

PRIVACY POLICY

Owner: Privacy Officer

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1. Purpose

To describe the principles that Fitted for Work (FFW) will apply when dealing with Personal Information.

2. Policy Application

This is a FFW governance - internal and external policy.

Requests and complaints regarding privacy can be submitted via email at privacy@fittedforwork.org or PO BOX 63, Richmond, Vic, 3121. We undertake to respond within 30 days. If the request or complaint will take longer to resolve, we will provide a date by which we expect to respond.

This Policy applies to:

Workforce	Contractors	Suppliers	Consultants
✓	✓	✓	✓

3. Definitions

Committee means a group formed as a sub-committee of the Board to undertake specific delegated tasks under an approved terms of reference

Consultant means an external consultant engaged with Fitted for Work.

Contractor means a person or firm that undertakes to provide materials or services to Fitted for Work.

Employee means those working for Fitted for Work on a paid basis, via payroll, and under an employment contract, either full time, part time or casual and either permanent or fixed term.

Non-Executive Directors means a member of the Board of Directors of Fitted for Work or a sub-Committee member.

Personal Information means any information or an opinion about an individual who can be reasonably identified from that information or opinion, such as a person's name, date of birth and phone number.

Sensitive Personal Information means a subset of Personal Information and includes Health Information and information about an individual's political opinions and religious or philosophical beliefs.

Health Information means Personal Information about an individual's health, disability, injury or illness.

Volunteer means a person engaged by FFW to provide time and skills to FFW without receiving any financial compensation in return, including Non-Executive Directors.

Workforce means Employees and Volunteers.

4. Policy Principles and Context

FFW is bound by the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs). This policy explains how and why FFW collects, uses, holds and discloses Personal Information.

5. Collection

Fitted for Work collects a range of Personal Information (including Sensitive Personal Information) depending on the services it provides. Across all functions, FFW may collect:

- information that identifies people who interact with FFW, such as name and date of birth;
- contact information (e.g. email, address or phone number); and
- images of people including surveillance footage of public areas in and around places where FFW provides services or operates programs.

In addition to the above, specifically for each function, FFW may collect:

- Retail services – details of services that FFW provides to a retail customer (including for The Conscious Closet Loyalty Program); and financial or banking information.
- Fundraising initiatives, donations or philanthropy – information about a person's donations and contributions to FFW; financial or banking information; information about communication preferences.
- Job readiness services – pronouns; citizenship/visa/right to work details; gender diversity status; details of emergency contacts; Sensitive Personal Information including information about someone's health, ethnic origin and main spoken language; employment information (e.g. CVs, skills etc); information about how a person engages with FFW and their personal circumstances to allow FFW to provide services to that person;
- Volunteering opportunities and programs – recruitment information (e.g. CV, references); Health Information (e.g. medical certificates where relevant); emergency contact information; and compliance screening checks (e.g. police checks).
- Marketing activities – information about a person's preferences regarding fundraising and events.
- Manage the FFW Workforce – recruitment information (e.g. CV, references); Health Information (e.g. medical certificates where relevant); and compliance screening checks (e.g. police checks).

FFW may collect Personal Information directly from someone FFW engages with, from third parties including a family member, partner organisations, social media platforms,

suppliers who provide services to FFW (including recruitment agencies, IT platform providers, police and working with children check providers, marketing or fundraising agencies).

If a person does not provide Personal Information to FFW, FFW may not be able to provide that person with FFW services, communicate with that person, or respond to enquiries.

Fitted for Work will:

- Only collect Personal Information that is necessary for the performance and function of Fitted for Work.
- Collect Personal Information only by lawful and fair means and not in an unreasonably intrusive way.
- Provide individuals with a collection notice when FFW collects Personal Information.
- Collect Personal Information from the person themselves wherever possible.
- If collecting Personal Information from a third party, be able to advise the person whom the Personal Information concerns, from whom their Personal Information has been collected.
- Collect Sensitive Personal Information only with the person's consent or if required by law or if such collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any individual, where the individual whom the information concerns:
 - is physically or legally incapable of giving consent to the collection; or
 - physically cannot communicate consent to the collection.
- Collect Health Information about an individual if:
 - the information is necessary to provide services to the individual; and
 - the information is collected as required or authorised by or under law and in accordance with rules established by competent health or medical bodies that deal with obligations of professional confidentiality which bind the organisation.
- take reasonable steps to ensure the Personal Information Fitted for Work collects is accurate, complete, up to date, and relevant to the functions FFW performs.

6. How is Personal Information Held?

Fitted for Work stores Personal Information in computer systems and databases operated by either FFW or FFW's external service providers. Some Personal Information may be recorded in paper files which FFW stores securely.

Fitted for Work implements and maintains processes to ensure that Personal Information which it holds is protected from misuse, loss, unauthorized access, interference,

unauthorized modification or disclosure in accordance with Fitted for Work's Cyber and Data Policy and Procedure.

Personal Information is stored in the cloud, hosted in Australia in secure, government accredited facilities. To help protect the privacy of data and Personal Information FFW collects and holds, FFW maintains physical, technology-based and administrative safeguards. FFW updates and tests security technology on an ongoing basis.

FFW will also take reasonable steps to destroy or deidentify Personal Information once it no longer requires it for the purposes for which it was collected or for any secondary purpose under the APPs.

7. Use and Disclosure (Including Overseas Disclosures)

FFW holds and uses Personal Information for the following purposes:

- deliver retail services – when people enquire about FFW's products, programs or services, receive or pay for products or services, answer queries from customers, inform customers about their purchases of FFW products and services.
- fundraising initiatives, collect donations or philanthropy – when people engage in FFW's fundraising activities (such as via raffle), make a donation or pledge (including via a will).
- provide job readiness services – to verify identity; answer queries or communicate with recipients of job readiness services; provide recipients with information about job readiness services; assess recipients' eligibility for FFW services; and take action in response to health and wellbeing concerns for recipients;
- manage FFW's volunteering opportunities and programs – including managing the volunteering relationship, or to process applications, contact people about volunteering opportunities;
- conduct marketing activities – to promote and communicate FFW initiatives through direct marketing, events, competitions, public relations activities and social media;
- manage the FFW Workforce – including when managing the employment relationship

FFW may also use collected Personal Information to meet professional and legal obligations, receive feedback and complaints, perform research to improve the way FFW delivers services; to third parties that provide services to FFW (including technology service providers, social media platforms and professional marketing and fundraising organisations who provide FFW with services such as digital marketing, fundraising and data analysis).

Fitted for Work will:

- Only use or disclose Personal Information for the primary purpose for which it was collected or a directly related secondary purpose.

- For other uses, Fitted for Work will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
 - o a secondary purpose is related to the primary purpose (or for Sensitive Personal Information, directly related) and the individual would reasonably have expected us to use it for purposes; or
 - o the person has consented; or
 - o certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- Fitted for Work will ensure that any Personal Information is stored securely in Australia, or, if an overseas server is used, that the providers of services are subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially like the Australian Privacy Principles;
- If FFW discloses any Personal Information to overseas recipients, then FFW will take reasonable steps to ensure that the entity handles the Personal Information in accordance with Australian privacy laws. Some IT systems and applications used by FFW are hosted overseas (including US, Europe).
- If Sensitive Personal Information is necessary for research, or the compilation or analysis of statistics, relevant to public health or public safety or to satisfy a contractual obligation to a donor organisation, the information will be de-identified to ensure anonymity is maintained.
- Fitted for Work may disclose Personal Information to others, where it is required to do so by law, where an individual has expressly consented to the disclosure or consent may be reasonably inferred from the circumstances, or FFW is otherwise permitted to do so under the Privacy Act.

8. Website and Analytics

To improve the experience on FFW's website, FFW may use 'cookies'. A cookie is a small text file that our site may place on a computer as a tool to remember user preferences. A website user may refuse the use of cookies by selecting the appropriate settings on a browser, however, if that occurs the full functionality of the FFW website may not be usable.

The FFW website may contain links to other websites. FFW is not responsible for the privacy practices of such other sites. A user should be aware and read other sites' privacy policies.

The FFW website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate IP addresses with any other data held by Google. FFW uses reports provided by Google Analytics to help FFW understand website traffic and webpage usage.

By using the FFW website, a user consents to the processing of data about that user by Google in the manner described in Google's Privacy Policy- external site and for the purposes set out above. A user can opt out of Google Analytics if they disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google- external site.

Fitted for Work also uses interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If a user chooses to "like" or "share" information from this website through these services, they should review the privacy policy of that service. If a user is a member of a social media site, the interfaces may allow the social media site to connect user visits to this site with other Personal Information.

As technology continues to evolve, FFW will continue to monitor and apply best practice.

9. Marketing Communications

By providing Personal Information to FFW, a person consents to being contacted by FFW to promote and communicate FFW's services and fundraising events or opportunities through direct marketing, events and competitions, public relations activities and social media. FFW may contact a person via email, phone, mail, social media or SMS.

A person may opt out of receiving marketing communications at any time by following the opt out instructions provided in the communication or by emailing **privacy@fittedforwork.org** or calling 1800 418 532.

In relation to Personal Information which has been collected from a third party, FFW will only use the Personal Information for direct marketing if the person whose Personal Information has been collected has consented.

10. Data Security and Retention

Fitted for Work will:

- destroy records in accordance with Fitted for Work's Cyber and Data Policy and Procedure.
- Handle data breaches in accordance with Fitted for Work's Cyber and Data Policy and Procedure and the Cyber Incident Response Plan.

11. Destruction and de-identification

Fitted For Work will:

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information FFW holds and will not use any government related identifiers unless they are reasonably necessary for FFW's functions.

12. Access and Correction

An individual has a right to seek access to their Personal Information held about them and to request correction of their Personal Information if it is inaccurate, incomplete, misleading or not up to date by contacting Fitted for Work via privacy@fittedforwork.org.

If Fitted for Work denies a request to correct an individual's Personal Information, FFW will provide its reasons for this in writing.

Fitted for Work will not charge for making a reasonable request for Personal Information, correcting the Personal Information, except that may require a person requesting this to meet Fitted for Work's reasonable costs in providing access (such as photocopying costs or costs for time spent on collating large amounts of material)..Fitted for Work will respond to requests for access to or correction of Personal Information in a reasonable time and will take all reasonable steps to ensure that the Personal Information it holds remains accurate, up to date and complete.

13. Identifiers

Fitted for Work will not adopt as its own any government related identifiers of an individual. Fitted for Work will only collect, use or disclose government-related identifiers (such as tax file numbers, drivers' licences, director IDs, passport numbers etc) where this is reasonably necessary for FFW's functions or activities and as permitted by law.

FFW will take reasonable steps to ensure that any government-related identifiers it holds are handled securely, only used for authorised purposes and not disclosed unless permitted or required by law.

14. Anonymity

Where possible and practical, Fitted for Work will allow people from whom the Personal Information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis. If anonymity or use of a pseudonym is elected, Fitted for Work may not be able to provide services or opportunities because Fitted for Work will not be able to verify someone's identity.

15. Making information available to other organisations

FFW can release information to third parties where it is requested, in writing by the person concerned.

16. Breach of Policy

Failure to comply with this policy may result in disciplinary action, up to and including dismissal.

17. Policy Amendment

This policy can only be amended by the Policy Owner and recommended by the Governance Committee for approval by the Board.

18. Related Documents, Policies and Procedures

- Fundraising, Sponsorship and Grants Policy
- Cyber and Data Policy and Procedure
- IP and Confidentiality Policy
- Cyber Incident Response Plan

19. Legislation and Industrial Instruments

This policy and/or procedure is not intended to override any industrial instrument, contract, award or legislation. Those (known) relevant to this policy are the [Privacy Act 1988 \(Cth\)– external site](#), including the [Australian Privacy Principles- external site](#).

20. Revision History

Version	Approved by	Effective date	Sections modified
1.0	Board	2 June 2021	This is a new Policy
2.0	Board	Feb 2024	Updates to access to information by third parties and additions to the external extracts for the website
3.0	Board	January 2026	Full review for compliance with Privacy Act and updated to reflect processes at FFW including: updated definitions to reflect Australian Privacy Principles and latest FFW organisational structure; removed contents and updated style to reflect latest FFW policy style (font and formatting); updated application of policy to reflect updated definitions; simplified

policy principles; updated collection to describe Personal Information collected across the business and then specifically as collected by each business segment; updated use and disclosure to describe how Personal Information is used and disclosed across the business and then specifically by each business segment (including overseas disclosures); removed parts that restated the APPs; rearranged order of document to reflect order of APPs; updated section on identifiers to reflect FFW processes; separated out and updated Collection Notice to reflect the APPs.

Collection Notice

Fitted for Work Ltd

ABN: 78 126 256 862

Address: 483-485 Bridge Road, Richmond VIC, 3121

Contact: privacy@fittedforwork.org

Website: <https://fittedforwork.org/>

1. Collection of your personal information

We collect personal information about you when you fill out our forms, apply for a job, use our website, contact us, or interact with our services. We may also collect information about you from third parties including including a family member, partner organisations, social media platforms, suppliers who provide services to FFW (including recruitment agencies, IT platform providers, police and working with children check providers, marketing or fundraising agencies).

2. Purpose of collection

We collect your personal information for one or more of the following purposes:

- Deliver retail services;
- Run fundraising initiatives or collect donations;
- Provide job readiness services;
- Manage our volunteer programs or initiatives;
- Conduct marketing activities;
- Manage the workforce; or
- To meet our legal and regulatory obligations.

We may also use your personal information for related secondary purposes that you would reasonably expect, or for which we have obtained your consent.

3. If you do not provide your information

If you choose not to provide requested personal information, we may not be able to provide you with the services or programs for which you have engaged with us.

4. Disclosures of personal information

We may disclose your personal information to:

- Our related entities;
- Third-party service providers (e.g., IT providers, payment processors, analytics services);
- Professional advisers;
- Government agencies where required or authorised by law.

5. Overseas disclosures

We do not disclose personal information to overseas recipients, however if we do so, then we will take reasonable steps to ensure that the entity handles the Personal Information in accordance with Australian privacy laws.

6. Our privacy policy

Our privacy policy includes information about how you may access or correct your personal information, how you can make a complaint, and how we handle complaints. You can access our privacy policy at: [To be included]

7. Contact us

If you have any questions about this collection statement or how your personal information is handled, you can contact us at:
privacy@fittedforwork.org