

Privacy Policy

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1. Background

Cerulean Space Pty Ltd ("the Company") is committed to complying with the provisions of the Privacy Act 1988 (Cth) ("the Privacy Act") that relate to how entities handle Personal Information. The Company has adopted the Australian Privacy Principles ("APPs") contained in the Privacy Act. The APPs govern the way in which organisations collect, use, disclose, store, secure and dispose of your Personal Information. A copy of the APPs may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

2. Purpose

This policy outlines how the Company will handle Personal Information relating to individuals in order to ensure the Company meets its obligations under the *Privacy Act*.

By providing Cerulean Space Pty Ltd with your Personal Information, you consent the Company in collecting, holding, using and disclosing your Personal Information in accordance with this policy.

3. Applicability

This policy applies to all Personal Information collected, stored, and/or processed by the Company. All Company employees and contractors must conform to this policy.

If the Company is working under the directive of a third party organisation (e.g. in the capacity of a sub-contractor), the third party organisation's Privacy Policy will take precedent over this Policy unless otherwise specified.

4. Definitions

In this policy, the expressions "you" and "your" refer to each and every individual whose personal information the Company may handle from time to time.

A list of defined terms is set out below:

- a) APPs means the Australian Privacy Principles.
- b) Company refers to Cerulean Space Pty Ltd (ACN 663 964 887).
- c) Personal Information means information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances. For example, Personal Information may include:
 - an individual's name, signature, address, phone number or date of birth;
 - Sensitive information;
 - credit information;
 - employee record information;

- photographs;
- internet protocol (IP) addresses;
- voice print and facial recognition biometrics (because they collect characteristics that make an individual's voice or face unique); and/or
- location information from a mobile device (because it can reveal user activity patterns and habits).

d) Privacy Act means the Privacy Act 1988 (Cth).

e) Sensitive Information means Sensitive information is personal information that includes information or an opinion about an individual's:

- racial or ethnic origin;
- political opinions or associations;
- religious or philosophical beliefs;
- trade union membership or associations;
- sexual orientation or practices;
- criminal record;
- health or genetic information; and/or
- some aspects of biometric information.

5. Policy Statements

5.1 Types of Personal Information Collected

The Company will only collect, use or disclose an individual's Personal Information to the extent that is reasonably necessary for one or more of our functions or activities. This includes the following kinds of information:

- a) prospective or existing supplier or third party partner contact information such as name, role title, company name, company address, telephone number, and email address;
- b) prospective or existing client's contact information such as an individual's name, phone number, email address, and emergency contact. Additional individual details such as gender, ethnicity, date of birth, address, and other health related details may be collected if relevant to the performance of services and/or if voluntarily provided to the Company by the individual;
- c) existing employee's contact information such as name, address, telephone number and email address; and information relating to an individual's payments, salary or wages (such as PAYG summaries, bank account details, tax file numbers);
- d) existing contractor's information relating to an individual's name, title, address, email address, phone number, and payment details (e.g. bank account); and
- e) prospective employee and contractor pre-employment information such as curriculum vitae, resume, evidence of academic results, qualifications, licences and pre-employment medical results.

5.2 Method of Collection

Personal Information will generally be collected from you in person, over the phone, or through written communications (either on paper or electronic) or by you completing forms. The Company's

preference is to collect Personal Information about an individual directly from that individual unless it is unreasonable or impractical to do so. In such a case the Company will take reasonable steps to ensure that you are made aware of the information provided by the third party.

5.3 Purpose of Collection

Purposes for which the Company may collect Personal Information include, but are not limited to:

- a) to engage with a potential customer, supplier or partner;
- b) to engage with a customer's emergency contact in case of a medical and/or health related situation during the process of service provisioning;
- c) to consider job applications and whether to employ an individual;
- d) to retain an individual as a contractor;
- e) to interview and consider an individual as a prospective employee or contractor;
- f) for complaints handling purposes; and
- g) for any other purpose permitted by law.

5.4 Use and Disclosure

The Company will generally use and/or disclose Personal Information for the primary purpose of collection and reasonably related secondary purposes, unless you consent to another use or an exception under the APPs or Privacy Act applies.

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

Secondary purposes might include business improvement programs, disclosure of metrics for statutory reporting purposes, and disclosure to maintenance personnel or other third party contractors (e.g. cloud service providers) who may be unable to avoid accessing Personal Information in the course of providing technical or other support services to our Company.

5.5 Access, Correction and Further Information

The Company will take such steps as are reasonable to ensure that the Personal Information collected remains accurate, up to date and complete.

The Company will provide you with access to your Personal Information held by us unless we are permitted under the Privacy Act to refuse to provide you with such access.

Please contact Cerulean Space Pty Ltd via the details below if you:

- a) wish to have access to the Personal Information which we hold about you;
- b) consider that the Personal Information which we hold about you is not accurate, complete or up to date; or
- c) require further information on our Personal Information handling practices.

Company Secretary: Kanling Juric
Email: info@ceruleanspace.com.au

There is no charge for requesting access to your Personal Information. If you consider that the Personal Information which the Company holds about you is inaccurate, out of date, incomplete, irrelevant or misleading, reasonable steps will be taken in line with relevant obligations under the Privacy Act, to correct that information if you so request. The Company will respond to all requests for access and/or correction within a reasonable time.

In order to protect your Personal Information the Company may require identification from you before releasing the requested information.

5.6 Storage and Retention

The Company will store Personal Information in hard copy and electronic formats.

The Company's primary storage location will be based in Australia. However, at times cloud-based services may be used to perform business activities. This may result in off-shore storage of Personal Information such as North America, Asia and Europe. The Company will take reasonable steps to evaluate the adequacy and appropriateness of such services.

When your Personal Information is no longer needed for the purpose for which it was obtained, the Company will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored will be kept for a minimum of seven years since the most recent client contact. In line with the Australian, New Zealand and Asian Creative Arts Therapy Association (ANZACATA)'s code of ethics and standards, any information collected regarding a child (<18 years) will be kept until they are 25 years old, whichever occurs later.

5.7 Security

The Company will take reasonable steps to:

- a) protect the Personal Information held from misuse, interference and loss;
- b) protect the Personal Information held from unauthorised access, modification or disclosure; and
- c) destroy or permanently de-identify Personal Information once the Company no longer requires it for our business purposes.

Refer to the *Information Security Policy* for more details.

5.8 Openness

From time to time, the Company may change the policy on its handling of Personal Information or the types of Personal Information that are held. You may obtain a copy of the current Policy from by contacting the details listed above. Instructions to request a copy of the *Privacy Policy* is also made available on the Cerulean Space website.

5.9 Complaints

If you have a complaint about the way in which the Company has handled any privacy issue, including your request for access or correction of your Personal Information, you should advise the Company's Company Secretary via the contact details set out above.

If you remain unsatisfied with the way in which the Company has handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (www.oaic.gov.au) for guidance on alternative courses of action which may be available.