

Data Privacy Policy

WSUP-10-POL-HR-00006

October 2020

PURPOSE

Wave International have established guiding principles with respect to the management of Personal and Sensitive information. The principles are consistent with the Privacy Act 1988 (Cth) and are aimed to safeguard the privacy of all individuals employed by or seeking employment with Wave International.

DEFINITIONS

- **Personal information** is any information which identifies an individual, or from which the individual's identity can reasonably be ascertained. It includes an individual's name, address, telephone number, date of birth, work experience, skills and qualifications, any test results, referee contact details and other information relating to career, education and personal interests.
- **Sensitive information** is information about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientations or practices, criminal record health or genetic information.
- **Employee record** means information contained in or recorded in a record about health, training, discipline or resignation of the employee, termination of the employment of the employee, terms and conditions of employment, personal and emergency contact details, employee performance or conduct, hours of employment, salary or wages, membership of a professional or trade association, trade union of membership, recreation, long service leave, sick, personal, maternity, paternity or other leave.
- **Record** means a document, database, photograph or picture of a person, but does not include a generally available publication.
- **Confidential and personal information** may include but is not limited to personal information about a person, any information about the organisation's suppliers, customers, agents and / or contractors, any information about a prospective, current or former employee of Wave International, information regarding Wave International the organisation's systems, processes and affairs.

PURPOSE

Collection of Information

Wave International will only collect personal and sensitive information that is necessary for recruitment or the management of the employment relationship and maintain it within our employee records database. Where it is reasonable and practicable to do so, Wave International will collect personal and sensitive information about an individual from that person directly.

Applicants in any recruitment process carried out by Wave International who fail to make available lawfully requested information for the purposes of ascertaining suitability or fitness for job vacancies, may be subject to delays in their application(s) and / or may lead to their application being unsuccessful.

Wave International will endeavour to only collect personal and sensitive information by lawful and fair means and not in an unreasonably intrusive way.

Wave International will not collect sensitive information about an individual unless that person has consented, or such collection is required or authorised by law or reasonable requested for employment purposes.

If Wave International finds that information provided by any job applicant is false, or misleading in any way, their application may be unsuccessful or in the case where the person has already been employed by Wave International the person's employment may be terminated.

Use of personal information

Wave International will only use personal information contained in an employee record for the purpose of managing the employment relationship or a purpose sufficiently related to that purpose (unless the individual concerned consents to some other use).

Where practical we will only use personal information contained in a record if it is accurate, complete, and up to date. In many instances, we rely upon the persons to provide accurate and complete information and to advise us should their circumstances change over time.

Security of personal information

Wave International rely on software provided by reputable organisations not limited to Microsoft, MYOB, Bentley, JobAdder, Employment Hero and can make no guarantee on the reliability or security of data from acts such as external breaches or external hacking. In the event of a data breach, we will notify you as soon as practically possible.

Access and correction of personal information

Unless otherwise agreed or a lawful exception applies, job applicants and employees have the right to access, make copies of and correct their personal information in the possession of Wave International.

Inspection of records by employees

Employees may be granted access to view their own personal information held by Wave International in certain situations. These may include:

- Wage and overtime records;
- Leave records;
- Instruments regulating the employment relationship, including: contracts, letters of offer, the name of any industrial instrument (Modern Awards or EBA's for example);
- Superannuation records and contributions by employer on the employee's behalf; and
- Workers compensation records regarding an employee who has suffered from an accident.

In all other circumstances, employees do not have the right to access their personal information held on file by the organisation as this is an exemption under the Privacy Act 1988.

All employees of Wave International are under an obligation to preserve the privacy of customers, clients, agents, contractors, suppliers, distributors and fellow workers of Wave International. In preserving this

privacy, employees must refrain from disclosing confidential information about any of these people. This obligation extends to out of hours conduct and any breach of privacy in this regard may be subject to an investigation by Wave International or legal professionals.

Where an employee is unsure whether the information is confidential or not, they are to contact the Human Resources Dept. for clarification and advice before taking any action or disclosing information.

Where confidential and personal information is found to have been disclosed by an employee, they may be subject to a disciplinary process in accordance with the Wave International relevant policy.

Complaints and further information

All enquiries and complaints regarding this policy and procedure should be directed to the HR Department by contacting (08) 9204 0700.

This policy is periodically reviewed to ensure it is relevant, continues to reflect sound practices and meet the Company's high standards.



GREG MILLEN
Chief Executive Officer
Wave International Pty Ltd