law.

## HOW DOES KINETIC IT SECURE PERSONAL INFORMATION?

In accordance with APP11, Kinetic IT takes reasonable steps to protect Personal Information that it holds from misuse, interference and loss as well as unauthorised access, modification or disclosure. Kinetic IT utilises a range of approaches to secure Personal Information including:

- technical safeguards (such as firewalls, encryption and access controls)
- internal process and policies that limit access to Personal Information
- confidentiality agreements

When the Personal Information held by Kinetic IT is no longer required, Kinetic IT will take reasonable steps to destroy or de-identify the personal information that it holds—however in most circumstances Kinetic IT will hold the Personal Information for a period of 7 years.

## OVERSEAS RECIPIENTS

As a general principle, Kinetic IT does not seek to transmit or store Personal Information overseas. An obvious exception may arise where an individual is located overseas and requires Kinetic IT to communicate with them.

Circumstances may nevertheless arise in which Kinetic IT resolves to transfer or store Personal Information overseas. If it does so, and if

- the overseas recipient is not located in a jurisdiction with privacy laws substantially similar to the Australian Privacy Principles, or
- it is not possible to obtain your express informed consent or to infer such consent in all the circumstances, it will take reasonable steps to ensure your data is handled in a manner consistent with the Australian Privacy Principles.

## ACCESS TO YOUR PERSONAL INFORMATION

With some exceptions, you are entitled to access your Personal Information held by Kinetic IT and, where required, to request Kinetic IT updates or corrects your Personal Information (subject to certain exceptions). If you wish to access your Personal Information, please contact Kinetic IT (using the contact details below) in writing. Kinetic IT will not charge any fee for your request to access your Personal Information, but, may charge an administration fee for providing you with a copy of your Personal Information. In order to protect your Personal Information, we may require identification from you before releasing the requested information.

## ACCURACY OF YOUR PERSONAL INFORMATION

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, incomplete, irrelevant or misleading, please advise us as soon as practicable so we can update our records. If we disagree that the information is inaccurate, we are not required to amend that information, but you may have the right to request the attachment of a statement which sets out your views on the accuracy of the data.

## POLICY UPDATES

This Policy may change from time to time. The current version will always be available on our website.

## ENQUIRIES AND COMPLAINTS

If you require further information about how Kinetic IT helps safeguard your privacy, wish to update your details, or if you have any complaints about our compliance with the Australian Privacy Principles, please contact us at:

The Privacy Officer

Kinetic IT

30 The Esplanade

Perth WA 6000

08 9238 0000

[privacy@kineticit.com.au](mailto:privacy@kineticit.com.au)

All complaints will initially be managed by the Kinetic IT Privacy Officer who may contact you to discuss the complaint. If, after 30 days from the date the complaint is received, the complaint remains unresolved, either party may refer the complaint to the OAIC.