

# PRIVACY POLICY



Professional  
Hospitality

# 01

'This Privacy Policy provides information on how Professional Hospitality Pty Ltd and its affiliated entities (including PHSQUARED Pty Ltd and PHIP Pty Ltd) (**Professional Hospitality**, also referred to here as **We, Us** or **Our**) manage personal information collected by Professional Hospitality.

Professional Hospitality is not (as at the date of last revision, listed at the end of this policy) bound by the Privacy Act 1988 (Cth) (**Act**); however We wish to give comfort and confidence to Our clients and those people interacting with Us and have therefore committed to complying with the Australian Privacy Principles (**APPs**) set out in the Act.

Except where a permitted general situation applies pursuant to the APPs, this Privacy Policy will apply to all dealings with Professional Hospitality, whether in person, or via telephone, email, correspondence or our website at [www.professionalthospitality.com.au](http://www.professionalthospitality.com.au).

By providing your personal information to Us, accessing our services or otherwise interacting with Us, you consent to the handling of your personal information in accordance with this Privacy Policy.

Professional Hospitality will ensure that all of Our officers, employees and subcontractors are aware of and understand Professional Hospitality's obligations under the APPs and under the Act when the Act applies to Us. Professional Hospitality will achieve this through the provision of training and through maintaining and implementing internal policies and procedures to prevent personal information from being collected, used, disclosed, retained, accessed or disposed of improperly.

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## WHAT IS 'PERSONAL INFORMATION'?

'Personal Information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

## COLLECTION OF PERSONAL INFORMATION

Professional Hospitality collects and holds personal information where reasonably necessary in order to carry on its business as a provider of online employment inductions, employee training, paperless compliance including work health & safety, food safety and employment record keeping / processing including recruitment.

We collect personal information from you when you contact Us via our website, portal, by email or by telephone. This can also occur when you respond to Our enquiry forms or questionnaires. Your personal information is held securely in Our offices and on Our computer systems and on servers so that we can better provide Our services to you and Our clients

The kinds of personal information that are collected and held include:

- Full name;
- Date of birth;
- Gender;
- Contact information (telephone, email, home address);
- Emergency contact details; Bank details; Superannuation details;

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## COLLECTION OF PERSONAL INFORMATION CONT...

- Tax file number;
- Credit card details;
- Visa details;
- Copy of passport;
- Copy of driver licence; and
- Any known allergies, illness or injury that could affect an individual's ability to perform a role.

If any such personal information is not able to be collected, We may not be able to provide our services either in whole or in part.

The personal information which Professional Hospitality collects will depend upon the purposes for which it is collected, held, used and disclosed. The main purposes are:

- To provide online employment inductions – in the course of acting for a client, Professional Hospitality are likely to collect personal information about individual employees and third parties (employee emergency contacts/ next of kin);
- For marketing – during online interactions Professional Hospitality sometimes asks to collect contact details in order to be able to provide information to otherwise market Our services;
- To respond to comments, enquiries or requests made via our website; and
- To provide a management tool for our clients in relation to the various services We provide as outlined above.

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## COLLECTION OF PERSONAL INFORMATION CONT...

Professional Hospitality will only collect sensitive information in circumstances where:

- It is reasonably necessary for one or more of the services Professional Hospitality provide or functions We carry out and the relevant individual consents to the collection of the information; or
- Professional Hospitality are required or authorised by law (including the APPs) to collect the sensitive information.

Professional Hospitality will, if it is reasonable or practicable to do so, collect personal information directly from the relevant individual. Generally, Professional Hospitality only collects personal information directly and does not collect personal information from a third party or a publicly available source.

If Professional Hospitality receives personal information that is unsolicited, We will determine as soon as reasonably practicable whether Professional Hospitality could have lawfully collected that information as part of Our functions or activities. If Professional Hospitality does not so determine, then We will (if it is lawful and reasonable) destroy the information or ensure that it is de-identified.

Individuals may in accordance with the APPs choose to deal with Professional Hospitality anonymously or under a pseudonym where lawful and practical (We consider this qualification will rarely be available, due to the nature of Professional Hospitality's business). Where anonymity or use of a pseudonym is not available under the APPs, Professional Hospitality may request that an individual identify him or herself. For example, whenever documents or information are to be submitted to a government agency, a superannuation fund or a financial institution, it is essential that We record an individual's name accurately.

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## USE AND DISCLOSURE OF PERSONAL INFO

Any personal information collected by Professional Hospitality will only be used and disclosed for the primary purpose for which it has been collected by Professional Hospitality or as consented by you or as authorised by law including the APPs. In particular, we will disclose your personal information to our clients where they are seeking to employ or engage you, and may also disclose your personal information among our affiliated entities.

We may use your contact details to send you information or marketing materials which may be of interest to you. However, you may at any time opt out of receiving such materials by contacting Professional Hospitality on [info@professionalhospitality.com.au](mailto:info@professionalhospitality.com.au) or sending a request to the address below. Upon receiving such a request, Professional Hospitality will remove your contact details from our distribution lists.

Professional Hospitality does not normally transfer your personal information to recipients in overseas countries and it is normally stored in Australia.

Personal information may need to be disclosed to external service providers or third parties engaged by Professional Hospitality in order for those service providers to fulfil their service obligations to Us.

For example, IT service providers who assist in managing Professional Hospitality's servers and networks may need to access client data in order to maintain the servers and networks. We may also disclose your personal information to service providers who provide Us with information regarding a potential employee's eligibility to work in Australia, or to payroll service providers where Our clients wish to use such services.

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## USE AND DISCLOSURE OF PERSONAL INFO CONT...

Where personal information is disclosed to an external party, Professional Hospitality will take reasonable steps to ensure that the external party treats such information confidentially and in accordance with the APPs.

There may be circumstances in which it is necessary for Professional Hospitality to use or disclose an individual's government related identifier such as a tax file number, a driver licence number issued by State and Territory Authorities, or an Australian passport number, for example where reasonably necessary to verify the identity of an individual for the purposes of Our activities or functions. We will not use or disclose government related identifiers unless Professional Hospitality are required or authorized to do so by law including the APPs or by a court or tribunal order, or in order to fulfil our obligations to a State or Territory authority.

## ACCURACY OF PERSONAL INFORMATION

Professional Hospitality will take reasonable steps to ensure that all personal information We collect, use or disclose is accurate, complete and up-to-date.

If you believe your personal information is not accurate, complete or up-to-date, please contact Professional Hospitality (see the Contacting Us section for more information).

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## SECURITY

Personal information may be stored by Professional Hospitality in hard copy documents or electronically. Professional Hospitality is committed to keeping personal information secure and safe. Some of the ways we do this are:

- Requiring employees and contractors to enter into confidentiality agreements;
- Security measures for access to our computer systems; and
- Security measures for our websites (see the **Your Privacy on the Internet** section for more information).

We will review and update our security measures from time to time.

In addition, Professional Hospitality will review the personal information held by Us from time to time, ensuring that information which is no longer needed for any purpose for which it may be used or disclosed is destroyed or de-identified (provided it is lawful for us to do so).

## YOUR PRIVACY ON THE INTERNET

Professional Hospitality takes care to ensure that the information you provide to Us via our website or web portals is protected. For example, our website has electronic security systems in place, including the use of firewalls.

You may be able to access external websites by clicking on links we have provided. Those other websites are not subject to Our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.



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## YOUR PRIVACY ON THE INTERNET CONT...

Professional Hospitality's internet service provider makes a record of each visit to Professional Hospitality's web site/ web portals. When you visit Our website or web portal, the following information is logged for statistical purposes only:

- Your server address;
- Your top level domain name (for example .com, .gov, .au, etc);
- The date and time of your visit to the site;
- The pages accessed and documents downloaded by you;
- The previous site visited by you; and
- The type of browser used by you.

When you visit Professional Hospitality's website, Our server will attach a small data file called a '*cookie*' to your computer's memory (unless your web browser is set to refuse cookies). A '*cookie*' is a very small text file placed on your hard drive for record keeping purposes by Our web page server. The cookie's purpose is to notify Our web page server that the same visitor has returned to Our web site and to collate anonymous information on when and how Our website is used.

The information collected is not linked to your identity in any way or any other information provided by you.

## COMMUNICATIONS

If you have registered through our website you may receive communications including email, text messages, phone calls and post from Professional Hospitality but may at any time contact Us to have your name removed from our distribution lists.

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## ACCESSING AND CORRECTION PERSONAL INFO

You may request access to personal information that Professional Hospitality holds about you (see the **Contacting Us** section for more information).

Professional Hospitality will acknowledge your request within 5 business days of the request being made. If access is being denied, We will usually advise you in writing of the denial of access and the reasons for same within 10 business days of Our acknowledgement. If access is being granted, access will usually be granted within 10 business days of Our acknowledgment or, if the request involves complex considerations or voluminous photocopying or scanning, within the earliest of a further 5 business days and 30 calendar days of the request. We will let you know which timeframe applies to your request and if any delays are anticipated.

You will need to verify your identity before access to your personal information is granted.

While Professional Hospitality cannot and do not charge an 'application fee' for you applying to access your personal information, We may charge a fee for actually giving you access to your personal information in your preferred format (where reasonable and practicable), which may cover Our costs involved in locating and collating information as well as reproduction costs if any.

Whenever reasonable and practicable, Professional Hospitality will endeavour to make the information available to you in the manner requested by you (e.g. if you have asked for the information to be emailed to you, We will endeavour to email the information to you. However, if the file size would be too large, We may send you the information by hard copy instead of email or arrange for you to personally inspect it).

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## ACCESSING AND CORRECTION PERSONAL INFO CONT...

If you request access to your personal information, or if you request that Professional Hospitality correct your personal information, We will allow access or make the correction unless We consider that there is a reasonable reason to withhold the information or not make the correction (including pursuant to the APPs).

Under the APPs, Professional Hospitality may refuse to grant access to personal information to the extent that:

- We believe that granting access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- Granting access would have an unreasonable impact upon the privacy of other individuals;
- Denial of access is required or authorised by law or by a Court or Tribunal order
- Giving access would be unlawful;
- The request for access is frivolous or vexatious;
- Legal proceedings are underway or anticipated and the information would not be accessible by way of the discovery process in those proceedings;
- Giving access would reveal Our intentions in relation to negotiations between us and you in such a way as to prejudice those negotiations;
- Giving access is likely to prejudice enforcement related activities conducted by, or on behalf of, an enforcement body;
- Giving access is likely to prejudice action being taken or to be taken with respect to suspected unlawful activity or serious misconduct relating to Our functions or activities; or
- Giving access would reveal information in connection with a commercially sensitive decision making process.

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## ACCESSING AND CORRECTION PERSONAL INFO CONT...

If you are aware that Professional Hospitality holds personal information about you that is incorrect, please contact us (see the **Contacting Us** section for more information). Subject to the APPs we will respond within a reasonable period and take reasonable steps to correct that information. We will not charge you for the request or for correcting the information. If Professional Hospitality does not agree to make a correction to your personal information, you may provide a statement about the requested corrections, and We will ensure that the statement is apparent to any users of the relevant personal information.

If Professional Hospitality does not agree to provide access to your personal information (or does not agree to give access in the manner requested by you), or does not agree to correct your personal information, then subject to the APPs We will provide written reasons for the refusal and the mechanisms available to complain about the refusal (see the **Complaints** section for more information).

## COMPLAINTS

If you believe there has been a breach of the APP's, you are entitled to complain to Professional Hospitality. Please direct any complaints in writing to Our privacy contact below. We will investigate your complaint and endeavour to resolve it within a reasonable period, not usually exceeding 30 days.

If you consider that Professional Hospitality has not dealt with your complaint adequately, you may complain to the Office of the Australian Information Commissioner on the following details:

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## COMPLAINTS CONT...

**Post:**

Office of the Australian Information Commissioner (OAIC)  
GPO Box 5218  
SYDNEY NSW 2001

**Email:**

enquiries@oaic.gov.au

**Telephone:**

1300 363 992

## CONTACTING US

To contact us about any privacy matter or to notify us that you wish to be removed from our distribution lists, please either:

- Send Professional Hospitality an email to:  
info@professionalhospitality.com.au; or
- Send Us a letter addressed as follows:

The Privacy Officer  
Professional Hospitality  
PO Box 572  
Spring Hill, QLD 4004

## CHANGES TO OUR PRIVACY POLICY

From time to time it may be necessary for Professional Hospitality to revise our privacy policy. We reserve the right to change Our privacy policy at any time without prior notice. Professional Hospitality will notify you of the changes by posting an updated version of the policy on our website at [www.professionalhospitality.com.au](http://www.professionalhospitality.com.au).