



Privacy and Confidentiality Policy

Inovayt Pty Ltd and Inovayt Wealth Pty Ltd ("Inovayt") are committed to protecting the private and confidential information of its employees, clients and any others with whom we deal. We will not disclose any personal or confidential information except in accordance with the law and this policy.

All employees must not engage in any conduct that breaches this policy. Any conduct that is in breach of this policy could result in disciplinary action.

This policy applies to all employees. All employees must make sure their conduct during and because of their employment whether at the workplace or away from it, including face to face, phone and electronic dealings with clients and third parties is consistent with the policies of Inovayt.

The policy applies during work time and may apply to activities outside of work time where those activities are associated with work or employment, such as at work related events and travel, conferences and social functions.

As far as this policy provides any obligations on Inovayt, those obligations are not contractual and do not give rise to any contractual rights. If this policy states any benefits or entitlements, they are discretionary only and are not contractual. Your written employment agreement provides the contractual terms and conditions that apply to your employment.

Inovayt may introduce, vary, remove or replace our policies and procedures at any time within our complete discretion.

Privacy

Personal information may be collected during the recruitment process and throughout your employment with Inovayt.

All confidential information will be used for legitimate purposes in accordance with the Australian Privacy Act (1988) and the Australian Privacy Principles.

Personal information

Personal information is defined as that which identifies or could reasonably identify an individual. Examples of personal information that we may collect include but is not limited to:

- Name, address, telephone number and date of birth.

- Bank account details.
- Medical records.
- Professional qualifications.
- Past employment, residency status and proof of identity.
- Terms and conditions of your employment.
- Salary and wages.
- Leave entitlements.
- Taxation, banking and superannuation details.
- Your performance or conduct records.
- How we collect personal information

Inovayt may collect personal information from you directly or from a person nominated by you with your consent. This may include third party providers. Information will only be gathered either directly or indirectly with your consent and only by lawful and fair means.

What we do with personal information

Inovayt will collect, hold, use and disclose personal information in ways people would reasonably expect and where it is only reasonably necessary for our business, including:

- Assessment of initial employment application.
- Employee performance management.
- Maintenance of company records including payroll and HR files.
- Communication with employees (and employee's emergency contacts in necessary)
- Provision of employee access to internal information communication technology and similar ICT infrastructure.
- Other Inovayt administrative purposes.

Accessing and changing your personal information

Employees have a right to access and update their personal information when necessary. Employees should contact their manager or one of the Directors, so access can be granted.

Security of your personal information

Inovayt will take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure.

All employees are responsible for the appropriate handling of their own personal information (in relation to their own personal information and those they may have access to) and to prevent unlawful disclosure.

If an employee has reason to believe their privacy has been breached or compromised, they should raise this

concern with one of the Directors immediately.

Confidentiality

Employees of Inovayt must not disclose any of Inovayt's confidential information relating to the business, employees, clients or suppliers of Inovayt except in any of the following circumstances:

- the disclosure is required by law or by a government agency
- the disclosure is necessary in connection with performing obligations
- the disclosure is reasonably made to a professional legal advisor
- the information is generally known or available by publication, commercial use or otherwise;
- is already known by you at the time of disclosure to you; or
- Inovayt consents in writing to the disclosure.

Confidential information

During your employment you may become acquainted with or have access to confidential information. You must ensure the confidentiality of this information and prevent its unauthorised disclosure to or use by any other person.

Confidential information includes (but is not limited to):

- Information or an opinion about racial or ethnic origin
- political opinions
- religious beliefs
- philosophical beliefs
- membership of a trade union
- sexual preferences
- criminal record
- health information or genetic information

Disciplinary action

All employees of Inovayt must comply with this policy. Any breach of this policy will be treated as a serious matter and may result in disciplinary action including termination of employment.

Other disciplinary action that may be taken includes, but is not limited to, issuing a formal warning, directing people to attend mandatory training, suspension from the workplace and/or permanently or temporarily denying access to all or part of Inovayt's confidential information.

Further information

If you have questions or require further information, please contact your manager or (if it is not appropriate to contact your manager or they are unavailable) another manager at Inovayt.

OTHER POLICIES

Employees and staff are encouraged to read this policy in conjunction with other relevant Inovayt policies, including:

- Code of Conduct Policy
- Workplace Health and Safety Policy
- Workplace Surveillance Policy (NSW)
- Telephone, Mobile & Internet Policy

Commercial In Confidence

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