

PRIVACY POLICY

Policy Statement

The policy of Skilled Group Limited (SKILLED) and all of its subsidiary Companies in relation to PRIVACY is a commitment to the National Privacy Principles (NPP) embodied in the Privacy (Private Sector) Amendment Act 2000 ("Act").

What Is The Privacy Act

The Privacy Act came into effect on 21 December 2001. It places restrictions on the way private sector organisations (i.e. SKILLED) collect, use, disclose and store personal information about individuals. It sets out minimum standards for information handling.

Personal information means information or an opinion, whether true or not about an individual whose identity is apparent, or can reasonably be ascertained, from the information.

Privacy Issues for Resolution

It is the policy of SKILLED that all comments, clarifications and/or complaints must be forwarded in writing to:

The Privacy Officer
Skilled Group Limited
Level 15, 380 St Kilda Road
MELBOURNE VICTORIA 3004

National Privacy Principles

The Privacy Act contains 10 National Privacy Principles that need to be complied with. SKILLED has a commitment to comply with the Privacy Act and the National Privacy Principles. This commitment is contained in the following.

1. Collection Limitation

SKILLED is committed to the collection, by fair and lawful means, of only sufficient personal and sensitive information to carry out its business activities and functions
Collection of personal information from sources other than that of the individual will be with the consent of the individual.

2. Use and Disclosure

SKILLED will not use or disclose personal information (other than for the primary purpose for which it was collected and except when required by law) for a purpose not related to its business activities and functions without the documented consent of the individual.
Any disclosures required by law will only be made after consultation with the Company Secretary and will be appropriately recorded.

3. Data Quality

SKILLED will take reasonable steps to ensure that the personal information that it has collected is accurate, complete and up-to-date.

4. Data Security

SKILLED will take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure.

SKILLED will take reasonable steps to destroy or permanently de-identify personal information which is no longer required to carry out its business activities and functions.

5. Openness

This policy document will be made available to any person who asks for it.

SKILLED on request will let an individual know generally what sort of personal information it holds for that individual, for what purposes and how it collects, holds, uses and discloses that information.

6. Access and Correction

SKILLED will normally provide access to personal information that it holds about an individual provided that due notice is given and the reason for the request is reasonable and outside the restrictions set out in the legislation.

However, where there is evaluative information internally generated in connection with a commercially sensitive decision making process, SKILLED may give the individual an explanation for the commercially sensitive decision rather than direct access to the information.

In the case of restricted access (as provided for in the legislation) SKILLED will consider the use of mutually agreed intermediaries to allow sufficient access to meet the needs of both parties.

SKILLED will not charge for access unless the access involves costly archival access and retrieval.

Based on verifiable data, SKILLED undertakes to correct personal information so that it is accurate, complete and up-to-date. In the case of disagreement on the data, SKILLED will on request by the individual associate the statement claiming that the information is not accurate with the personal information in question.

SKILLED will always provide (and record) reasons for denial of access or refusal to correct personal information.

7. Identifiers

It is not the policy of SKILLED to use the identifiers for individuals used by government, other agencies or service providers.

8. Anonymity

Wherever it is lawful and practicable, individuals have the option of not identifying themselves when entering transactions with SKILLED.

9. Transborder Data Flows

SKILLED will only transfer personal information to another party in another country where it will be for the benefit of the individual. SKILLED will always endeavour to obtain the consent of the individual and will take reasonable steps to ensure that the information will not be held, used or disclosed by the recipient inconsistently with the National Privacy Principles.

10. Sensitive Information

SKILLED will only collect sensitive information in accordance with the legislation.

Privacy Officer

The Company Secretary will act as the Privacy Officer for the purposes of this Policy and the Act.

Example of Personal Information:

Examples of Personal Information collected by SKILLED and which are subject to the Privacy Act include:

- Clients: this includes information about clients who are individuals (eg: as provided on credit application forms) and also about staff, etc, who work for the client (eg: key contact information and personal details that may be collected as part of our relationship management).
- Suppliers: includes information about suppliers who are individuals and also about staff, etc, who work for the supplier (eg: key contacts information and personal details that may be collected as part of our relationship management).
- Contractors and subcontractors: includes information about individuals who:
 - perform work for SKILLED on a fee for service basis, eg: Communications Division contractors;
 - perform work for SKILLED on a time based arrangement, eg: retained for a specific project or task;
 - individuals (who are not employees) that are on-hired to clients.
- Shareholders: information about shareholders who are individuals, eg: tax file numbers and bank account details.
- Job Applicants: information collected as part of the job application / recruitment process. This includes job application forms, general correspondence, interview notes, reference check material, attribute and skill type test input and output reports (eg: Salas reports).

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APPROVED BY: Company Secretary
Skilled Group Limited