

# Privacy Policy

## Your Privacy, Our Concern

At GSI we are committed to protecting your Privacy in accordance with the Australian Privacy Principles and the Privacy Act 1988 (Cwth). This Privacy Policy describes our practices on how we collect, update, use, store, secure, and where necessary disclose, your personal information (including sensitive information), how you can access the personal information we hold and how to have that information corrected.

This privacy policy applies to all directors, officers, employees, contractors and consultants of the organisation including the collection, updating, use, storage, disclosure, and access to personal and sensitive information that can be recorded in any format including but not limited to information held in writing, online, digitally, or by electronic means including mobile phones and USB Sticks.

Where this Privacy Policy refers to us, we and our, this means Gold Seal International Pty Ltd (ABN 29 614 736 015).

## Personal Information We Collect

Personal or sensitive information collected by us could include information such as (but not limited to) name, address, user identification, email address, telephone number(s), fax number, driver's licence, date of birth, employment details, payment details (account / credit card information) and relevant sensitive information (e.g. medical or criminal history) that is required for a specific purpose.

All individuals have the option to act anonymously and with pseudonym, unless: It is impracticable for us to deal with individuals who have not identified themselves or have used a pseudonym or we are required and authorised under Australia Law, Australian Court or Australian Tribunal order, to deal with individuals who must identify themselves.

## How We Collect Your Personal Information

We may collect personal or sensitive information in several ways, including; during compliance and other audits and reviews, on registration forms, on our website, over the telephone, in writing, via email, fax and directly from third parties which may include employers, insurers or other financial services, businesses, including managing agents, insurance brokers and underwriting agencies or the like. We will only collect the information by lawful and fair means without unwarranted authority and in a way that is not unreasonable or intrusive.

## Our Purpose for Collecting Holding and Using Your Personal Information

We will only collect, and store personal or sensitive information that is necessary for our functions and activities and to provide services as requested. However, we may use your information when we send invoices, newsletters, provide training and education services and results, information and notification of special offers, events or articles that we believe may be of interest to you. If you prefer not to receive any

promotional information of this nature or communications in the future, you can unsubscribe by hitting the “unsubscribe button” or by notifying us directly.

### **Disclosure of Your Personal Information**

We will only disclose information about you to others on a needs basis including; audit and compliance reporting (including to insurers, insurance brokers, underwriting agencies or the like), for credit card related functions, reporting of training and education results, to government and statutory authorities and where permitted by law. Some companies to whom we disclose personal information may be located overseas. We will not provide personal information to organisations or individuals outside Australia unless we are satisfied that they are regulated by laws which protect personal information in a way that is similar to the Privacy Act. You acknowledge that, by consenting to the disclosure of your personal information to these entities outside Australia, we will no longer be required to take reasonable steps to ensure that the recipient does not breach the applicable Privacy Principles of the Privacy Act 1988 (Cwth) in relation to your personal information.

### **Data Quality, Access and Correction of Personal Information**

We will take all necessary steps to ensure that all personal or sensitive information we collect, store and use or where appropriately disclosed to others, is accurate, complete, up to date and relevant. Should an individual make a request to amend, correct or update the information, we will take reasonable steps to ensure our records are updated. However, should we not wish to correct the personal information, as requested by the individual, we will provide:

- Reasons why the refusal is being given except to the extent that it will be unreasonable to do so;
- Information on how to complain about the refusal or;
- Any other matter prescribed by regulations.

Should you make a request to access your personal information, it will be provided via written response within 30 days of the formal request. Should the information requested be unlawful, pose a serious threat to life, health or safety of an individual or impact on the privacy of an individual, the information will not be provided. We will notify you of the basis of our denial of access to the information.

### **Security of Your Personal Information**

Reasonable steps will be taken to ensure that all personal and sensitive information held by our organisation for any individual will be protected. We are committed to reducing the number of fraudulent activities that we face and our policy is to prosecute any cases of fraud that we identify. As a result, any unauthorised access, modification or disclosure of information that we may identify will be managed in accordance with the Notifiable Data Breach Scheme. All individuals should maintain their own security (e.g. protection of usernames, logins, passwords, etc.) measures to ensure their personal information is protected. Any information that is no longer required for its relevant purpose or is collected and not permitted to be, will be destroyed or de-identified in an appropriate manner that is lawful and reasonable.

## **Cookies & Anonymous Data**

In order to collect anonymous data, we may use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computers hard drive. Sometimes, they identify users where the website requires information to be retained from one page to the next. Cookies are not used for marketing purposes nor do we track your activity after you leave our website.

We use technology to collect anonymous information about the use of our website (e.g. IP address). This information does not identify you personally; it is only used for internal purposes, to improve the content and functionality of our website, to better understand our clients and help improve our services.

Our website may contain links to third party websites, however we do not accept responsibility for the content or privacy practices of those websites or any other products or services offered by them.

## **How to Make a Complaint**

Should you have any concerns about whether we have complied with the Privacy Act or this Privacy Policy when collecting or handling your personal information, please write to our Privacy Officer at GSI by email [enquiries@gsipro.com.au](mailto:enquiries@gsipro.com.au).

All complaints will be investigated by our Privacy Officer and you will need to supply sufficient information and supporting evidence of such complaint. We will contact you if we require any additional information and notify you in writing of the outcome of the investigation. We will endeavour to resolve your complaint within 14 working days. Should we not be able to resolve your complaint within 14 days, we will contact you to advise what the expected timeframe is to resolve the complaint. Should you not be satisfied with the outcome, you can contact the Australian Information Commissioner via [www.oaic.gov.au](http://www.oaic.gov.au) who has the power to conduct investigations and resolve complaints.

## **Your consent**

By asking us to assist with your compliance, training, education or technical requirements, you consent to the collection and use of the information you have provided us with for the purpose of the above.

## **Tell us what you think**

We value your feedback, therefore any concerns, complaints or comments you wish to make, please do so by contacting our Privacy Officer by email [enquiries@gsipro.com.au](mailto:enquiries@gsipro.com.au).