



## PRIVACY AND PERSONAL INFORMATION POLICY

Anvara is committed to protecting the privacy of the personal information it collects and receives. Anvara is required to comply with the Australian Privacy Principles as detailed within the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Privacy Act).

The Privacy & Personal Information Policy details how Anvara collects, uses, discloses and handles personal information relating to individuals. It also explains how you can access and correct the personal information we hold about you, or how you can lodge a complaint about any suspected breach to this Policy.

### DEFINITIONS

- Personal information - refers to information which can be used to identify an individual. It can include an individual's name, address, telephone number, date of birth, work experience, skills/qualifications, any test results, referee contact details and other information relating to career, education and personal interests.
- Sensitive information - refers to information about an individual's health, racial or ethnic origin, political or religious beliefs, opinions, membership of a political association, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientations or practices or criminal record.
- Employment record - refers to information relating to the employment of the employee or former employee. This may include information on health, training, discipline, resignation, termination, terms and conditions of employment, personal and emergency contact details, performance or conduct, hours of employment, salary or wages, taxation, superannuation or banking details, memberships and leave records.
- Confidential information - may include (but is not limited to) personal information about a person, information about Anvara suppliers, customers, agents and/or contractors, any information about a prospective, current or former employee of Anvara, information regarding Anvara's systems, processes and affairs.
- Record - means a document, database, photograph or picture, but does not include a publication which is generally available.
- Relevant purpose - refers to the purpose related to the person's employment, interaction or engagement with Anvara whether it be prospective, current or retrospective (examples include recruitment, training, counselling or engagement of services).



## **COLLECTION OF PERSONAL INFORMATION**

Anvara only collects personal information that it needs for a relevant purpose. Anvara will only record personal information on employment records that is necessary for the recruitment or management of the employment relationship going forward.

Where practicable, Anvara will collect personal information about an individual from that person directly and by lawful and fair means. If Anvara collects personal information from third parties, we will endeavour to advise you of that information to give you an opportunity to validate the information collected.

Applicants who apply for a role with Anvara and who fail to provide lawfully requested information for the purposes of assessing suitability for job vacancies, may not progress through the recruitment process. If information provided by an applicant is false or misleading, their application may be excluded from the recruitment process, or if the person is already employed with Anvara, the person's employment may be terminated.

Anvara will not collect sensitive information about an individual unless that person has consented, or such collection is required or authorised by law.

## **USE OF PERSONAL INFORMATION**

Anvara will only use personal information contained in an employee record for the purpose of managing the employment relationship (unless the individual concerned consents to some other use).

Where practical, we will only use personal information contained in a record if it is complete and up-to-date. It is your responsibility to ensure that your details are kept accurate and advise us of any changes.

Anvara will not disclose a person's sensitive information without the person's consent, unless there is a need to disclose such information in accordance with any legislation.

Where unsuccessful job applicants request that their application be kept by Anvara for future consideration for other employment opportunities, they will be required to provide their written consent to the Human Resources Manager so that this information may be retained on file.

## **SECURITY OF PERSONAL INFORMATION**

Records of personal information about an individual will be stored during the term of the employment relationship and for an additional 7 years after termination. Anvara will take all reasonable steps to keep records of personal information secure and will securely destroy personal information when it is no longer required.



## **ACCESS & CORRECTION OF PERSONAL INFORMATION**

Unless a lawful exception applies, job applicants and employees have the right to access, make copies of (at their own expense) and correct any personal information that Anvara retains.

Employees may be granted access to view their own personal information where the request relates to:

- basic employment details (employment terms, wages, overtime records, hours worked, deductions etc);
- leave entitlements and leave records;
- instruments regulating the employment relationship (contracts, letters of offer, names of Awards etc);
- superannuation records and contributions; and
- workers compensation records.

Anvara will provide an employee with access to these records within 5 business days of the request being received in writing by our Human Resources Personnel. Alternatively, a copy can be posted to the employee or former employee within 14 days. Any costs associated with such requests will be the responsibility of the employee requesting the records.

All other employment records are exempt from the Privacy Act and may not be made available to employees.

Under no circumstance will an employee be granted access to another employees' personal information held by Anvara unless the access is by a manager of the employee concerned and is required for the ongoing management of the employment relationship

## **EMPLOYEE RESPONSIBILITIES**

Employees are not permitted to disclose confidential or personal information which is collected by Anvara about its suppliers, customers, agents, contractors or fellow employees. This obligation extends to out-of-hours conduct. Where an employee is unsure whether the information is confidential or not, they are to contact the Human Resources Manager for clarification and advice before taking any action or disclosing information.

Where confidential or personal information is found to have been disclosed by an employee, they may be subject to disciplinary action. To lodge a complaint about a potential breach to this Policy, contact your Supervisor or the Human Resources Manager. The complaint will be managed in accordance with Anvara's Performance Management Procedure.



# ANVARA

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## **FURTHER INFORMATION**

This Policy covers all employees of Anvara and anyone performing work at the direction of or on behalf of Anvara. Anyone who breaches this Policy may be subjected to disciplinary action including termination of employment agreements for serious or repeated breaches.

For assistance with the interpretation and application of this Policy, please refer to the Human Resources Manager.

**Anvara reserves the right to amend this Policy as required.**