

InterCheck Australia

Privacy Policy

Our Privacy Pledge

We understand that privacy is important to you and we value your trust in engaging with our services. That's why, InterCheck Australia is fully committed to protecting your personal and sensitive information and aims to be clear and open about how we use your information to provide you with our services.

Information security and privacy is at the front of everything we do, so you can continue to have trust and confidence in dealing with our organisation now, and well into the future.

As such InterCheck is fully committed to keeping your personal information confidential. We ensure compliance with federal and state Australian Privacy Laws and the Australian Privacy Principles as set out in the Privacy Act 1988.

This policy explains how we gather, handle, store, share, destroy and use your personal information and provides clear guidelines for you, so you can understand how we manage and protect your information.

Introduction

InterCheck Australia provides verification services for and on behalf of our clients who engage us to provide employment screening and probity checks of potential or existing employees, volunteers, contractors and consultants, to assess their suitability for employment or a position of trust. This service extends to individuals who require verification services for and on behalf of themselves for employment, positions of trust or verification purposes.

Why do we collect personal information?

InterCheck Australia is an Australian company that provides background checks and verification services to both individuals and businesses. In order to provide our services InterCheck needs to collect personal and sensitive information from individuals for the purpose of conducting our services. We may also use some of this information to better

understand your needs, as a customer, so we can better design and improve our products and services and to potentially let you know about other products and services you may be interested in.

What information do we collect?

In the course of business, it is necessary for us to collect Personal Information. We collect different personal and sensitive information depending on the product or service that you have requested or how you have engaged with our services. The information we collect from you may include:

- **For Criminal History Checks:** Sourced from the Australian Federal Police AFP and/or Australian Criminal Intelligence Commission (ACIC) -Name including Surname, Given name(s), all previously known names including aliases. Contact information including phone numbers and email addresses. Date of Birth and Place of Birth. Sensitive information including, Gender type, Biometric information, such as photographs collected from your phone or a webcam. Demographic information, such as occupation, place of residence for the past five years. Identity documents including License permits (driver's license, firearms license) or Passport details. Information or opinion relating to the applicant's current or previous application process, including information relating to the applicant's check purpose, including the place of work.
- **For other Background Checks or verification checks:** For the purpose of providing verification services, we may need to collect: Qualification or memberships, Resume information, occupations, references and referees details, contact details, addresses, date and place of birth, skills, qualifications, residential history, credit or bank details, citizenship and immigration status, professional or trade associations and memberships or accreditations, employment history and past responsibility or any other information relating to your career.
- **Identity Document Information:** For the purpose of identity verification and to confirm that the person making the application and giving consent are the same; we may need to collect Identity documents and information, including Biometric information, such as a live photograph in order to link the applicant to the identity documents.
- **Contact and business information:** In order to provide our services and support in a professional and effective manner, we may collect information such as, email address, phone numbers, residential business and postal addresses, occupation and role, credit card details and business information, including ABN contact details that allows us to

transact with the individual and/or provide them with our services and support.

Sensitive information

Due to the nature of the products and services that InterCheck provides, some of your personal information that we collect, and hold will be 'sensitive' information.' This information will only be obtained with your consent and we will only use it for the purpose for which you provided, except where otherwise allowed by law. Some types of sensitive information we collect include citizenship and immigration status, criminal history information, biometric and demographic information and gender information.

How do we collect your personal information?

The personal or sensitive information we collect about you is that in which you provide to us or which you authorise us to obtain.

InterCheck Australia collects this information either directly from you or from your employer/or a 3rd party, only when you have provided consent for them to provide the information. All information collected is done so lawfully, fairly, and not in an intrusive way and will only be collected with your consent.

We collect personal information in the following ways:

- Via our secure online application form on our website.
- When you complete and send a signed hard copy application form, either via the post or electronically.
- In person, over the phone or via email, for example, when you engage with our Help Desk; customers are made aware of the risks involved in sending any information including personal information such as identity documents, by mail or email in these instances.
- When you connect to a third party or connect to our services via a third party, for example, an integration partner, and have consented and are aware that InterCheck will be collecting the information for the purpose of providing our employment screening services.
- In the course of providing services to you. We may also collect information about you from third party suppliers and government database services, for the purposes of Identifying you and linking you to the provided identity documents.

Use and disclosure of your personal information

We're careful about how we use your information. The primary reason we collect, use and share your personal information is to enable the delivery of our products and services. We may also use your information to better understand your needs, so we can better design and improve our products and services and to potentially let you know about other products and services you may be interested in.

We collect, hold, use and disclose personal information for a variety of business purposes including:

- to provide the products or services you have requested from us; including:
- to lodge Nationally Coordinated Criminal History Checks Application and receive Police Check results from the National Police Checking Service, the service administered and operated by ACIC.
- to comply with our obligations under the agreement we have with the Australian Criminal Intelligence Commission (ACIC) regarding the National Police Checking Service. For more information about our agreement with the ACIC please refer below.
- to conduct a Visa Entitlement Verification Online (VEVO) check or to verify identity through the Australian Department of home affairs.
- for proof of identity purposes.
- to contact and communicate with you and to handle and respond to your enquiries, complaints or concerns.
- to process payments.
- to contact and communicate with you.
- for any other purpose we explain when the personal information was collected, including the use and disclosures outlined in this privacy policy; and
- to help improve our business, products and services and to help manage our business.
- to communicate with you about the relationship with us, including being able to provide our products and services to you.
- to comply with laws, obligations and to provide assistance to government or law enforcement authorities.
- to be able to lodge an application for and receive the results of an identity verification check with the document issuer through the Department of Home Affairs Document Verification Service (DVS);

Accreditation with the Australian Criminal Intelligence Commission (ACIC)

InterCheck Australia is a duly accredited body, in accordance with its agreement, under the 'Agreement for controlled access by duly Accredited Bodies to Nationally Coordinated Criminal History Checks' ('Agreement') in order to undertake the fulfilment NCCHC's for eligible applicants.

This agreement sets out the obligations and requirements necessary for InterCheck Australia to maintain accreditation status and access to the National Police Checking Service. If you wish to contact the ACIC please direct all enquiries via email to npcs@acic.gov.au

Providing you new products or services

From time to time, we may also use your information to tell you about products or services (including 3rd parties) we think you might be interested in. To do this, we may contact you by email, phone, SMS, social media, mail or other forms of advertising.

Opting "In" or "Out"

If you do not want us to send you marketing communications via email you can opt out at any time by using the unsubscribe option available. To opt out of all other means of communication, please contact our Data Protection Officer using the contact details provided below.

How long will we keep your personal information?

We will keep your information for as long as you are a customer of InterCheck, or pursuant to our legal obligations. For example, Australian Criminal History Checks are deleted after 12 months and identity documents supporting that same application must be retained for 12 months and deleted within 15 months.

Who do we disclose your personal information to?

We will disclose your information only in accordance with the professional services we provide as set out in this Privacy Policy.

During the process of providing our services and depending on the products or services being provided or the reason for your interaction with InterCheck we may share information about you with third parties, such as:

- Third party suppliers including but not limited to providers of criminal checks, law enforcement agencies, regulatory and licensing bodies, credit agencies, public registries, court or tribunal records, education providers or professional organisations
- Current employers or previous employers, for example, to confirm your employment
- Partner organisations
- Government agencies and law enforcement agencies or regulators
- Businesses who do some of our work for us – including direct marketing and IT support
- Auditors

Do we share the result of your background checks with 3rd parties?

- Where you have provided consent, in connection with a background screen ordered by one of InterCheck's business clients, InterCheck will share your background check result with that client.
- If InterCheck provides you with the option of sharing the results of the services you have obtained with one or more organisations, and you choose to share those results, InterCheck will share the results with those organisations (but will not share any underlying information provided to InterCheck to obtain the results).
- We may disclose personal information to a third party who has been provided with your background check results, including a Police Check result, to allow that third party to verify that result, through a verification functionality or feature. Where you have consented to us forwarding your Background Check results including a Police Check result, to a third party you also consent to us making that information available to that third party via a verification functionality or feature.
- When you disclose personal information to a third party by giving them a copy of your Background Check result or Police Check result (either in electronic or hard copy) you also consent to us also disclosing your personal information to that third party through a verification functionality or feature.
- You acknowledge and agree that such disclosure through a verification functionality or feature is appropriate and necessary to maintain security and integrity of the personal information contained in any of your background check or police checks results.

How do we store and protect your personal information?

InterCheck is committed to protecting and securing your personal information. We take reasonable precautions to ensure that all your personal information that we hold is safeguarded and protected from misuse, loss, unauthorised use, modification or disclosure, through the implementation of technical, physical and administrative information security safeguards as prescribed in our Enterprise' Information Security Policy.

The confidentiality and integrity of personal information is protected by:

Secure storage	Your information is stored using enterprise-grade cloud hosting services secure with AES-256 encryption in the AWS data center located in Sydney.
Staff Training	InterCheck embeds privacy and security into our culture. We train our staff in how to keep your information safe and secure by driving awareness and procedure compliance into our business activities.
System Security	Restricting access to our internal systems using technical access controls on a need-to-know basis. Firewalls restrict access to internal system components to a whitelist of trusted IPs. Running antivirus and anti-malware scanners with up-to-date threat signatures. Regular patching of servers and workstations running current operating systems and modern browsers.
Building and Physical Security	We control access to sensitive areas, management of physical and electronic documents, and secure document disposal. Physical security measures are in place preventing unauthorised access to our premises;
Transactional Security	We enforce secure socket layer (SSL) connections for every page of our website and our application. The use of SSL means that data traffic between your computer and our site is encrypted and protected at all times
Audit and Testing	InterCheck employs independent, industry certified, security experts with the experience and track record to support our security aims.
Destroying or de-identifying data when no longer required	We will store the information associated with your account for the time period required to comply with

	<p>applicable record keeping laws. For example, in the case of Police Checks we are obliged to retain information used to submit your request for at least 12 months, and to delete the check result itself within 12 months. Otherwise, we will keep the information until such time as you delete your account. When we no longer need information, we take reasonable steps to destroy or de-identify it.</p>
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Transfer of personal information overseas

For the purpose of conducting an Australian Nationally Coordinated Criminal History Check, InterCheck will **not** transfer or store any data related to this service overseas.

For other types of background checks within our product range and in the course of carrying out these services, we may need to transfer personal information overseas in order to liaise with information providers, potential or past employer's and/or our offshore related entities. We will transfer personal information overseas only if:

- the candidate has consented to the transfer,
- the transfer is necessary for us to provide the client with their requested service,
- it is not practical to obtain a candidate's consent, the transfer is for the candidate's benefit and the candidate's consent would likely be given; or
- we have taken reasonable steps to ensure that a candidate's personal information will not be held, used, or disclosed by the recipient in a manner inconsistent with this Privacy Policy and the Privacy Act.

Transaction information

We do **not** store any card information directly. ANZ Bank Australia captures all card information on our behalf and in accordance with their own data security policies.

Minors and children's privacy

We will generally seek parent or guardian consent to collect the personal information of children under 16. However, if we are legally obliged to provide the product to a person aged under 16 without such consent then we may not obtain consent in those circumstances.

For some products provided by InterCheck we are required to obtain parental or guardian consent for persons aged under 18 years of age, for example, Australian criminal history checks. Consent of parents or guardians will need to be obtained in those circumstances.

How can you access your personal information and correct it if it is wrong?

You have a right to request access to your personal information which we hold about you at any time. You can make such a request by contacting the InterCheck Privacy Officer or the InterCheck support team using the contact details set out in this Policy. We will always confirm your identity before giving access to your personal information. InterCheck will provide this personal information free charge to the candidate unless there is an exception subject under relevant Privacy Laws.

If candidates are able to establish that the information InterCheck holds about them is not accurate, complete or up to date, the candidate can then request us to correct the information. We will then take reasonable steps to correct this information or if necessary, discuss alternative actions with the candidate.

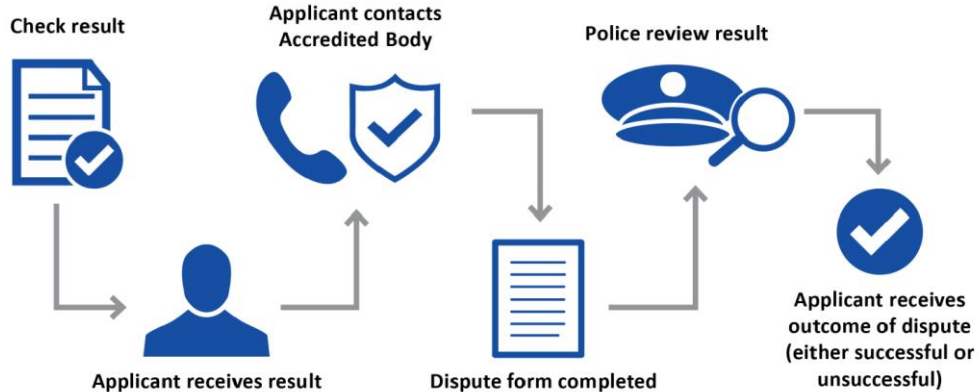
Candidates may request access to their personal information that InterCheck Australia holds about them by contacting our support team on [1300 794 440](tel:1300794440) or via email help@intercheck.com.au, where we manage all queries, disputes and complaints.

Disputing Your Criminal History Check Results (issued by ACIC)

If you believe that the result returned on your Police Check is incorrect, then you do have a right to dispute the result. To Dispute your result, you can contact InterCheck directly on the number or email below, and we will advise you of all information and supporting evidence you need to provide us, in order for InterCheck to lodge the ACIC's Nationally coordinated criminal history check Dispute Form (dispute form) to the ACIC.

The Police will then investigate the dispute including reviewing all information and supporting evidence and provide the outcome to you (either being successful or unsuccessful).

DISPUTES



For more information on the dispute process, see our dispute help page. If you have further questions, please contact us at help@intercheck.com.au or call us on (03) 8820 4069 for assistance.

Addressing privacy concerns or complaints

At InterCheck we value our customers. We will always aim to be fair and responsive. If you have a complaint you have the right to expect that we will handle it in a friendly and professional way. Customers have the right to express concerns about the way we handle their personal information and we strive to address such concerns in a professional and timely manner. Customers having queries about our privacy practices, this Privacy Policy or having a complaint about our service can contact our Privacy Officer to resolve their complaints.

When we receive a complaint, we look on it as valuable feedback that may help us to improve the services we offer and to ensure your needs are met in a satisfactory and appropriate manner.

Customers can send their privacy queries or complaints to:

The Privacy Officer
InterCheck Australia Pty Ltd
PO Box 213, Flinders Lane Vic 8009

Our Privacy Officer can also be contacted on:

Email: help@intercheck.com.au

Phone: (03) 8820 4069

We will make all efforts possible to investigate your complaint and advise you of the outcome as soon as possible. If the matter is not resolved to your satisfaction you can then refer your complaint to the Office of the Australian Information Commissioner who can be contacted through the following website: <https://www.oaic.gov.au/privacy/privacy-complaints/>

Changes to our Privacy Policy

This Privacy Policy may be amended, depending if our business operations change or if any Privacy Laws are changed. If this is the case, then an updated version will replace and will supersede this Privacy Statement and will be available on our web site for viewing.

Visiting our website

InterCheck Australia's web sites including www.policecheckexpress.com.au, like most other commercial web sites, may collect information from your visit. This information is used to administer and improve our websites only. We do not identify you personally. We may collect the following information from your visit by use of cookies. Cookies are small data files that are downloaded from our web servers and stored on your hard drive. A cookie does not identify individuals personally, but it does identify computers. Most browsers can be configured to refuse to accept cookies. You can also delete cookies from your hard drive. However, doing so may hinder the URL of and webpage from which you accessed our site ("the referrer").

Additional information and applicable legislation

This privacy policy is applicable with Australian Crime Commission Act 2002.

If you require additional information about privacy please visit the following site: www.privacy.gov.au/