

Privacy Policy

Introduction

Job Futures Ltd ABN 13 080 037538 (trading as CoAct) is committed to protecting the privacy of your personal information. CoAct makes every effort to ensure our privacy policy and procedures are in line with the Australian Privacy Principles and adhere to the requirements of the Privacy Act 1988 and the Privacy Amendment (Notifiable Data Breaches) Act 2017. This Privacy Policy explains how CoAct manages the personal information that we collect, use and disclose and how to contact us if you have any further queries about our management of your personal information.

Information collected and held by CoAct about its employees is not covered by this policy. (Covered by Employee Records Privacy Policy).

Policy

What is personal information?

Personal information is information or an opinion, in any form and whether true or not, about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. (ALRC Report 108). Examples include an individual's name, address, contact number and email address.

What information does CoAct collect and hold?

In order to service our clients, members and partners and keep all our stakeholders informed, we need to collect personal information such as (but not limited to) name, organisation, contact details, date of birth, residency, banking details, career and employment details, police and working with children checks and clearances, and any other information necessary to manage and administer our relationship with you and/or your organisation.

Why does CoAct collect personal information?

CoAct collects personal information for a range of purposes, including to:

- Provide you with general communications (e.g. newsletters) about CoAct activities and events that you have subscribed to
- Provide you with information on CoAct services, benefits and governance matters that you have requested
- Register you for CoAct events
- Manage your requested access to CoAct's business systems
- Provide you with information specific to the programs you deliver on behalf of CoAct
- Process membership applications

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- Provide information on becoming a client (job seeker) of the CoAct network
- Manage and provide information and services to the network's clients (job seekers)
- Consider your application to work with us
- Conduct research for the purposes of surveys, evaluation discussions, workshops or focus groups
- Respond to requests for tender.

From time to time, CoAct may survey you on a range of issues to identify and analyse the ongoing needs of our stakeholders and the quality of our services and interactions with you. If you do not wish to participate in these surveys, please let us know. Our contact details are provided at the end of this policy.

How does CoAct collect personal information?

- CoAct will collect personal information only by lawful and fair means and not in an unreasonably intrusive manner
- CoAct will not collect personal information about you unless that information is necessary for one or more of our business activities or functions
- CoAct will collect your personal information directly from you where it is reasonable and practicable to do so
- We only collect information about you from a third party or publicly available source where it is necessary for one or more of our business activities or functions.

Use and disclosure of personal information

We will use our best efforts to ensure that the information you provide to us remains private and is used only for the purposes you agree to and we will not sell or distribute your personal information to third parties. CoAct may, however, disclose the personal information it collects about you to third parties engaged by us to carry out, advise or assist with the carrying out of our business activities. These third parties may include our members, subcontractors, business partners, government agencies as required or authorised by law, contractors, financial institutions, payroll processing organisations, verification services, as well as any third parties that you have directly authorised to receive your personal information.

We may use your personal information to provide you information about third parties that we think you may find interesting unless you tell us that you do not wish to receive this information.

CoAct does not use or disclose your personal information for the purpose of direct marketing of unrelated products or services.

Cross border disclosures

CoAct does not disclose personal information it holds to any overseas recipients.

In order to manage our services, in connection with activities such as surveys, website analytics and email and campaign management, we use the following cloud based service providers located outside of Australia, which therefore means the data passed to them is stored and processed outside of Australia: Google Analytics, SurveyMonkey, Hootsuite and Unbounce. You can find further information in the Privacy Policies for each of these services.

How might we contact you?

We may contact you in a variety of ways, including by post, email, SMS, telephone call or facsimile. We will not send you any commercial electronic messages such as SMS or emails unless this is permitted by the Spam Act (for example, if we have your express or inferred consent to do so). Any commercial electronic message that we send will identify CoAct as the sender and will include our contact details. The message will also provide an unsubscribe facility. If you do not wish to receive commercial electronic messages from us, please let us know. Our contact details are provided at the end of this policy.

Data quality

CoAct will take reasonable steps to ensure that the personal information that we collect, use and disclose is accurate, complete and up to date. You are encouraged to help us keep your personal information accurate, complete and up to date by contacting us and informing us of any changes in your details. Our contact details are provided at the end of this policy.

Storage and data security

We are committed to ensuring your information is secure. We have put in place suitable physical, electronic and managerial procedures to reasonably secure any information collected from you from misuse, interference or loss and in order to prevent unauthorised access to, modification or disclosure of that information. We will also take reasonable steps to destroy or permanently de-identify personal information if it is no longer required for any purpose.

In the event of a data breach, such as the unauthorised loss, use or disclosure of personal information, we will assess and respond in line with our applicable policies and procedures, which incorporate the requirements contained in the Privacy Amendment (Notifiable Data Breaches) Act 2017.

Website privacy

In order to properly manage our websites and applications, we may log certain statistics about the users who visit these, for example the users' domains and browser types. This information does not specifically identify an individual and is used for statistical, reporting and website administration and maintenance purposes.

From time to time, our website may use 'cookies'. A cookie is a small piece of data sent from a website and stored in a user's web browser while the user is browsing that website. The cookie helps us to maintain the continuity of your browsing session and remember your details and preferences when you return. If you are concerned about cookies, most browsers recognise when a cookie is offered and permit you to opt out of receiving it or you can configure your web browser to reject cookies.

In addition, CoAct uses social media platforms, for example Facebook, LinkedIn, Twitter and YouTube. Any content or information you disclose on these sites may be viewed, collected and used by other users. CoAct is not responsible for the privacy practices or data collection methods used by these sites.

Anonymity or use of pseudonym

CoAct will generally provide you as an individual with the option of not identifying yourself when entering into transactions with us when it is lawful and practical to do so.

Client (job seeker) information

As both a Principal and Sub Contractor of government funded employment services, CoAct has access to client information. We deal with this information in accordance with the requirements of the relevant program deed, as well as our obligations under Privacy legislation. (See references below)

Use of Commonwealth Government identifiers

Unless expressly authorised or required under the relevant Deed/Contract, CoAct will not engage in any act or practice that would breach APP 9 (adoption, use or disclosure of government related identifiers).

Access and correction of your personal information

Please contact CoAct at the address below if you would like to access or correct the personal information that we hold about you. CoAct will provide you with access to your personal information (although a fee may be imposed) and will take reasonable steps to amend any personal information that is incorrect, unless we are legally authorised to refuse your request. In some circumstances, CoAct may not permit access to your personal information, or may refuse to correct your personal information (in accordance with the Privacy Act) in which case we will provide you with reasons for this decision.

How to make a privacy complaint

You are able to raise any concerns you may have regarding our personal information handling practices or the personal information that CoAct holds about you via the following:

Post: CoAct
PO Box K43
Haymarket NSW 2143
Attention: Privacy

Email: privacy@coact.org.au

Phone: (02) 8281 2400

Any concerns or complaints received will be dealt with under Australian Federal jurisdiction and its applicable laws.

Related Documents	
Related Processes	Data Breach Response Plan
Forms	-
Related Policies	Employee Records Privacy Policy
Deed References	<ul style="list-style-type: none"> • Chapter A3 of the jobactive Deed 2015-2020 • Sections 17-20 of the jobactive Deed 2015-2020 – Work for the Dole Coordinator • Sections 3C and 3D of the Disability Employment Services Deed • Sections 26-28 of the Deed of Standing Offer in relation to the Green Army Programme • Sections 20 and 21 of the Australian Apprenticeship Support Network Contract July 2015 • Chapter A3 of the TTW Deed 2016-2020 • Clauses 17, 20, 22, 28 & 29 of Smart, Skilled & Hired – Youth Employment Program Services Deed 2017 - 2020
Other References	Copyright Act 1968 Privacy Act 1988 Privacy Amendment (Notifiable Data Breaches) Act 2017

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