

**Apprenticeships
Are Us**



PRIVACY POLICY

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Apprenticeships Are Us Limited (ARU) provides various services including recruitment and Placement of Apprentices and Trainees with participating Host Businesses in the automotive industry.

THE PURPOSE OF THIS POLICY

As a Registered Group Training Organisation (GTO), *Apprenticeships Are Us Ltd* is required to comply with the *National Standards for Group Training Organisations*. These standards require GTOs to ensure the protection and appropriate use of personal information in managing the apprenticeships and traineeships under our care. This policy ensures that ARU adheres to *National Standard 1 – Effective Governance* and *National Standard 3 – Risk Management* by maintaining privacy practices that protect all stakeholders involved.

As a registered charity with the *Australian Charities and Not-for-profits Commission (ACNC)*, ARU complies with the *ACNC Governance Standards*. These standards require transparency and accountability in all of ARU's operations, including the collection, use, and protection of personal information. This policy ensures that ARU aligns with the ACNC's standards for ethical management and proper disclosure of personal information.

This policy also complies with the *Corporations Act 2001 (Cth)*, which outlines the responsibilities of directors, officers, and organisations to ensure the proper governance and management of personal information. By adhering to this Act, ARU ensures that the handling of personal data is ethical, secure, and in the best interests of the organisation.

We are bound by the Privacy Act and the Australian Privacy Principles (APPs) which regulate the collection, use and disclosure of personal information.

This Privacy Policy explains:

1. the scope of our Privacy Policy;
2. why we collect personal information;
3. what personal information we collect;
4. how we collect and use your personal information;
5. how we disclose your personal information, including to overseas recipients;
6. your right to access your personal information;
7. your right to correct your personal information;
8. how we protect the integrity of your personal information;
9. your right to make a privacy complaint; and
10. how you can contact us regarding privacy concerns.

We reserve the right to review, and if necessary, change this Privacy Policy. We will post changes to this Privacy Policy on our website.

SCOPE

This Privacy Policy governs all personal information collected by and provided to us and must be adhered to by all persons who access, use, process, control or otherwise deal with personal information on our behalf. This policy applies to independent contractors and job applicants, as well as individuals who provide us with their personal information.

INTERPRETATION AND DEFINITIONS

Personal pronouns, except where the context otherwise provides or requires:

- the terms we, us or our refers to Apprenticeships Are Us Limited and its Affiliated Entities (as appropriate); and
- the terms you or yours refers to any person who provides us with personal information, whether via the website or otherwise.

Defined terms: In this Privacy Policy unless otherwise provided, the following terms shall have their meaning as specified.

Affiliated Entities means the Apprenticeships Are Us Limited affiliates, subsidiaries, associated entities and relevant partners as the case may be or the context requires from time to time.

Collection Notice means the notification statement that is called a Collection Notice and can be found at the following link www.apprus.com.au.

Privacy Act means the Privacy Act 1988 (Cth) as amended.

Privacy Policy means this privacy policy as amended.

Website means www.apprus.com.au and that of its Affiliate Entities including its sub-domains (as appropriate).

Terms italicized and defined in the Privacy Act have the meaning given to them in the Privacy Act.

WHAT IS PERSONAL INFORMATION?

Personal information includes any data that can identify an individual, such as name, address, and contact information. This policy also extends to the management of sensitive information, as defined under the *Privacy Act 1988*, which includes health, financial, racial, or ethnic data, as well as any other sensitive details that may affect the individual's privacy. ARU is committed to handling all personal and sensitive information in accordance with the relevant Australian privacy laws.

Sensitive information is a special category of personal information and includes, but is not limited to, information about your health, race or ethnic origin, political or religious beliefs, membership of a trade union or association, or criminal record. Health information includes personal information collected from you in order to provide a health service. There are greater restrictions that apply to our collection, storage, use and disclosure of sensitive information under the Privacy Act.

WHY DO WE COLLECT PERSONAL INFORMATION?

We collect personal information from you for the following purposes (Primary Purpose):

- to organise your work placement;
- for performance appraisals;
- to assess your ongoing performance and prospects;
- for testing or assessment purposes including medical tests and assessments where required;
- to identify your training needs;
- for workplace rehabilitation;
- managing complaints, investigations or inquiries;
- for insurance claims or proposals that require personal or sensitive information;
- information required for the Department of Education and Communities registrations for Australian

Apprenticeships;

- for information to provide to your Host Business;
- to lawfully carry out our functions and activities;
- to deliver the products and services that you requested;
- to provide you with further information about the products and services you requested;
- to personalise and customise your experiences with us;
- to help us review, manage and enhance our products and services;
- to communicate with you;
- for administration purposes, including charging, billing and collecting debts;
- to promote and market those of our other products and services which we consider may be of interest to you;
- when considering making offers to job applicants and prospective employees or for employment purposes; and
- to receive services from you or the organisation which employs you.

In addition to the Primary Purpose, we may use the personal information we collect, and you consent to us using your personal information to:

- communicate with you, including by email, telephone and mail;
- manage and enhance products or your experience on our website and domains;
- verify your identity;
- investigate any complaints about, or made by you, or if we have reason to suspect you have breached any relevant terms and conditions; and
- as required or permitted by any law.

Unless otherwise provided by law, we will not collect, hold, use or disclose sensitive information without your consent.

WHAT PERSONAL INFORMATION DO WE COLLECT?

The nature and extent of personal information we collect varies depending on your particular interaction with us and the nature of our functions and activities.

Personal information that we commonly collect from you would include (but is not limited to):

- your name, position, date of birth;
- your address, email address, telephone numbers, gender, driver's license number;
- your financial information including banking information, tax file number, superannuation details;
- your career history and references;
- your academic results from current or past studies; and
- We also collect information that is not personal information, such as data relating to your activity on our website.

If you feel that the personal information we are requesting, at any point, is not information that you wish to provide, please feel free to raise this with us.

HOW DO WE COLLECT PERSONAL INFORMATION?

Generally, personal information is collected by us from a variety of sources, including government departments, Registered Training Organisations, when dealing with individuals, undertaking marketing initiatives, or when

recruiting.

Personal information may be provided by you using our website or by telephone, business cards, contracts, applications, competition entries, survey entries, mail or email, registration forms, face-to-face or in writing, whether verbally, in hardcopy or electronic format.

Where possible, we collect your personal information directly from you. In some circumstances, we may obtain personal information from a third party.

If you provide personal information about another person to us, we require that you inform that person you have done so with and provide them with a copy of this Privacy Policy and the Collection Notice.

If we receive unsolicited personal information about you that we could not have collected in accordance with this Privacy Policy and the Privacy Act, we will, within a reasonable period, destroy or de-identify such information received.

MAINTAINING PERSONAL INFORMATION

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 up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

HOLDING PERSONAL INFORMATION

ARU will ensure that personal information is only held for as long as it is needed to fulfill the purpose for which it was collected, in accordance with the *Privacy Act 1988*. Once the information is no longer needed, it will be securely disposed of or de-identified in line with legal requirements to protect the privacy of individuals.

We hold personal information in both hard copy and electronic formats. In some cases, we engage third parties to host electronic data (including data in relation to the services we provide) on our behalf. We take security measures to protect the personal information we hold which includes physical controls (for example, security passes to enter our offices and storage of physical records in lockable cabinets) as well as technological controls (for example, restriction of access, firewalls, the use of encryption, passwords and digital certificates). We also have policies and processes which govern document retention and data breach incidents. We endeavour to ensure that personal information is kept as current as possible, and that irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable. However, some personal information may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

PURPOSE FOR COLLECTING, HOLDING, USING AND DISCLOSING PERSONAL INFORMATION

ARU will only collect, hold, use, and disclose personal information with the informed consent of the individual, in compliance with the *ACNC Governance Standards* and *Privacy Act 1988*. Transparency in the management of personal data is essential to upholding public trust and maintaining ARU's standing as a registered charity.

We will only use your information if we have a lawful reason to do so such as when it's our legal duty if we have your consent and when it's in our legitimate interest to do so. Reasons include:

- To provide our services to you or to our Host Business or Apprentice in accordance with the terms of any Host Business Agreement or Apprentice Contract of Employment including any related reasons such as

payroll, tax, superannuation and providing necessary information in order to register and employee's apprenticeship in the relevant jurisdiction they are working or reside.

- To provide, improve and properly manage our services in line with the standards for Nationally Registered Group Training Organization's including:
 - requests or queries,
 - verifying your identity,
 - to conduct surveys, and
 - seeking your feedback.
- To maintain contact with our Host Businesses, apprentices and relevant government stakeholders, and keep them informed of our services, industry developments, seminars and other events.
- For administrative purposes, including:
 - processing payment transactions,
 - charging and billing,
 - detecting or preventing fraud, and
 - identifying breaches of our terms and conditions of engagement.
- For purposes relating to the employment of our Host Businesses, apprentices and other personnel including:
 - recruitment purposes such as pre-employment screening, contacting referees, processing applications, assessment for suitability, background checks and ongoing analytic purposes such as ensuring we are reaching a diverse range of candidates for apprentices and Host Businesses to engage our apprentices and/or candidates.
- For governance and compliance purposes including:
 - managing any quality, conduct or risk management issues including conflict of interest or independence (including auditor independence) obligations or situations,
 - meeting regulatory obligations, and
 - where we are required to or authorised by legislation, direction or standard to do so.
 - In line with the *Corporations Act 2001 (Cth)*, ARU will ensure that all personal information is governed and managed in a way that aligns with its corporate responsibilities. Directors and officers are responsible for the oversight of data security measures to prevent any misuse, loss, or unauthorized access to personal information.
- For development and analytics purposes to develop our expertise and know how, including:
 - for benchmarking purposes,
 - development, analytics, and business intelligence functions including web site trend and performance analysis,
 - quality assurance and thought leadership, and
 - other purposes related to our business.

We may also use non-personal, de-identified and aggregated information for several purposes including for data analytics, research, submissions, thought leadership and promotional purposes. Any output is anonymised or aggregated so that no personal information or information relating specifically to you is reasonably identifiable.

Apprenticeship Are Us Limited may also use your personal information for the purpose of marketing its services to you. This may include products, services and offers provided by our alliance partners. If you do not want to receive marketing material from us, you can contact us as detailed below.

WEBSITE AND GOOGLE ANALYTICS

Information we collect may include:

- the internet protocol address and a component of the domain name used (e.g. .com or .net);

- the type of browser and operating system you used;
- the date and time you visited our website;
- the web pages or services you accessed at our website;
- the time spent on individual pages and our website overall;
- which files you downloaded; and
- information about your computer and internet connections using cookies.

We use Google analytics demographics and interest reports to obtain a more detailed understanding of our website users and their potential needs. We do not collect personal information by such methods; only aggregate data is used for planning purposes.

VISITING OUR WEBSITE AND ONLINE

AUTOMATIC COLLECTION OF PERSONAL INFORMATION

Together with our service providers we use cookies, web beacons and other technologies on some of our websites and through email to automatically collect certain types of information. The collection of this information allows us to customise and personalise your online experience (including tailoring our online presence) and enhancing your future online experience. We may also use this information for development and analytics purposes. You can tailor your experience with these technologies via the privacy and browser settings on your device or by rejecting the associated cookies.

ANALYTICS TOOLS

We use analytics tools, such as Google Analytics and Adobe Analytics. To provide website visitors with more choice on how their data is collected by Google Analytics, Google have developed the Google Analytics Opt-out Browser Add-on. More information about how we use Google Analytics can be found at <https://www.google.com/analytics/terms/us.html>.

Adobe also provides a range of opt-out options for Adobe Analytics.

SOCIAL MEDIA WIDGETS AND APPLICATIONS

Some of our websites and services may include functionality to enable information sharing via third party social media applications, such as the Facebook Like button and Twitter widget. These social media applications may collect and use information regarding your use of our websites. Any personal information that you provide via such social media applications may be collected and used by members of that social media application separate to us and are subject to the privacy policies of the relevant companies that provide the applications. We do not have control over, or responsibility for, those companies or their use of your information.

Any personal information that you provide on any Apprenticeships Are Us Limited social media feature may be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we may have limited or no control.

HOW DO WE USE YOUR PERSONAL INFORMATION?

We will only use and disclose your personal information:

- for purposes which are related to the Primary Purpose; or
- if we otherwise get your consent to do so, in accordance with this Privacy Policy and the Privacy Act.

For purposes which are related to the Primary Purpose, we are required to use and disclose your personal information to the following organisations:

- potential and actual Host Businesses and clients of Apprenticeships Are Us Limited;
- referees;
- Apprenticeships Are Us Limited insurers;
- a government department (associated with apprentices and trainees), profession association or registration body that has a proper interest in the disclosure of your personal information;
- a workers' compensation authority;
- contractors and suppliers for example, IT contractors and database designers;
- Australian Apprenticeship Centre;
- Federal and State Government Departments who are required to receive information for the processing and recording of apprenticeship and trainee details; and
- an appropriate Registered Training Organisation.

We will not use your personal information for any purpose for which you would not reasonably expect us to use your personal information. Additionally, we will not disclose your sensitive information without your consent, unless there is a need to disclose such information in accordance with the Privacy Act or to comply with any other regulatory requirement.

We will only use or disclose your personal information for the purposes of direct marketing if:

- we collected the information from you;
- it is reasonable in the circumstances to expect that we would use or disclose the information for direct marketing purposes;
- we provide you with a simple means to 'opt-out' of direct marketing communications from us; and
- you have not elected to 'opt-out' from receiving such direct marketing communications from us.

You may opt out of receiving such communications by:

- clicking a link on the email communications sent to you;
- contacting our Privacy Officer; or
- writing to us at Suite 4.01, Level 4, 1 Wentworth Street, Parramatta NSW 2150.

WHAT HAPPENS IF YOU CHOOSE NOT TO PROVIDE YOUR PERSONAL INFORMATION?

You are not obliged to give us your personal information. If you would like to access any of our services on an anonymous basis or using a pseudonym, we will take reasonable steps to comply with your request. However, we will require you to identify yourself if:

- we are required by law to deal with individuals who have identified themselves; or
- it is impracticable for us to deal with you if you do not identify yourself or elect to use a pseudonym.

Please also be aware that your request to be anonymous or to use a pseudonym may affect our ability to provide you with the requested goods and/or services. For example, we may not be able to progress a job application if you do not provide your personal information.

WHEN DO WE DISCLOSE YOUR PERSONAL INFORMATION?

For the purposes referred to above in this Privacy Policy, you acknowledge and agree that we may disclose personal information, and you consent to us disclosing such personal information to:

- our Affiliated Entities;
- third parties engaged by us to perform functions or provide products or services on our or their behalf, such as mail outs;
- for job applicants, your referees and former employers;
- our professional advisors, including our accountants, auditors and lawyers;
- persons authorised by you to receive information held by us; and
- any persons as required or permitted by law.

DO WE SEND INFORMATION OVERSEAS?

Please note we do not send information overseas.

ACCESS TO YOUR PERSONAL INFORMATION

ARU will comply with any requests for access to personal information, as required under the *Privacy Act 1988* and *Corporations Act 2001 (Cth)*. Individuals have the right to access and request corrections to their personal information, and ARU will respond to these requests in a timely manner, ensuring that the information provided is accurate and up to date.

If you require access to your personal information, please contact our Privacy Officer. You are required to put your request in writing and provide proof of your identity.

We are not obliged to allow access to your personal information if:

- we reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- giving access would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings between you and us and would not ordinarily be accessible by the discovery process in such proceedings;
- giving access would reveal our intentions in relation to negotiations with you in a way that would prejudice those negotiations;
- giving access would be unlawful;
- denying access is required or authorised by or under an Australian law or a court/tribunal order;
- we have reason to suspect that unlawful activity, or misconduct of a serious nature relating to our functions or activities has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
- giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- giving access would reveal internal evaluative information in connection with a commercially sensitive decision-making process.

If you make a request for access to personal information, we will:

- respond to your request within a reasonable period; and
- if reasonable and practicable, give access to the information in the manner requested.

If we refuse to give access to the personal information, we will give you a written notice that sets out at a minimum:

- (a) our reasons for the refusal (to the extent it is reasonable to do so); and

(b) the mechanisms available to complain about the refusal.

We reserve the right to charge you reasonable expenses for providing access to personal information, for example, a fee for photocopying any information requested by you.

Nothing in this Privacy Policy replaces other informal or legal procedures by which you can be provided with access to personal information.

CORRECTION OF YOUR PERSONAL INFORMATION

We request that you keep your personal information as current as possible. If you feel that information about you is not accurate or your details have or are about to change, you can call us on (02) 9891 6900 and we will correct or update your personal information; or

If you make a request to correct your personal information, we will:

- respond to your request within a reasonable period; and
- if reasonable and practicable, correct the information in the manner requested.

If we refuse a request to correct personal information, we will:

- give you a written notice setting out the reasons for the refusal and how you may make a complaint; and
- take reasonable steps to include a statement with your personal information as to why we refuse to correct it.

We reserve the right to charge you reasonable expenses for making a correction to your personal information, for example, a fee for photocopying relevant information.

Nothing in this Privacy Policy replaces other informal or legal procedures by which you can correct personal information.

INTEGRITY OF YOUR PERSONAL INFORMATION

We will take reasonable steps to:

- ensure that the personal information that we collect is accurate, up to date and complete;
- ensure that the personal information that we hold, use or disclose is, with regard to the relevant purpose, accurate, up to date, complete and relevant; and
- secure your personal information while it is being held by us.

We will take reasonable steps to protect personal information from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

Electronic information is protected by various security measures (including encryption and password protection) and physical paper files are stored in a secure location. Personal information is de-identified where appropriate. Data protection includes the use of password access areas and secure servers.

You acknowledge that the security of communications sent by electronic means or by post cannot be guaranteed. We cannot accept responsibility for misuse, loss or unauthorised access to your personal information where the security of information is not within our control. If you suspect any misuse or loss of your personal information, please contact us immediately.

We will take reasonable steps to destroy or de-identify any personal information held by us if we no longer need to hold the information for the purpose it was collected, and we are not otherwise required by law to retain the

information.

In line with *National Standard 3 – Risk Management* for GTOs, ARU will implement appropriate risk management strategies to protect personal information from unauthorized access, misuse, or breaches. This includes regular reviews of our data security measures and the adoption of technological safeguards, such as encryption and password protection, to prevent data breaches.

COMPLAINTS

If you have a complaint about how we collect, use, disclose, manage or protect your personal information, or otherwise consider there may be a breach of the Privacy Act or the APPs, please contact us in writing.

We treat all complaints seriously and intend to resolve your complaint within a reasonable timeframe, usually 14 days or otherwise as soon as practicable. However, in some complex cases, resolution may take longer.

Once the complaint has been received, we will try to resolve the matter in a number of ways:

- **Request for further information:** We may request further information from you. You should be prepared to provide us with as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and determine an appropriate solution. All details provided will be kept confidential.
- **Discuss options:** We will discuss options for resolution with you and if you have suggestions about how the matter might be resolved you should raise these with our Privacy Officer.
- **Investigation:** Where necessary, the complaint will be investigated. We will try to do so within a reasonable time frame. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.
- **Conduct of our employees:** If your complaint involves the conduct of our employees, we will raise the matter with the employees concerned and seek their comment and input in the resolution of the complaint.

Any complaints related to the management of personal information will be treated seriously and addressed within a reasonable timeframe, in line with *ACNC Governance Standards* and the *Privacy Act 1988*. ARU is committed to resolving complaints in a transparent manner and ensuring that any issues identified are rectified to maintain the trust of our stakeholders.

CHILDREN

We understand the importance of protecting the privacy of children, especially in an online environment. In particular, our websites, products and services are not intentionally designed for, or directed at, children under the age of 13.

It is our policy to never knowingly collect or maintain information about any person under the age of 13, except as part of a specific engagement to provide services which necessitates such personal information be collected, for example, for the purposes of ensuring compliance with our auditor independence policies, or as otherwise required by law. Apprenticeships Are Us Limited also has a Child Safety Policy and Procedures that affirms our position with regards to child protection.

CONTACT

Please forward all correspondence in respect of this Privacy Policy as follows:

Apprenticeships Are Us Limited

Suite 4.01, Level 4, 1 Wentworth Street

Parramatta NSW 2150

P: (02) 9891 6900

E: info@apprus.com.au

AUTHORISATION

Michael Wentworth



Managing Director

Apprenticeships Are Us Limited

DOCUMENT CONTROL

Version	Authorised by	Authorisation Date	Sections	Amendment
1.1	M. Wentworth	01/02/2022	All	Change of CEO
1.2	M. Wentworth	10/10/2022	All	Cover page
1.3	M. Wentworth	10/10/2023	All	Cover page, information update
1.4	M. Wentworth	31/10/2024	All	Information update