

# AMA GROUP

## Privacy Policy

### 1. Introduction

AMA Group Limited, and its controlled entities recognises the importance of protecting the privacy of all our stakeholders and our ongoing obligations in respect to how we manage personal information.

AMA Group Limited and its controlled entities will be referred to as “AMA”, “we”, “us” or “our” within this Privacy Policy (Policy).

### 2. Purpose

This Policy explains how we manage personal information and also describes the sorts of information we hold and why, as well as how that information is collected, held, used, disclosed and disposed of.

### 3. Policy Statement

AMA is committed to protecting the privacy rights of all stakeholders.

AMA is subject to the Privacy Act 1988 (Cth) (Privacy Act) and handles the personal information that it collects and holds in accordance with the Australian Privacy Principles (APPs) contained in the Privacy Act.

### 4. What is Personal or Sensitive Information?

Personal Information is information or an opinion that identifies an individual. The personal information we collect will depend on how you interact with us, and examples include:

- name, address (postal and email) and telephone numbers;
- gender, date of birth, marital status, occupation, country of birth, next of kin;
- recruitment information such as tax file number, employment history, work visa and other information to verify your identity and right to work;
- payment information such as credit card details; and
- other information needed to provide services.

Sensitive information is personal information that is given a higher level of protection by privacy laws. It includes information about an individual's race or ethnic origin, political opinions, membership of a political, professional or trade associations or trade unions, religious beliefs, criminal record or health information.

In this Policy, when we talk about personal information, we include sensitive information.

### 5. Dealing with us Anonymously

Where it is lawful and practicable to do so, individuals may deal with us anonymously or by using a pseudonym (e.g. when inquiring about services generally). However if individuals wish to make a booking for our services, the service will require the provision of personal identifying information.

## 6. Our Website

Visitors to our website do not disclose information unless they provide such information through an enquiry form. When individuals visit our website anonymously, non-personal information may be collected including but not limited to browser type, version and language, operating system, pages viewed while browsing the site, page access times and referring website address. This collected information is used solely internally for the purpose of gauging visitor traffic, trends and delivering personalised content to individuals while they are at this site.

## 7. Why do we Collect, Use and Disclose Personal Information?

We collect your personal information for the primary purpose of:

- understanding your requirements and providing our services to you;
- providing information to our clients and marketing;
- identifying you and conducting appropriate checks;
- recruitment, training and developing our employees;
- managing complaints and disputes, and reporting to dispute resolution bodies; or
- satisfying specific legal or regulatory obligations.

We may also use your personal information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure, or for other purposes required or authorised by or under law, including purposes for which you have provided your express or implied consent.

If you do not provide personal information requested of you to AMA, we may be unable to provide you with the products and services you request of us.

If you provide your email address, telephone and/or mobile phone number, you also consent to AMA using your email address, telephone and/or mobile phone number to contact you (including by telephone call, SMS or email) for any of the above purposes.

## 8. How do we Collect Personal Information

Where reasonable and practicable to do so, we will collect your personal information only from you. However, in some circumstances we may be provided with information by third parties. In such cases, we will protect it as set out in this Privacy Policy.

## 9. COVID-19 Vaccination

If you are employed in a role that requires you to be fully vaccinated against COVID-19 by a relevant Public Health Order, you must provide evidence of your vaccination records to your Manager or HR representative (as appropriate). You may be required to provide an “online immunisation history statement” or a “COVID-19 digital certificate from the Australian Immunisation register”. The information you provide will be stored in accordance with the relevant Public Health Order.

## 10. Overseas Disclosure

We will send your personal information overseas and collect personal information from overseas, including when:

- you have asked us to do so or we have your consent;
- we are authorised or required by law or a court/tribunal to do so;
- we have outsourced a business activity or function to an overseas service provider; or

- we undertake certain electronic transactions.

In addition, our websites may be hosted by servers outside Australia and we may also use technical support services that are based off shore. This means that technically speaking, individuals' personal information may travel electronically from Australia to another country and back to Australia. When sending information offshore, we ensure all providers we engage can and will observe the requirements of the APPs.

## 11. Storing of Personal Information

We may store personal information in different ways, including in paper and electronic form. The security of personal and information is important to us and we take all reasonable steps to protect it from misuse or loss and from unauthorised access, modification or disclosure. We ensure compliance with the Notifiable Data Breaches Scheme established under the Privacy Act.

Some of the ways we do this include:

- requiring our staff and contractors to maintain confidentiality and observe privacy laws to ensure compliance with the APPs;
- implementing document storage security;
- imposing security measures for access to computer systems; and
- only allowing access to personal information where the individual seeking access to their own information has satisfied identification requirements.

Personal information is retained for the period of time determined by law and is disposed in a secure manner.

## 12. Maintaining the Quality of Your Personal Information

We take all reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. However, the accuracy of that information depends largely on the quality of the information provided to us.

We therefore suggest that individuals:

- let us know if there are any errors in personal information; and
- keep us up to date with changes to personal information (e.g. their name and address).

Individuals may do this by mail or email (see Contact Us below).

## 13. Accessing Personal Information

Individuals have a right to access their personal information and can contact us to request access. In order to protect your personal information we may require identification from you before releasing the requested information.

We will disclose individual's personal information to an individual's authorised representatives only where written authority has been provided or where evidence has been provided that nominated individuals can act on an individual's behalf. We cannot provide an authorised representative with access to an individual's personal information unless they can demonstrate that they have the individual's consent or have legal authority to do so.

## 14. Complaints

Individuals who believe that we have breached their privacy rights in any way or wish to discuss any issues about our Policy, should contact us on the details below so that we can try to satisfy any questions and correct any errors on our part.

However, if you are unhappy with our response, you have the right to make a complaint to the Privacy Commissioner on telephone number 1300 363 992 or in writing to:

Office of the Australian Information Commission  
GPO Box 5218  
Sydney NSW 2001

## 15. Contact Us

Please contact us if you would like to seek access to or request that we correct the personal information we hold about you:

- By mail: AMA Group Privacy Officer, Level 13, 484 St Kilda Road, Melbourne VIC 3004
- By email: [companysecretary@amagroupltd.com](mailto:companysecretary@amagroupltd.com)

## 16. Further Information

If individuals would like more information about privacy in general, please refer to the Office of the Australian Information Commissioner's website [www.oaic.gov.au](http://www.oaic.gov.au).

## 17. Variations

AMA reserves the right to vary, replace or terminate this Policy from time to time. To obtain a copy of the latest version at any time you should visit our website at [www.amagroupltd.com](http://www.amagroupltd.com) or contact the Privacy Officer as above.

<b>Version</b>	V1 - 2022	<b>Effective Date</b>	January 2022
<b>Approved By</b>	AMA Group CEO	<b>Maintained By</b>	Company Secretariat