

PANKU PTY LTD PRIVACY & CONFIDENTIALITY POLICY 2017

Panku Pty Ltd Privacy and Confidentiality Policy 2017 Panku Pty Ltd undertakes to comply with the Information Privacy Act 2000 (Vic) and is committed to maintaining the privacy and confidentiality of its personnel and client records.

Management and Collection of Personal information

Panku Pty Ltd retains a record of personal information about all individuals with whom we undertake any form of business activity in order to provide services to clients, promote our products and services conduct business activities and manage employees. We may also collect and hold information pertaining to:

- Identity details;
- Employee details & HR information;
- Complaint or issue information;
- Disability status & other individual needs;
- Background checks (such as Criminal Checks or Working with Children checks).
- Copies of licences

Personal information is usually collected directly from the individuals concerned. This may include the use of forms and the use of web based systems. Panku Pty Ltd only collects personal information that is reasonably necessary for our business activities and is by lawful and fair means. We only collect solicited information directly from the individual concerned, unless it is unreasonable or impracticable for the personal information to only be collected in this manner. Panku Pty Ltd may from time to time receive unsolicited personal information. If it is determined that the information could have been collected in the normal course of our business, we may hold, use and disclose the information appropriately as per the practices outlined here.

How personal information is held

Student information is stored by APL Group RTO 3586. Their privacy Policy can be accessed at <http://www.australianfirstaid.com.au/privacy-policy/> In order to request access to personal records, individuals are to make contact with: Panku Pty Ltd – info@heart2hearttraining.com.au. If an individual feels that Panku Pty Ltd may have committed a privacy breach they should in the first instance contact: Panku Pty Ltd – info@heart2hertraining.com.au. An individual can request access their personal information through contacting info@heart2hearttraining.com.au.

Notification of the collection of personal information

Whenever Panku Pty Ltd collects personal information about an individual, we take reasonable steps to notify the individual of the details of the information collection or otherwise ensure the individual is aware of those matters. This notification occurs at or before the time of collection, or as soon as practicable afterwards. Our notifications to individuals on data collection include:

- Panku Pty Ltd's identity and contact details, including the position title, telephone number and email address of a contact who handles enquiries and requests relating to privacy matters;
- The facts and circumstances of collection such as the date, time, place and method of collection, and whether the information was collected from a third party, including the name of that party;
- If the collection is required or authorised by law, including the name of the Australian law or other legal agreement requiring the collection;
- The purpose of collection, including any primary and secondary purposes;
- The consequences for the individual if all or some personal information is not collected;

- Other organisations or persons to which the information is usually disclosed, including naming those parties;
- Whether we are likely to disclose the personal information to overseas recipients, and if so, the names of the recipients and the countries in which such recipients are located.
- A link to this Privacy and Confidentiality Policy on our website or explain how it may be accessed; and
- Advice that this Privacy and Confidentiality Policy contains information about how the individual may access and seek correction of the personal information held by us; and how to complain about a breach, and how we will deal with such a complaint. Where possible, we ensure that the individual confirms their understanding of these details, such as through signed declarations, website form acceptance of details or in person through questioning.

Use or disclosure of personal information

Panku Pty Ltd only uses or discloses personal information it holds about an individual for the particular primary purposes for which the information was collected, or secondary purposes in cases where:

- An individual consented to a secondary use or disclosure;
- An individual would reasonably expect the secondary use or disclosure, and that is directly related to the primary purpose of collection; or
- Using or disclosing the information is required or authorised by law. If Panku Pty Ltd uses or discloses personal information in accordance with an enforcement related activity we will make a written note of the use or disclosure, including the following details:
 - The date of the use or disclosure;
 - Details of the personal information that was used or disclosed;
 - The enforcement body conducting the enforcement related activity;
 - If the organisation used the information, how the information was used by the organisation;
 - The basis for our reasonable belief that we were required to disclose the information.

Direct Marketing

Panku Pty Ltd may use or disclose the personal information that it holds about an individual for the purpose of direct marketing of products or services directly related to Panku Pty Ltd.

Cross-border disclosure of personal information

Panku Pty Ltd does not disclose personal information on clients or staff to any overseas recipient. The only contact information provided to overseas service or product providers is company email addresses, facsimile number or telephone number. Panku Pty Ltd will only disclose company contact information to overseas organisations where such contact is essential to the conduct of business and where the overseas organisation is subject to privacy laws in their own jurisdiction and have a privacy policy that forbids forwarding of company contact information to any third party.

Quality of personal information

Panku Pty Ltd takes reasonable steps to ensure that the personal information it collects is accurate, up-to-date and complete. We also take reasonable steps to ensure that the personal information we use or disclose is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant.

Security of personal information

Panku Pty Ltd takes active measures to consider whether we are able to retain personal information we hold, and also to ensure the security of personal information we hold. This includes reasonable steps to protect the information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

Correction of personal information

Panku Pty Ltd takes reasonable steps to correct personal information we hold, to ensure it is accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held. Individual

Requests