



Privacy Policy

1. Scope

ANATE Corporate Group (ABN 20 660 011 718) and its Related Entities (**We, Us**) are committed to protecting your privacy. This document provides you with information on how we collect, use, store and disclose your personal information.

We will adhere to the provisions of the Australian Privacy Principles (**APPs**) which are contained within the Privacy Act, in relation to how we collect, use, disclose and protect your Personal Information.

Where applicable, we also adhere to the requirements of the EU General Data Protection Regulation (**GDPR**).

This policy aims to provide you with information to understand how We collect, use, store and disclose your Personal Information in accordance with the APPs and the GDPR. This policy applies where we are a 'data controller' in relation to your Personal Information. That is, where we are in control of the purposes and methods of processing your Personal Information.

Our legal basis for the collection, storage, use and disclosure of your Personal Information arises from your consent to this policy, the protection of our legitimate interests, including the delivery and improvement of our Services.

2. Definitions In this policy:

- **Cookie** means a small piece of data stored on your device used to access our Website.
- **Personal Information** has the meaning given under the Privacy Act.
- **Privacy Act** means the *Privacy Act 1988* (Cth).
- **Related Entities** has the same meaning as under the *Corporations Act 2001* (Cth) and includes our franchisees.
- **Sensitive Information** has the same meaning as under the Privacy Act.
- **Services** means the offers and services provided by us or the companies and individuals we work with us including, but not limited to, employment referrals, clinical, practical and theoretical training and professional development for the purposes of providing healthcare related services and the like to third parties.
- **Website** means www.anate.com.au, anate.com.au and includes other forms of social media where you post comments, or we interact with you.

The meaning of any general language is not restricted by any accompanying example and the words 'includes', 'including', 'such as', 'for example' or similar words are not words of limitation.

3. What Personal Information do we collect and why do we need it?

To provide you with our Services, comply with relevant, local, state and National Health provider regulations or if you apply for training or employment with us, including by using the links on our Website, we need to collect Personal Information. If we do not collect the Personal Information or if any of the Personal Information you provide is incomplete or inaccurate, we may not be able to provide the Services or process a training or job application or the employment process may be compromised.

Depending on the nature of the Services we provide to you, the personal information we collect may include:

- your name, email address, telephone numbers as well as residential and/or mailing address;
- any information you provide if you apply for a job with us, including your qualifications and educational attainments;
- date of birth;
- Sensitive Information, for example, if you advise us of any medical conditions such as allergies;
- Vaccination and Immunisation records.
- Police checks
- Professional licences (i.e., Registered Nurse registration identification numbers)
- credit card details; and
- any other Personal Information relevant to the Services we provide to you.

4. How do we collect the Personal Information?

We aim to collect Personal Information directly from you. We may also collect Personal Information:

- through our Website and by other electronic communication channels (e.g., when you send us an email or post an entry on social media);
- from third parties;
- from publicly available sources of information;
- when we are required to do so by law;
- when you log onto or connect to our Website and our server automatically records information your browser sends (e.g., your IP address, how and when you travel through our Website, the pages and documents accessed, information about your

usage, e.g., by way of cookies and other information provided by downloading information from our website). However, unless your name is part of your email address or you specifically provide it, our server does not automatically collect this information. You can also adjust the settings on your computer to decline any cookies if you wish;

- over the phone, if you tell us information about you;
- from a third party engaged by you (such as a web developer);
- if you use any of our online forums;
- when you enter a competition or promotion with us, participate in a survey or register to receive information from us or register to receive information on any of our Services.
- If at any time you supply Personal Information to us about any other person (e.g., another member of your household or you post a photo on our Website), you represent, and we accept that information on the basis that you are authorised to do so, and that the relevant person has consented to the disclosure to us.

This privacy statement only covers the collection of Personal Information by our sites only and does not cover the collection of Personal Information from other third parties you access via a hyperlink or otherwise on our sites, whether affiliated with us or not.

5. How do we use your Personal Information?

We use the Personal Information we collect for operational purposes and to:

- provide our Services;
- managing training and employment applications;
- managing training and employment records;
- managing employee records;
- running our website;
- comply with our licensing and other legal obligations;
- process your inquiries and improve our Services, including to assist our staff training and development initiatives;
- advise you of additional services or information which may be of interest to you;
- provide your contact details to companies and individuals who have agreed to provide you with the offers described on our Website (you may opt out of receiving this information at any time);
- to communicate with you;
- for security purposes; and
- develop our products and services.

Any communication with us (regardless of mode) is recorded and stored to assist with the operational purposes set-out above.

If at any time you no longer wish to receive any additional marketing material from us or do not want your information disclosed for direct marketing purposes, contact us using the details in section 12 and we will remove your details from our marketing database.

6. Disclosing personal information (Sharing)

We may be required to disclose your Personal Information by law, by court order or to investigate suspected fraud or other unlawful activity.

We may also disclose your Personal Information to third parties in certain circumstances including:

- if you agree to the disclosure;
- when we use it for the purpose for which it was collected, e.g., to provide you with Services;
- in circumstances where you would reasonably be expected to consent to information of that kind being passed to a third party;
- where disclosure is required or permitted by law;
- where it is required to be disclosed for audit purposes;
- to our Related Entities;
- if disclosure will prevent or lessen a serious or imminent threat to someone's life or health; or
- where it is reasonably necessary for the enforcement of the criminal law, a law imposing a pecuniary penalty or for the protection of public revenue.

When we disclose your Personal Information to our third-party service providers, we will attempt to ensure that those service providers have reasonable data security policies and practices in place.

7. Jurisdiction and Cross-Border Transfers

Due to the nature of the Services provided, your Personal Information may be stored and processed in any country where we have operations or where we engage service providers, and we may transfer your Personal Information to countries outside of your country of residence.

These countries may have different privacy and data protection rules to those of Australia and/or your country. However, we will endeavour to ensure that any such transfers comply with applicable laws and that your Personal Information remains protected.

In some circumstances, courts, law enforcement agencies, regulatory agencies or other official authorities in those countries may be entitled to access your Personal Information.

8. Considerations when you send information to us

While we do all we reasonably can to protect your Personal Information from misuse, loss, unauthorised access, modification or disclosure, including investing in security software, no data transfer over the Internet is 100% secure.

The open nature of the Internet is such that information exchanged via the Internet may be accessed and used by people other than those for whom the data is intended. If you send us any information, including (without limitation) Personal Information, it is sent at your own risk.

If you provide Personal Information to us electronically, there are steps you can take to help maintain the information's privacy. These include:

- always closing your browser when you have finished your session;
- NEVER providing Personal Information by using a public computer; and
- NEVER disclosing your username and password to another person.

You are responsible for all actions taken using your username, email or password. If at any time you believe your username or password has been compromised, you should immediately contact us and also change your password.

You should also contact us immediately if you believe:

- someone has gained access to your Personal Information;
- we have breached our privacy obligations or your privacy rights in any way; or
- you would like to discuss any issues about our Privacy Policy.

9. How your information is stored

We endeavour to keep our information systems and files secured from unauthorised access. Those who work with us, including our third-party service providers are aware of the importance we place on protecting your privacy and their role in helping us to do so.

Our procedures to securely store Personal Information include electronic and physical security measures, staff training and use of password protection software.

When the Personal Information that we collect is no longer required, we will remove or de-identify the Personal Information as soon as reasonably possible. We may, however, retain Personal Information for as long as is necessary to comply with any applicable law, for the prevention of fraud, for insurance and governance purposes, in our IT back-up, for the collection of any monies owed and to resolve disputes. There may also be residual Personal Information that will remain within our databases and other records, which will not be removed.

10. How you can update, correct, or delete your Personal Information

You may request access to your Personal Information or correct any inaccurate or out of date information by clicking contacting our Privacy Officer using the details below. For security purposes, before we provide you with personal information, we will ask you to provide evidence of your identity.

You may request the source of any information we collect from a third party. We will provide this at no cost, unless under the Privacy Act or other law there is a reason for this information being withheld.

If there is a reason under the Privacy Act or other law for us not to provide you with information, we will give you a written notice of refusal setting out the reasons for the refusal except to the extent it would be unreasonable to do so and the mechanisms available to you to complain about the refusal.

11. Changes to our Privacy Policy

This document sets out our current Privacy Policy.

Our Privacy Policy will be updated from time to time. You should review our Privacy Policy each time you visit our Website or provide us with Personal Information.

12. Further Information and Contact Details

If you would like further information on our Privacy Policy or if you have any concerns over the protection of the information you have given to us or that we have collected from others, please contact us by contacting our Privacy Officer at:

Post:

GO1 – GO2, 53 Stanley Street, Bankstown NSW 2200

Email:

admin@anate.com.au

More information about your rights and our obligations in respect to privacy and information on making a privacy complaint are available from the Office of the Australian Information Commissioner by:

Website:

www.oaic.gov.au

Post:

GPO Box 5218 Sydney NSW 2001

Email: enquiries@oaic.gov.au