



DATA PRIVACY POLICY

Updated on: January 2025

This Data Privacy Policy defines PIL Australia's principles and practices followed to protect personal information collected from users. By adhering to applicable data protection laws, the policy ensures transparency, accountability, and trust in how personal data is handled and safeguarded.

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1. Introduction

PIL Australia is committed to protecting your privacy and ensuring the security of your personal data. We continuously implement and enhance security measures to protect the personal information we collect, whether through your access to publicly available content on our website or through interactions with our team for commercial purposes.

This Data Privacy Policy explains how we collect, protect, and manage your personal information. It also provides guidance on how you can request, update, or delete the data we hold. We reserve the right to modify or update this policy at our discretion, and any changes will be reflected here.

Please note that this policy is in addition to any other terms and conditions applicable to our website. We do not accept responsibility for the privacy practices of third-party websites that may be linked to our site.

This policy is designed to comply with your privacy rights under the Privacy Act 1988 (Cth). By using our website, you consent to the terms outlined in this Policy.

2. Definitions

Company: PIL Australia Pty Ltd.

Cookies and Applets: Technologies used to enhance user experience and monitor site usage, including small text files stored on users' devices and software applications embedded within webpages.

Credit Card Details: Information provided by users for the purpose of processing payments on the website, including credit card number, expiration date, and security code.

Disclosure: The act of sharing personal information with third parties, as outlined in this Internet Privacy Policy, including instances where consent is obtained, or disclosure is necessary to fulfill legal obligations.

IP Address: A unique numerical label assigned to each device connected to a computer network, used for communication and identification purposes.

Registered Members: Individuals who have completed the registration process on the website and provided personal information to access enhanced services.

Registration: The voluntary process through which users provide personal details to create an account on the website, enabling access to additional features and services.

Security Measures: Procedures and protocols implemented to protect the confidentiality, integrity, and privacy of personal information submitted through the website, including encryption, firewalls, and access controls.

Website: Denotes the online platform owned and operated by the company, accessible via the internet and through which users may interact and provide personal information.

3. Guidelines

3.1. Personal Information

Personal information refers to the information that can identify individuals. Examples may be names, address, email addresses, phone numbers, IP addresses etc. We collect the same by a number of methods including and not limited to:

- Your access of our website,
- Email,
- Telephone,
- Online forms,
- Online / manual / external recruitment services,
- Conversations.

3.2. Third Parties

Where reasonable and practicable to do so, we will collect personal information only from you. In certain cases, we will collect information via third parties such as, and not limited to:

- Your current or previous employer,
- Personal and professional references,
- Medical organisations,
- Third party companies such as recruitment agencies, law enforcement authorities etc.

3.3. Disclosure / Use of Information

Personal information that visitors submit to our site is used only for the purpose for which it is submitted or for such other secondary purposes that are related to the primary purpose unless we disclose other uses in this Data Privacy Policy or at the time of collection.

Copies of correspondence sent from the website, that may contain personal information, are stored as archives for record-keeping and back-up purposes only.

Such information as Credit Card Details is only stored for the processing of payments and will be deleted once payment has been processed.

Your information may be disclosed to our employees, related corporate entities, contractors or sub – contractors and service providers, for the purpose of delivering business services to our customers.

Your information may also be disclosed to:

- Third party organisations providing services to the Company such as IT software providers, financial institutions, couriers, data entry service providers.
- Professional advisors such as legal counsel, accountants, business advisors, consultants.
- Any organization for any authorized purpose with your express consent.

3.4. International Transfers

The Company has outsourced certain administrative processes to entities which are based in India, Sri Lanka, Philippines and Singapore, which are not subject to Australia jurisdiction. Due to this, personal information may be transferred to these entities for the purpose of providing business services to our clients. The data that is transferred is still under the effective control of and secured by the Company and its bodies corporate (As described in the definition previously).

While these countries may not have privacy laws that conform to Australian regulations, we continue to take all necessary steps to ensure that personal information is treated securely and in accordance with all applicable data protection laws.

3.5. Security of Personal Information

We strive to ensure the security, integrity and privacy of personal information submitted to our sites, and we review and update our security measures in light of the latest technologies. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure.

However, we will endeavour to take all reasonable steps to protect the personal information you may transmit to us or from our online products and services. Once we do receive your transmission, we will also make our best efforts to ensure its security on our systems.

In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us. However, we will not be held responsible for events arising from unauthorised access to your personal information.

3.6. Data Breaches

Data breaches are possible when personal information we possess is lost or subjected to unauthorised access or disclosure.

As per the Notifiable Data Breaches scheme (NDB) of the Privacy Act (1988) and our [Data-Breach-Response-Plan](#), the Company will notify affected individuals and the OAIC in the event of a data breach, and personal information being disclosed without authorization. The Company will take all reasonable and practical measures to contact individuals whose personal information is involved. We will also report any breach of data to the OAIC.

3.7. Access to your Personal Information

You may access the personal information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

3.8. Maintaining the Quality of your Personal Information

The Company will take reasonable steps as necessary, to ensure that 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 possible to update our records and ensure we can continue to provide quality services to you.

3.9. Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy, please contact us at:

- Address: Level 1, 102 Dodds Street, Southbank, VIC 3006
- Email Address: itdept@ilm.com.au
- Phone Number: +613 9611 6860

4. Policy Responsibilities

This policy will be reviewed and approved by the Chief Information Officer (CIO).

5. Monitoring and Review

The IT Systems Manager is responsible for reviewing this policy annually, or more frequently if changes arise that require an amendment. In such cases, the policy must be updated and submitted to the Chief Information Officer for review and approval.

6. Accessibility to this Policy

This Data Privacy Policy will be made accessible to all employees, executive directors, contractors, and any person or organization representing the Company, including suppliers, in the course of their activities. The policy will be accessible through the following means:

- It will be published on the Company's Intranet and website for easy access.
- Upon implementation, the policy will be communicated to all employees, contractors, and relevant stakeholders.

By making the policy widely available and easily accessible, we ensure that all individuals involved with the Company understand and adhere to our data privacy practices.

7. Training and Awareness

The Company will provide training and communication related to this policy to all employees, contractors, and affiliates of the Company to ensure understanding and compliance.

8. Related Legislation, Policies and Documentation

8.1. Legislation

- Privacy Act 1988 (Cth) - Australia
- Privacy Act 2020 – New Zealand

8.2. Other Relevant Documents

- [Data-Management-&-Retention-Policy](#)
- [Data-Backup-Policy](#)
- [Data-Breach-Response-Plan](#)
- Cookies Policy
- <https://www.oaic.gov.au/privacy/notifiable-data-breaches>