

PROJECT:						<b>Corporate</b>					
DOCUMENT No:						<b>COR-HRE-POL-009</b>					
DOCUMENT TITLE:						<b>Privacy Policy</b>					
7	24.09.2024	Issued for Use		A.Tokaji	S.Miles	J.Keogh					
7A	24.09.2024	Issued for Review		A.Tokaji	S.Miles	J.Keogh					
6	16/05/23	Issued for use		F.Sammels	S.Miles	J.Keogh					
6A	16/05/23	Issued for review		F.Sammels	S.Miles	J.Keogh					
5	12/08/20	Issued for use		F.Sammels	J.Keogh	J.Keogh					
4a	03/08/2020	Issued for review		F.Sammels	J.Keogh	J.Keogh					
4	06/05/19	Issued for use		S. Breen	N. Vij	N. Vij					
3A	06/05/19	Issued for review		S. Breen	N. Vij	N. Vij					
3	25/05/17	Issued for use		R. Kimov	N. Vij	N. Vij					
2A	25/05/17	Issued for review		R. Kimov	N. Vij	N. Vij					
2	23/02/16	Issued for use		Legal	N. Vij	N. Vij					
<b>REVISION</b>	<b>DATE</b>	<b>DESCRIPTION OF REVISION</b>		<b>ORIGINATOR</b>	<b>CHECKED</b>	<b>APPROVED</b>					

Document No:	Title:	Created By	Modified By:	Approved By:	Revision No.	Revision Date:	Review Date:
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## 1. Purpose

Parabellum International Pty Ltd and its related bodies corporate (together, Parabellum) believe privacy is an important right of individuals. We take steps to protect your personal information from misuse and to use your information only in the ways described in this Privacy Policy and in accordance with the *Privacy Act 1988 (Cth)* (the Privacy Act).

This Privacy Policy does not apply to personal information collected, or otherwise obtained, by Parabellum in relation to current and former employees and which relates directly to the employment relationship that exists, or existed, between Parabellum and its current and former employees. Terms used in this Privacy Policy have the same meaning as those in the Privacy Act.

## 2. Scope

This Policy applies to Parabellum International Pty Ltd.

## 3. Open and Transparent Management of Personal Information

We make our Privacy Policy available on our website: [www.parabellum.com.au](http://www.parabellum.com.au) We can also provide a hard copy version of this policy upon request by contacting us via:

- phone: (08) 9285 6100;
- e-mail: [info@parabellum.com.au](mailto:info@parabellum.com.au); or
- post: The Privacy Officer, 50 Tacoma Circuit Canning Vale WA 6155

## 4. Personal Information

Personal information means information or an opinion about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. The personal information which we collect, store, use and disclose may include:

- your name;
- your contact details (including emergency contact details);
- employment history;
- your banking details (including your tax file number);
- educational and trade qualifications; and
- certain other details such as your date of birth, gender and occupation.

Some personal information is considered 'sensitive information' for the purposes of the Privacy Act. The sensitive information which we collect, store, use and may disclose includes information or an opinion about an individual's:

- health;
- membership of a professional or trade association;
- membership of a trade union;
- sexual orientation or practices; or
- criminal record.

## 5. Anonymity and Pseudonymity

In most circumstances, it is impractical for people to communicate with us anonymously. We need to identify you to assist you effectively. However, in circumstances where it is lawful and practicable to do so, we will provide you with the option of not identifying yourself, or using a pseudonym, when entering into communications with us.

## 6. Collection of Solicited Personal Information

We only collect personal information by lawful and fair means where reasonably necessary for our business functions or activities as a provider of (amongst other things) emergency response and medical services to the mining and oil and gas industries. We collect personal information which:

- you provide in the course of applying for employment positions at Parabellum;
- is provided to us by third parties who have disclosed that information to us with your consent (and only if it would be unreasonable or impracticable to collect the information directly from you);
- you provide to us in the course of updating or changing your details;
- is contained in documents or correspondence you provide to us;

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- you or a third party provides in the course of Parabellum International providing services for or on behalf of that third party (for example, in connection with medical services provided by Parabellum which may involve you);
- you provide to us in person, by phone, by post, via our website or via other forms of electronic communication (including social media);
- you provide via interviews, correspondence, telephone, fax, media, publications and from other publicly available sources.

Subject to certain exceptions under the Privacy Act, we only collect sensitive information about you if you consent to the collection of the information and the information is reasonably necessary for one or more of Parabellum's functions or activities.

The provision of sensitive information to Parabellum International on a voluntary basis (including, for example, information you supply when applying for a position with Parabellum International) will be taken to be by your consent for this purpose. In all cases, we will take reasonable steps in all relevant circumstances to tell you why we are collecting your personal information and how it may be used at the time of collection.

We also utilise 'cookies' which enable us to monitor traffic patterns and to serve you more efficiently if you revisit our website. A cookie does not identify you personally but it does identify your computer. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance. If you reject a cookie, some of the parts or features of the website may not function in their entirety.

## 7. Collection of Unsolicited Personal Information

From time to time, we may receive unsolicited personal information about you. Unsolicited personal information is information we may receive from you which is not in response to a request by us for that information. Where we receive unsolicited personal information about you (either directly from you or from a third party), we will consider, within a reasonable period, whether we could have collected that personal information from you had the personal information been solicited.

Where we determine that we could have collected the unsolicited personal information had it been solicited, we will store, use and disclose that personal information in the manner set out in this Privacy Policy.

Where we determine that we could not have collected the unsolicited personal information had it been solicited, we will destroy or de-identify that unsolicited personal information as soon as practicable, provided it is lawful and reasonable to do so.

## 8. Use or Disclosure of Personal Information

Parabellum may collect, store (in hard copy or electronic form), use or disclose your personal information for the primary purpose of conducting and supporting its business activities as a provider of (amongst other things) emergency response and medical services to the mining and oil and gas industries.

We may also collect, store, use or disclose your personal information:

- in relation to your application for employment;
- to contact you should we need to;
- to address any enquiries, complaints or feedback from you; or
- to do anything Parabellum is required or authorised by law to do.

Further, we may disclose your personal information to:

- third parties where you have given your consent (express or implied);
- government agencies or other similar entities as required or authorised by law; and
- our professional advisors, contractors or other service providers whom Parabellum International may engage from time to time to carry out, advise or assist with the carrying out of the business activities of Parabellum International.

Parabellum International will not use your personal information for a secondary purpose unless:

- you consent to the use or disclosure of your information or you would reasonably expect us to use it for a secondary purpose which is related to the primary purpose;
- the use or disclosure is required or authorised by law;

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- the use or disclosure is otherwise permitted by the Privacy Act (for example, as a necessary part of an investigation of suspected unlawful activity); or
- in the case of sensitive information, you consent to the use of the information or you would reasonably expect us to use it for a secondary purpose which is directly related to the primary purpose.

Information about you collected by Parabellum International in the course of providing medical services to you for or on behalf of a third party who has contracted Parabellum to provide those services may be provided to that third party in a de-identified form.

#### **9. Collection, Storage, Use and Disclosure During Emergencies**

Parabellum International provides emergency response, medical, risk management and training services for and on behalf of third parties who have contracted Parabellum International to provide those services. During the course of providing those services, Parabellum International may collect, use and/or disclosure personal information (including sensitive information) about you.

Due to the urgency of the situation, the circumstances in which Parabellum International collects, uses and/or discloses your personal information (including sensitive information) may be such that it is unreasonable and impracticable to obtain your consent prior to the collection, use or disclosure because the collection, use or disclosure is necessary to lessen or prevent a serious threat to your life, health or safety, or to that of others.

Where your personal information is collected in the circumstances described above, we may disclose your personal information (including sensitive information) to:

- the third party who has contracted Parabellum International to provide emergency services;
- professional services personnel (such a doctors) who assume responsibility for your care following the provision of services by Parabellum which involves you;
- employees and directors of Parabellum International;
- any agents, contractors and advisors engaged by Parabellum International who promise to keep the information confidential and in accordance with the Privacy Act; and
- any other person or entity as may be required to do so by law.

Your personal information is stored on a secure electronic data management system encrypted by password access codes by authorised staff, and is stored per the legal requirements under the Privacy Act.

#### **10. Cross-Border Disclosure of Personal Information**

Parabellum International does not send your personal information to third parties located overseas.

#### **11. Adoption, Use or Disclosure of Government Related Identifiers**

Where we collect your personal information, it will usually be identified by a common identifier, such as your name, address or contact details. Subject to certain exceptions under the Privacy Act, Parabellum International will not disclose identifiers assigned by Government agencies or its agents, such as Medicare and tax file numbers, or use those identifiers to identify your personal information.

#### **12. Security of Personal Information**

We will take reasonable steps to protect your data from misuse, interference and loss, and from unauthorised access, modification or disclosure. Parabellum also commits to taking reasonable steps to destroy or permanently de-identify personal information which is no longer needed for the purposes described in this Privacy Policy.

#### **13. Access to Personal Information**

Subject to any exceptions in the Privacy Act, if you have provided us with personal information, you have a right to request access to it. If you are of the belief that Parabellum holds personal information relating to you and you wish to obtain access to this information, please contact us on the details provided above. We may ask you to provide proof of your identity if you request access to or correction of your personal information.

In the event that a request for access is made, we will review our records to determine what personal information we hold relating to you and endeavour to respond to your request within a reasonable period after the request is made, but in any event, within thirty (30) days. Once we have notified you of the nature of the personal information, which we hold relating to you, we will give you access to your personal information in the manner requested by you, if it is reasonable and practicable to do so.

We do not levy a charge in respect of the making of a request for access to personal information held by us.

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However, we may charge you for the reasonable costs incurred by us in providing you with access to the personal information held by us. The Privacy Act provides instances where a holder of personal information may refuse to provide an individual with access to their personal information. If we refuse to give you access to your personal information, we will give you a written notice that sets out our reasons for the refusal and the mechanisms available to complain about the refusal.

**14. Correction of Personal Information**

Parabellum takes reasonable steps to keep your personal information as accurate, complete and up-to-date as possible. We make an effort to ensure this data is of high quality, but this relies on the accuracy and frequency of data provided by you. You can assist us by notifying us if your circumstances change, such as if your name changes.

If we hold personal information about you and you request that we correct the information, we will take reasonable steps to rectify the situation free of charge if we are satisfied that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. If we refuse to correct your personal information, we will give you a written notice setting out our reasons for the refusal and the mechanisms available to complain about the refusal.

**15. Complaints, Questions or Further Information**

If you wish to make a complaint about a breach of your privacy by Parabellum International, you may contact us using the contact details provided above. An appropriately qualified representative of Parabellum will investigate all complaints. We will endeavour to resolve your complaint as quickly as possible and, in any event, within thirty (30) days.

We will notify you of the outcome of the investigation, including how we propose to resolve your complaint and what, if any, corrective measures we will implement. If you are not satisfied with our handling of your complaint, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC).

For more information about doing so, visit <https://www.oaic.gov.au/privacy/privacy-complaints>

**16. Changes to Privacy Policy**

Parabellum International reserves the right to amend this Privacy Policy from time to time. If we do so, the amended Privacy Policy will be posted as soon as practicable following that amendment on our webpage [www.parabellum.com.au](http://www.parabellum.com.au)

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