

# Privacy Policy

P011




# Privacy Policy


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Version	Date	Changes
1.0	Sep 2022	Initial document release


## Document Developer

Appointment	Name	Digital Signature
Chief Security Officer	Dave Kurts	

## Document Reviewer

Appointment	Name	Digital Signature
HR Manager	Craig Downey	

## Document Approver

Appointment	Name	Digital Signature
Managing Director	Andrew Neaves	

## Review date: Sep 24

Two years from date of approval

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The responsibility for the management of this document resides with Chief Security Officer.

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## INTRODUCTION

### Abbreviations

Table1 - Abbreviations	
APP	Australian Privacy Principles
AGSVA	Australian Government Security Vetting Agency
DISP	Defence Industry Security Program
DSPF	Defence Security Principles Framework
ISM	Information Security Manual

### References

- A. Privacy Act 1988 (Cth)
- B. Australian Privacy Principles (APP's)
- C. Information Security Manual (ISM)
- D. Defence Security Principles Framework (DSPF)
- E. Australian Privacy Principles (APP's) Guidelines
- F. Working Securely with Defence Guide
- G. P007-Allship Employment Screening Policy
- H. P009-Allship Security Policy

### Definitions

- 'Personal information' A broad range of information, or an opinion, that could identify an individual.
- 'Sensitive information' Personal information that includes information or an opinion about an individual's racial or ethnic origin, political opinions, or associations, religious or philosophical beliefs, trade union membership or associations, sexual orientation or practices, criminal record, health or genetic information, and some aspects of biometric information.
- 'Stakeholder' An individual or group that has an interest in any decision or activity of Allship Engineering.

### Document Amendments and Authorisation

1. This policy will be reviewed biennially or at any time as a direct result of changes to Allship policies, procedures, or processes. Additionally, amendments may occur because of changes to legislation that govern fair work, or findings from an audit. Reviews shall be undertaken in consultation with key stakeholders to ensure all work locations and impacts are considered. The latest approved version of this policy will be available for all employees on the cloud storage service 'OneDrive'.

### Communication of Policy

2. In the event of a new revision to the document being approved for use, a notification email will be distributed to all employees with an Allship email by the Chief Security Officer (or delegate). The Chief Security Officer is responsible for the implementation and review of the Policy and will approve new revisions of the Policy via Q001-A -Document Management Process.

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## PURPOSE

3. The purpose of this policy is to outline Allship Engineering's obligation to our employees and key stakeholders in respect of how we collect, use, and disclose Personal information. We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal information. A copy of the Australian Privacy Principles may be obtained from the Office of the Australian Information Commissioner at [www.aaic.gov.au](http://www.aaic.gov.au)

## SCOPE

4. This policy applies to Allship Engineering employees and key stakeholders.

### Personal Information

5. Personal information includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances. For example, personal information may include:

- a. An individual's name, signature, address, phone number or date of birth
- b. Sensitive information
- c. Credit information
- d. Employee record information
- e. Photographs
- f. Internet protocol (IP) addresses
- g. Voice print and facial recognition biometrics
- h. Location information from a mobile device.

### Collection of Personal Information

6. Allship Engineering collects personal information that is only reasonably necessary for the proper performance and management of our business operations and to effectively manage the employment of our staff. Allship does not require employee consent unless the information is sensitive. The types of information we collect includes:

- a. Employee, contractor personal and contract details
- b. Employment placement operations
- c. Recruitment, identity, and qualification verification
- d. Referee and emergency contact details
- e. Employment and Contractor contracts
- f. Job applications
- g. Salary, superannuation, taxation, banking details and leave records
- h. Medical certificates and health related information
- i. Information relating to training, conduct and performance
- j. Staff management
- k. Training
- l. Risk management
- m. Client and business relationship management
- n. Statistical purposes and statutory compliance requirements.

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7. Where reasonable and practicable to do so, we will collect your personal information only from you. However, in some circumstances we may provide information to third parties. Third parties may include Department of Defence, Prime Contractors, AGSVA and companies tasked with conducting Police checks and background verification activities. In such a case, we will take reasonable steps to ensure that you are made aware of the information provided to the third party.

## Use or disclosure of Personal Information

8. Allship will use or disclose personal information for the reasons it was originally collected unless an exception applies. Exceptions include where:
- a. The individual has consented to a secondary use or disclosure
  - b. The individual would reasonably expect Allship to use or disclose their personal information for a secondary purpose that is related to the primary purpose of collection, or, in the case of sensitive information, directly related to the primary purpose
  - c. The secondary use or disclosure is required or authorised by or under an Australian law or a court/tribunal order
  - d. A permitted general situation exists in relation to the secondary use or disclosure
  - e. A permitted health situation exists in relation to the secondary use or disclosure.
9. Allship staff are only permitted to use or disclose personal information that is relevant to performing their duties as described in their position description, or as directed by the Managing Director or delegate. Any privacy breach by an Allship employee of any obligation under this Policy, the Privacy Act (1988) or by the guidelines outlined within the [Working Securely with Defence Guide](#) will result in immediate cessation of positional Authorisations and potential disciplinary actions.

## Storing and Disposing of Personal Information

10. Personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification, or disclosure. Allship Engineering's ICT and cyber security protocols meet our business and contractual needs required by DISP membership. When personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information. However, most of the personal information is or will be stored in client files which will be kept by for a minimum of 7 years.

## Access to your Personal Information

11. Australian privacy law gives you a general right to access your personal information. This includes your health information. Allship Engineering must give you access to your personal information when you request it, except where the law allows us to refuse your request. You don't have a right under Australian Privacy Law to access other kinds of information. If you wish to access your personal information, please contact us in writing. To protect your personal information, we may require identification from you before releasing the requested information. When requesting information in writing you should include:
- a. Your name and contact details
  - b. The personal information you want to access
  - c. How you would like to access the information
  - d. If you authorise a person or organisation to access the personal information on your behalf.
12. Allship will respond to a request for access to personal information within 30 days.

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## Refusing a Request to Access Personal Information

13. Allship can refuse to give you access to your personal information if there is a valid reason. Examples of a valid reason include:

- a. Allship believes that giving you access may endanger the life, health, or safety of any individual, or endanger public health or safety
- b. Giving you access would have an unreasonable impact on the privacy of other individuals
- c. Your request is trivial or aggravating
- d. Your personal information is part of existing or anticipated legal proceedings between you and Allship.

## Maintaining the Quality of your Personal Information

14. It is an 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 current. If you find that the information, we hold relating to you is not up to date or is inaccurate, please advise us as soon as practicable to ensure we can continue to provide quality services to you.

## Privacy Policy Complaints and Enquiries

15. If you have any queries or complaints about our Privacy Policy, please contact us at: [admin@allship.com.au](mailto:admin@allship.com.au).

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