



## NATPAY TIMEHSHEETS APP PRIVACY POLICY

In accordance with the Privacy Act 1988 (as amended by the Privacy Amendment (Private Sector) Act 2000) (Commonwealth), the Information Privacy Act 2000 (State) and the Health Records Act 2001 (State) **NatPay Timesheets App (owned by National Payroll Group Pty Ltd)** is required to comply with the 10 National Privacy Principles (NPPs), the 10 Information Privacy Principles (IPPs) respectively. NatPay Timesheets is therefore also bound by the privacy obligations associated with National Payroll Group Pty Ltd.

**NatPay Timesheets** takes its privacy obligations seriously and will seek to take all reasonable steps in order to comply with privacy legislation in order that we can protect the privacy of the personal information that we hold. This policy sets out how we intend to do so. Where any difference exists between privacy legislations, any other legislation or any other lawful requirement, the legislation or other lawful requirement with the strongest application is to be applied.

### NPP1, and IPP1 – Collection

**NatPay Timesheets** collects personal information from individuals. Whenever such information is collected it will always be for one or more of our functions or purposes; it will only be collected by lawful and fair means; it will not be collected in an unreasonably intrusive way; and will only be collected in accordance with any other requirement under the relevant privacy principle/s.

The types of personal information we may collect, generally, are as follows:

**The type of information collected by NatPay Timesheets regarding individuals generally includes the following:**

Names;  
email addresses;  
Telephone numbers;  
Date of Birth;  
Dates and times worked;  
Comments on where the work was performed;

**NatPay Timesheets** collects personal information for a number of different primary purposes, which have been identified as follows:

Collection of information regarding times work for payment of wages;  
Changes to existing email address;  
Changes to existing contact details

On any occasion of personal and/or health information being collected it will only be for one of these primary purposes, which will be identified in the collection statement (as required by NPP 1.3, IPP 1.3 and for which reasonable steps will be taken to provide such information to the individual.

## NPP2, and IPP2 Use and Disclosure

**NatPay Timesheets** will only use and disclose personal information for the primary purpose for which it was collected, or for a secondary purpose (where that secondary purpose is related to the primary purpose) when the requirements, as detailed in the privacy principles, for the use or disclosure of that personal information for a secondary purpose can be met. Generally this will mean;

- the individual will have a reasonable expectation that **NatPay Timesheets** may use and/or disclose such information for the secondary purpose; or
- the individual, or if unable, their authorised or legal representative, has consented; or
- such use and/or disclosure is required, authorised or permitted under law, or for lawful action, or for the prevention of unlawful activity; or
- the use and/or disclosure is for statistical purposes; or
- the use and/or disclosure is necessary to lessen or prevent a serious and imminent threat to the life, health, safety or welfare of an individual or the public; or

**NatPay Timesheets** may usually disclose personal information to:

Any law that requires the particular information to be collected; and

The main consequences (if any) for the individual if all or part of the information is not provided.

**NatPay Timesheets** will ensure that personal information will only be used or disclosed for a secondary purpose when it can be demonstrated that there is a relationship with the primary purpose.

## NPP3 and IPP3 – Data Quality

**NatPay Timesheets** will take all reasonable steps to ensure the personal and health information it collects, uses, holds and discloses is accurate, complete, up to date and relevant. We will do this by;

- verifying the accuracy, completeness and relevance of personal and/or health information when it is collected; and
- maintaining the accuracy, currency, completeness and relevance of the personal and health information we hold by:
  - If it is reasonable and practical to do so, **NatPay Timesheets** will collect personal information about an individual only from that individual. If, however this information is collected from someone else, **NatPay Timesheets** will act reasonably to ensure the individual is or has been made aware of the matters listed above, unless certain exemptions apply.

## **NPP4 and IPP4 – Data Security and Data Retention**

**NatPay Timesheets** will take reasonable steps to ensure the personal information we hold is protected from misuse and loss, and from unauthorised access, modification or disclosure. We will do this through:

- the provision and use of a private login for each individual;
- the provision of authorised only access to the records of an individual
- the provision and use of appropriate security measures for electronic records, including firewall and password protection
- the maintenance of appropriate physical security measures for **National Payroll Group Pty Ltd** offices and facilities; and
- restricting employee access to personal information on a “need to know” basis

Much of the personal information held by **NatPay Timesheets** is required to be kept for 7 years under contractual or legal requirements. Nonetheless, we will take reasonable steps to ensure that personal information we hold, which is no longer required, including under any contractual or legal requirement, is destroyed or de-identified in a secure manner.

## **NPP5 and IPP5 – Openness**

**NatPay Timesheets** will be open in how it manages the personal information it collects. It will do so by having in place a publicly available statement setting out how personal information is handled and through the establishment of this privacy policy, which will be made available to an individual if requested.

## **NPP6 and IPP6 Access and Correction**

Upon request, **National Payroll Group Pty Ltd/NatPay Timesheets** will provide individuals with access to their personal information, unless one of the exceptions which requires or allows access to be refused, as set out in the respective privacy principles, is exercised.

Such exceptions apply generally as follows:

- providing access would pose a serious threat to the life or health of any individual;
- providing access would have an unreasonable impact on the privacy of another individual;
- for personal information, the request for access is frivolous or vexatious;
- for health information, the request is unreasonable and repeated, with access to the same information having previously been provided
- there are considerations with regard to legal proceedings which are underway, being investigated or anticipated
- providing access would be unlawful

Any request for access made to **NatPay Timesheets** is to be made in writing. Individuals requesting access will be required to establish their identity, and if a third party legally able to request access on behalf of another individual, the bona fides of their right to be provided with access.

For requests for access to personal information, access will be provided within 14 days for simple requests and 30 days for more complicated requests. For requests for access to health information, access will be provided within 45 days. If a request for access is refused, the individual will be advised in writing of the reason for refusal, and the same timeframes will apply.

For access to health information, the individual may request the way in which they wish access to be provided. **NatPay Timesheets** will endeavour to provide access in the manner requested, whenever reasonably possible.

If an individual identifies that the information **NatPay Timesheets** holds on them is inaccurate, incomplete, misleading or not up to date, they may request that information be corrected. **NatPay Timesheets** will then make all reasonable effort to correct the information, unless we are not willing to correct it. Should we not be willing to correct the

information, written reasons for refusal will be provided to the individual. In such a circumstance the individual may request an appropriate notation be appended to the information that was sought to be corrected.

Requests for access or correction of personal information are to be made to:

Andrew McCarthy, General Manager – National Payroll Group Pty Ltd  
111-113 Bromfield Street, Colac Vic 3250 Ph: 1300 628 729

#### **NPP7 and IPP7 – Identifiers**

It is necessary for **NatPay Timesheets** to adopt identifiers for the personal and health information we hold, however we will not adopt as an identifier any identifier assigned by a commonwealth or state agency.

#### **NPP8 and IPP8 - Anonymity**

Wherever lawful and practicable, **NatPay Timesheets** will provide individuals with the option of being provided with a product or service by us on an anonymous basis.

#### **NPP9 and IPP9 – Transborder Data Flows**

Under the NPPs **NatPay Timesheets** will not disclose an individual's personal information to an organisation or individual outside Australia unless, generally, the country to which it is being disclosed has a similar level of privacy protection or the individual, or their authorised or legal representative, has consented to the disclosure.

Under the IPPs and HPPs we will not disclose an individual's personal and/or health information to an organisation or individual outside Victoria unless, generally, the state or country to which it is being disclosed has a similar level of personal information and health records protection or the individual, or their authorised or legal representative, has consented to the disclosure, or the disclosure is required by law.

#### **NPP10 and IPP10 – Sensitive Information**

**NatPay Timesheets** will not seek to collect sensitive information unless there is a requirement to collect such information and, generally;

- the individual has consented to such collection; or
- the collection is required by law; or
- the collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any individual

Furthermore, **NatPay Timesheets** will not disclose any sensitive information without the consent of the individual.

#### **Complaint Resolution**

Should an individual, or their authorised or legal representative, have a complaint regarding our privacy practices or wish to make a complaint about how their personal information has been managed they should in the first instance contact the General Manager of National Payroll Group, Andrew McCarthy on 1300 628 729. Any complaints received will be handled in accordance with our Privacy Complaints Policy.