

# Jerico Group - Our Approach to Privacy

## ABOUT THIS POLICY

This policy sets out how personal information held by the Jerico Group Proprietary Limited (JERICO) is managed and protected in compliance with the *Privacy Act 1988* (Cth) (Privacy Act), the Australian Privacy Principles (APPs).

This policy contains information about JERICO's collection, use, disclosure and storage of personal information, including sensitive information, and how you may access and correct personal information that we hold.

We take your privacy seriously and make all efforts to protect your personal and/or sensitive information from misuse, interference, loss and from unauthorised access, modification or disclosure.

If you wish to make a complaint about JERICO's handling of your personal information, please refer to the Complaints section of this Policy.

### 1. WHO SHOULD READ THIS POLICY

This Policy is relevant to people whose personal information is collected, stored, used or disclosed by JERICO including:

- The details of customer(s) enquiring about or who have purchased a JERICO product or service.
- The details of people who have made enquiries or complaints to JERICO.

### 2. REMAINING ANONYMOUS OR USING A PSEUDONYM

You have the option of not identifying yourself, or using a pseudonym, when dealing with JERICO, for example, to make an enquiry or complaint.

However, in circumstances where we are required or authorised to deal with an identified individual by or under law, or where it is impracticable for us to deal with you anonymously or pseudonymously (such as where a product or service we offer requires), this option will not be available to you.

### 3. WHAT KINDS OF INFORMATION DO WE HOLD?

JERICO may collect or hold *personal information* that is reasonably necessary for, or directly related to, the performance of business functions and activities, including;

- names and signatures
- personal contact details such as address, email address, phone number (including mobile phone)
- proof of identity documents
- gender
- dates of birth

- photographs of people
- CVs, employment history, transcripts and referee reports
- financial information provided by customers, contractors and consultants
- bank details where JERICO is required to make payments
- child exploitation and abuse notifications under the our Child Protection Policy
- social media username, IP address and email address when responding to online comments or enquiries (for more information about JERICO's social media pages please see Disclaimer)
- username and password information where we manage online interactions on your behalf.

JERICO may also collect or hold *sensitive information*, including

- Criminal and police history information, for example in vetting employees, contractors or your suitability in accordance with our policies and procedures for our services.
- religious or philosophical beliefs, for example when provided by staff as part of a security assessment process.

In this policy, personal information and sensitive information has the meaning given to these terms in the Privacy Act.

#### **4. WHY WE MIGHT COLLECT YOUR PERSONAL INFORMATION**

Personal information is collected where it is necessary for, or directly related to, the performance of our business functions and activities.

Some examples of why we might collect your personal information include:

- to enter into an agreement/contract with you
- to respond to your complaint
- to respond to your enquiry or request for information
- in order to invite you to an event
- to manage the recruitment, personnel and corporate functions of JERICO
- to conduct surveys and stakeholder consultation purposes
- to administer our policies and procedures
- to delivery the goods or services we offer
- to help administer your account.

Information collected for a primary purpose may sometimes be used or disclosed for a related secondary purpose.

For example, information collected from a contractor may be used as part of an evaluation or review of a particular project delivered by that contractor.

Employee information collected to administer an individual's employment may be used or disclosed during a workplace investigation initiated by that individual.

## 5. HOW WE COLLECT PERSONAL INFORMATION

JERICO collects personal information only by lawful and fair means.

It is our usual practice to collect personal information directly from you or your authorised representative when you deal with us by telephone, letter, email, face-to-face or online.

In particular, JERICO collects your personal information when you use one of the websites maintained by JERICO, including the following websites and their sub-domains

- Jerico.group

We may collect the personal information provided to us via online forms on these websites including when you subscribe to a list, register or purchase a product or service. We may also collect cookies, IP addresses and cached information from forms.

Content on JERICO's social media pages is publicly viewable and searchable and is not confidential.

More information about how JERICO will handle your personal information when engaging via our website or social media is available at Disclaimer.

We may collect personal information from another source including a third party where you consent, where it is unreasonable or impractical to collect the information only from you or where we are required or authorised to do so by law. For example:

- in assessing a special circumstances relating to children, we may seek to contact a non-consenting parent or other persons for further information.
- we may collect personal information from third parties or publicly available sources.
- we may collect information about individuals whose personal information is collected in the course of, or in connection with JERICO's products and services and other operations, including where necessary individuals in another country.
- we may collect personal information from Australian Government agencies and State and Territory Government agencies where required or authorised to do so by law. A none exhaustive list of common agencies are:
  - Australian Criminal Intelligence Commission
  - Australian Federal Police and State and Territory police
  - Attorney-General's Department
  - Australian Taxation Office
  - Department of Home Affairs
  - Department of Human Services (including Centrelink)
  - Department of Social Services
  - State and Territory child protection agencies.

JERICO may collect 'sensitive information' about you with your express or implied consent, where the collection is required or authorised by law or where JERICO is otherwise permitted under the Privacy Act.

We may also collect personal information when you communicate with us through social networking services such as Twitter, Facebook, Instagram, LinkedIn and YouTube.

For example, we may collect your name, social media handle and text or images you post to help us communicate with you and for public outreach and diplomacy activities. See our Social Media Terms of Use for further details.

We may also collect your personal information through monitoring services that access open-source information, such as media monitoring services.

## **6. HOW WE STORE AND PROTECT PERSONAL INFORMATION**

Personal information held by JERICO is managed securely through our recordkeeping system.

We take physical and electronic security measures to protect your personal information from misuse, interference, loss and from unauthorised access, modification or disclosure.

JERICO's electronic records management system, network drives and virtual server environment are hosted within Australia.

We secure electronic information using firewalls, secure databases, secure online systems, password protection for electronic files, and multi-factor authentication.

We restrict physical access to our offices and secure physical files using secure cabinets and containers.

Staff members across JERICO have access to personal information on a need-to-know basis only.

Sensitive personal information stored in our databases can only be accessed by authorised users to work on particular enquiries, complaints, applications, and/or cases. These databases have an audit trail whenever personal information is included, amended, or deleted.

When no longer required to be retained as part of a record, personal information may be destroyed.

## **7. HOW WE USE AND DISCLOSE PERSONAL INFORMATION**

We will generally only use your personal information for the primary purpose for which it was collected.

For example, to provide individuals with assistance, to assess an application to take up a JERICO product or service, or to respond to enquiries.

We may also use or disclose your personal information in accordance with the Privacy Act, including where:

- you have consented to use or disclosure for a secondary purpose
- you would reasonably expect the information to be used or disclosed for a secondary purpose which is related to the primary purpose, or in the case of sensitive information, where the secondary purpose is directly related to the primary purpose
- it is required or authorised by or under law
- it is necessary for our business functions or activities
- it is reasonably necessary for an enforcement activity conducted by or on behalf of an enforcement body.

The following are some examples of how we may use and disclose personal information:

- if you make an enquiry for information or write to JERICO making representations on a particular issue, we may disclose your personal information to another party so that your enquiry or correspondence is addressed appropriately.
- The personal information provided in your application will be used to assess your application and administer the products and services you are entitled to use.
- Where you sell a product or service via a JERICO platform, we may be required by law to pass on your personal information to the Australian Taxation Office or other Australian regulatory body.
- where we share content originally published on Your or other individuals', entities', Governments' or Government bodies' social media accounts.

Sometimes, we will pass your personal information to other government agencies or organisations, including overseas governments or organisations, for the purpose of assisting with your enquiry or application, including:

- Australian Taxation Office
- Department of Home Affairs
- Department of the Prime Minister and Cabinet
- Attorney-General's Department
- Australian Federal Police and State and Territory police
- Australian Criminal Intelligence Commission
- Department of Human Services (including Centrelink)
- Department of Social Services
- State and Territory child protection agencies.

## **8. DISCLOSURE OF PERSONAL INFORMATION TO OVERSEAS RECIPIENTS**

JERICO's core services can include the provision of products you purchase.

In order to do this, it is likely that some personal information (name and address) will be disclosed to overseas recipients where they provide this product.

We do not disclose your personal information to any overseas recipient unless one of the following applies:

- the recipient is subject to a law or binding scheme substantially similar to the Australian Privacy Principles, and you can access mechanisms for protecting your privacy
- you have consented to the disclosure after being expressly informed that JERICO will not be responsible for the overseas recipient's handling of your personal information
- it is required or authorised by or under law
- we reasonably believe it is necessary for our core services and activities or another permitted general situation applies
- it is required or authorised by an international agreement relating to information sharing to which Australia is a party

- it is reasonably necessary for an enforcement related activity conducted by, or on behalf of, an enforcement body and the recipient performs similar functions.

To perform JERICO's functions, we may disclose your personal information in accordance with this privacy policy, to any overseas recipient located in a country within the geographical bounds, of the following regions:

- a. Africa
- b. Asia
- c. Europe
- d. Latin America
- e. South America
- f. the Caribbean
- g. Northern America
- h. Oceania

## 9. HOW TO ACCESS OR CORRECT YOUR PERSONAL INFORMATION HELD BY JERICO

You can request access to, or correction of, personal information we hold about you by contacting us at [info@Jerico.group](mailto:info@Jerico.group). We may ask you to verify your identity before we give you access to, or correct, your information.

We will allow access or correct the information unless we are required or authorised under the Privacy Act, the *Freedom of Information Act 1982* or other relevant law to refuse access or correction.

If we do not correct your personal information, we will take reasonable steps to associate a statement with your file which addresses the personal information you believe to be inaccurate, out-of-date, incomplete, irrelevant or misleading upon request.

## 10. HOW TO OPT-OUT FROM EMAIL SUBSCRIPTION LISTS

If you receive emails via a subscription to one of our mailing lists, you are able to manage your subscription or opt-out (unsubscribe) from further emails using the links provided in the message. If you are unable to find opt-out instructions or you continue receiving messages after opting out, please send an email to [info@Jerico.group](mailto:info@Jerico.group) for assistance.

## 11. COMPLAINTS

We take your privacy seriously and make all efforts to protect your personal information from misuse, interference, and loss; and from unauthorised access, modification or disclosure.

If you wish to make a complaint about how JERICO deals with your personal information, you can contact us on the details below.

To assist JERICO to gather relevant information about your complaint, please provide as much information as possible in describing how you think your privacy has been interfered with, including:

- What happened
- When it happened (including dates)

- What personal information of yours was affected
- Who did it (include individual names if known)
- How and when you found out about it
- Your contact details
- Any other relevant information, including what, if any, outcome you might be expecting from the complaint process.

If the alleged privacy breach involves personal information which does not belong to you, we will ask for evidence that you have authority to act on behalf of the person before proceeding any further. Your complaint will be considered by a JERICO officer who has not been involved in the conduct about which you are complaining.

We will provide a written response to your complaint. If a breach of the APPs has been identified as a result of your complaint, we will advise you of the findings. We aim to provide you with a response within 30 days.

If you are not satisfied with our response, you may wish to submit a complaint to the Office of the Australian Information Commissioner.