



C Smart International Privacy Policy

Overview

C Smart International (C Smart) is committed to protecting the privacy of individuals, in all aspects of our dealings, across all operational areas of our business.

All employees and independent contractors (staff) are obligated under the Privacy Act and must therefore be alert to potential conflicts.

This includes C Smart consulting staff working with our clients when accessing data and information that is owned and/or managed by the client.

Procedures

Our approach to privacy encompasses:

1. complying with privacy law, including the National Privacy Principles set out in the Privacy Amendment (Private Sector) Act 2000 (Cth);
2. adhering to established norms of client confidentiality;
3. protecting and maintaining the privacy of C Smart staff in the course of the employment relationship.

All C Smart staff are obliged to comply with privacy laws and this policy.

Consent to Hold Information

Where we need consent as a requirement of the Act and the National Privacy Principles, prior to collecting, using or disclosing personal information, we will inform the affected party of the following:

- what we wish to do with the information;
- the purpose of collecting the information; and
- any other relevant matter.

We will not seek wider consent than what we need to fulfil the stated purpose and activity of collecting, using or disclosing the information.



Information We Collect

Generally, we will not collect sensitive information as defined under the Act. If we do, we will make the individual aware of the purpose of such collection and obtain consent to do so.

For business development purposes we will not normally collect personal information other than an individual's name, address, contact information, and a history of business development activities which the individual has participated.

We will not collect personal information unless it is necessary for our activities or functions.

We will not collect personal information in an unfair or intrusive manner.

Individuals are to be made aware of their rights of access to personal information held by C Smart and the purposes for which the information is collected.

Purposes for Collecting Personal Information

C Smart will collect personal information, as defined under the Act, only as necessary to:

1. conduct our business-as-usual consulting and recruitment activities
2. business development activities for clients and potential clients
3. the general operation of the business including employment of staff.

Wherever we use personal information for a purpose other than the primary purpose of collection, we will only use or disclose the information if the primary and secondary purposes are related and the individual would have a reasonable expectation that we would use the information or disclose it for the secondary purpose or if we obtained the consent of the individual to do so.

Security of Personal Information

All staff are obliged to maintain in strict confidence personal information obtained in the course of their employment with C Smart.

All such information remains at all times the property of C Smart and is not, except as required in the normal course of employment duties, to be removed, copied or reproduced in any form without the prior consent of the Managing Director or Chief Security Officer.

The firm uses a combination of measures including physical barriers, role-based security, access technology and administrative controls to exclude unauthorised intruders from gaining access to information. All staff are obliged to ensure that security measures are adhered to and maintained.

Breaches in security should be reported to the Managing Director or Chief Security Officer.



Individuals' Access and Correction Rights

C Smart will allow individuals the ability to review personal information which the firm holds about them, provided that access does not infringe any legal obligations the firm may hold in relation to the information or other persons.

C Smart will respond to requests for access as soon as possible and will acknowledge the request within 14 days and deal with it within 30 days at the latest.

Use of Government Identifiers

C Smart will not use government identifiers such as tax file numbers or medicare numbers as a means of identifying a person.

Privacy Officer

C Smart has appointed a Privacy Officer and all questions, complaints and requests should be referred to them in the first instance.

Contact details of the Privacy Officer are available at the end of this document below.

Links

C Smart Personnel Manual

Independent Contractor Agreement

C Smart Website

Privacy Officer Contact Details

Sharnie Holani
Operations Manager
+61 2 8244 0004 ext 1105
sholani@csmartinternational.com



Approved

Signature  Date 6/10/2021
BDC92A8D4F77463...

Matthew Holani
Managing Director, C Smart International

Review History	
Date of Review	Action Taken
August 2005	Initial draft of Privacy Policy in line with Privacy Act, published in Personnel Manual under Information and Communications.
January 2020	Addition of Privacy Policy to Personnel Manual in line with Privacy Act and Fair Work Australia guidelines.
October 2021	Creation of separate Privacy Policy.