



Australian Privacy Principles (APP) Privacy Policy

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MY FREIGHT CAREER PTY LTD is committed to maintaining the privacy and confidentiality of its RTO personnel and participant records. MY FREIGHT CAREER PTY LTD complies with the *Privacy Act 1988 including the 13 Australian Privacy Principles (APPs)* as outlined in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

As a component of our risk management practices, MY FREIGHT CAREER PTY LTD has conducted a Privacy Impact Assessment for all operations. Mitigation actions from this risk assessment have been implemented for the management of privacy risks at each stage of the information lifecycle, including collection, use, disclosure, storage, destruction and de-identification.

Providing an overall framework for our privacy practices, MY FREIGHT CAREER PTY LTD has developed and implemented this APP Privacy Policy.

MY FREIGHT CAREER PTY LTD manages personal information in an open and transparent way. This is evident in the implementation of practices, procedures and system we outline in this policy, that ensure our compliance with the APPs and any binding registered APP code, and provide suitable procedures for MY FREIGHT CAREER PTY LTD personnel to be able to deal with related inquiries and complaints that may be received from time to time.

The following sections of this policy outline how we manage personal information.

Australian Privacy Principle 1 – Open and transparent management of personal information

Purposes for information collection, retention, use and disclosure

MY FREIGHT CAREER PTY LTD retains a record of personal information about all individuals with whom we undertake any form of business activity. MY FREIGHT CAREER PTY LTD must collect, hold, use and disclose information from our clients and stakeholders for a range of purposes, including but not limited to:

- Providing services to clients;
- Managing employee and contractor teams;
- Promoting products and services;
- Conducting internal business functions and activities; and
- Requirements of stakeholders.

As a government registered training organisation, regulated by the Australian Skills Quality Authority, MY FREIGHT CAREER PTY LTD is required to collect, hold, use and disclose a wide range of personal and sensitive information on participants in nationally recognised training programs. This information requirement is outlined in the *National Vocational Education and Training Regulator Act 2011* and associated legislative instruments. In particular, the legislative instruments:

- *Standards for NVR Registered Training Organisations 2012*; and
- *Data Provision Requirements 2012*.

It is noted that MY FREIGHT CAREER PTY LTD is also bound by various State Government Acts requiring similar information collection, use and disclosure (particularly *Education Act(s)*, *Vocational Education & Training Act(s)* and *Traineeship & Apprenticeships Act(s)* relevant to state jurisdictions of MY FREIGHT CAREER PTY LTD operations).

It is further noted that, aligned with these legislative requirements, MY FREIGHT CAREER PTY LTD delivers services through a range of Commonwealth and State Government funding contract agreement arrangements, which also include various information collection and disclosure requirements.

Individuals are advised that due to these legal requirements, MY FREIGHT CAREER PTY LTD discloses information held on individuals for valid purposes to a range of entities including:

- Governments (Commonwealth, State or Local);
- Australian Apprenticeships Centres;
- Employers (and their representatives), Job Network Providers, Schools, Guardians; and
- Service providers such as credit agencies and background check providers.

Kinds of personal information collected and held

The following types of personal information are generally collected, depending on the need for service delivery:

- Contact details;
- Employment details;
- Educational background;
- Demographic Information;
- Course progress and achievement information; and
- Financial billing information.

The following types of sensitive information may also be collected and held:

- Identity details;
- Employee details & HR information;
- Complaint or issue information;
- Disability status & other individual needs;
- Indigenous status; and
- Background checks (such as National Criminal Checks or Working with Children checks).

Where MY FREIGHT CAREER PTY LTD collects personal information of more vulnerable segment of the community (such as children), additional practices and procedures are also followed. Please refer to MY FREIGHT CAREER PTY LTD's *Working with Children Policy and Procedures* for further information.

How personal information is collected

MY FREIGHT CAREER PTY LTD's usual approach to collecting personal information is to collect any required information directly from the individuals concerned. This may include the use of forms (such as registration forms, enrolment forms or service delivery records) and the use of web based systems (such as online enquiry forms, web portals or internal operating systems).

MY FREIGHT CAREER PTY LTD does receive solicited and unsolicited information from third party sources in undertaking service delivery activities. This may include information from such entities as:

- Governments (Commonwealth, State or Local);
- Australian Apprenticeships Centres;
- Employers (and their representatives), Job Network Providers, Schools, Guardians; and
- Service providers such as credit agencies and background check providers.

How personal information is held

MY FREIGHT CAREER PTY LTD's usual approach to holding personal information includes robust storage and security measures at all times. Information on collection is:

- As soon as practical converted to electronic means;
- Stored in secure, password protected systems, such as financial system, learning management system and student management system; and
- Monitored for appropriate authorised use at all times.

Only authorised personnel are provided with login information to each system, with system access limited to only those relevant to their specific role. MY FREIGHT CAREER PTY LTD ICT systems are hosted with robust internal security to physical server locations and server systems access. Virus protection, backup procedures and ongoing access monitoring procedures are in place.

Destruction of paper based records occurs as soon as practicable in every matter, through the use of secure shredding and destruction services at all MY FREIGHT CAREER PTY LTD sites.

Individual information held across systems is linked through a MY FREIGHT CAREER PTY LTD allocated identification number for each individual.

Retention and Destruction of Information

MY FREIGHT CAREER PTY LTD maintains a *Retention and Disposal Schedule* documenting the periods for which personal information records are kept.

Specifically for our RTO records, in the event of our organisation ceasing to operate the required personal information on record for individuals undertaking nationally recognised training with us would be transferred to the Australian Skills Quality Authority, as required by law.

Accessing and seeking correction of personal information

MY FREIGHT CAREER PTY LTD confirms all individuals have a right to request access to their personal information held and to request its correction at any time. In order to request access to personal records, individuals are to make contact with:

The MY FREIGHT CAREER PTY LTD Privacy Officer

1300 881 075

mail@myfreightcareer.com.au

A number of third parties, other than the individual, may request access to an individual's personal information. Such third parties may include employers, parents or guardians, schools, Australian Apprenticeships Centres, Governments (Commonwealth, State or Local) and various other stakeholders.

In all cases where access is requested, MY FREIGHT CAREER PTY LTD will ensure that:

- Parties requesting access to personal information are robustly identified and vetted;
- Where legally possible, the individual to whom the information relates will be contacted to confirm consent (if consent not previously provided for the matter); and

- Only appropriately authorised parties, for valid purposes, will be provided access to the information.

Complaints about a breach of the APPs

If an individual feels that MY FREIGHT CAREER PTY LTD may have breached one of the APPs please refer to the *Privacy Complaints Procedure* below for further information.

Making our APP Privacy Policy available

MY FREIGHT CAREER PTY LTD provides our APP Privacy Policy available free of charge, with all information being publicly available from the Privacy link on our website at www.myfreightcareer.com.au/privacy/.

In addition, this APP Privacy Policy is:

- Prominently displayed at each MY FREIGHT CAREER PTY LTD's premises;
- Included within our *company Handbooks*;
- Noted within the text or instructions at all information collection points (such as informing individuals during a telephone call of how the policy may be accessed, in cases where information collection is occurring); and
- Available for distribution free of charge on request, as soon as possible after the request is received, including in any particular format requested by the individual as is reasonably practical.

If, in the unlikely event the APP Privacy Policy is not able to be provided in a particular format requested by an individual, we will explain the circumstances around this issue with the requester and seek to ensure that another appropriate method is provided.

Review and Update of this APP Privacy Policy

MY FREIGHT CAREER PTY LTD reviews this APP Privacy Policy:

- On an ongoing basis, as suggestions or issues are raised and addressed, or as government required changes are identified;
- Through our internal audit processes on at least an annual basis;
- As a part of any external audit of our operations that may be conducted by various government agencies as a part of our registration as an RTO or in normal business activities; and
- As a component of each and every complaint investigation process where the complaint is related to a privacy matter.

Where this policy is updated, changes to the policy are widely communicated to stakeholders through internal personnel communications, meetings, training and documentation, and externally through publishing of the policy on MY FREIGHT CAREER PTY LTD's website and other relevant documentation (such as our RTO Handbooks) for clients.

Australian Privacy Principle 2 – Anonymity and pseudonymity

MY FREIGHT CAREER PTY LTD provides individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us in relation to a particular matter, whenever practical. This includes providing options for anonymous dealings in cases of general course enquiries or other situations in which an individuals' information is not required to complete a request.

Individuals may deal with us by using a name, term or descriptor that is different to the individual's actual name wherever possible. This includes using generic email addresses that do not contain an individual's actual name, or generic user names when individuals may access a public component of our website or enquiry forms.

MY FREIGHT CAREER PTY LTD only stores and links pseudonyms to individual personal information in cases where this is required for service delivery (such as system login information) or once the individual's consent has been received.

Individuals are advised of their opportunity to deal anonymously or by pseudonym with us where these options are possible.

Requiring identification

MY FREIGHT CAREER PTY LTD must require and confirm identification however in service delivery to individuals for nationally recognised course programs. We are authorised by Australian law to deal only with individuals who have appropriately identified themselves. That is, it is a *Condition of Registration* for all RTOs under the *National Vocational Education and Training Regulator Act 2011* that we identify individuals and their specific individual needs on commencement of service delivery, and collect and disclose Australian Vocational Education and Training Management of Information Statistical Standard (AVETMISS) data on all individuals enrolled in nationally recognised training programs. Other legal requirements, as noted earlier in this policy, also require considerable identification arrangements.

There are also other occasions also within our service delivery where an individual may not have the option of dealing anonymously or by pseudonym, as identification is practically required for us to effectively support an individual's request or need.

Australian Privacy Principle 3 — Collection of solicited personal information

MY FREIGHT CAREER PTY LTD only collects personal information that is reasonably necessary for our business activities.

We only collect sensitive information in cases where the individual consents to the sensitive information being collected, except in cases where we are required to collect this information by law, such as outlined earlier in this policy.

All information we collect is collected only by lawful and fair means.

We only collect solicited information directly from the individual concerned, unless it is unreasonable or impracticable for the personal information to only be collected in this manner.

Australian Privacy Principle 4 – Dealing with unsolicited personal information

MY FREIGHT CAREER PTY LTD may from time to time receive unsolicited personal information. Where this occurs we promptly review the information to decide whether or not we could have collected the information for the purpose of our business activities. Where this is the case, we may hold, use and disclose the information appropriately as per the practices outlined in this policy.

Where we could not have collected this information (by law or for a valid business purpose) we immediately destroy or de-identify the information (unless it would be unlawful to do so).

Australian Privacy Principle 5 – Notification of the collection of personal information

Whenever MY FREIGHT CAREER PTY LTD collects personal information about an individual, we take reasonable steps to notify the individual of the details of the information collection or otherwise ensure the individual is aware of those matters. This notification occurs at or before the time of collection, or as soon as practicable afterwards.

Our notifications to individuals on data collection include:

- MY FREIGHT CAREER PTY LTD's identity and contact details, including the position title, telephone number and email address of a contact who handles enquiries and requests relating to privacy matters;
- The facts and circumstances of collection such as the date, time, place and method of collection, and whether the information was collected from a third party, including the name of that party;
- If the collection is required or authorised by law, including the name of the Australian law or other legal agreement requiring the collection;
- The purpose of collection, including any primary and secondary purposes;
- The consequences for the individual if all or some personal information is not collected;
- Other organisations or persons to which the information is usually disclosed, including naming those parties;
- Whether we are likely to disclose the personal information to overseas recipients, and if so, the names of the recipients and the countries in which such recipients are located.
- A link to this APP Privacy Policy on our website or explain how it may be accessed; and
- Advice that this APP Privacy Policy contains information about how the individual may access and seek correction of the personal information held by us; and how to complain about a breach of the APPs, or any registered APP code, and how we will deal with such a complaint.

Where possible, we ensure that the individual confirms their understanding of these details, such as through signed declarations, website form acceptance of details or in person through questioning.

Collection from third parties

Where MY FREIGHT CAREER PTY LTD collects personal information from another organisation, we:

1. Confirm whether the other organisation has provided the relevant notice above to the individual; or
2. Whether the individual was otherwise aware of these details at the time of collection; and
3. If this has not occurred, we will undertake this notice to ensure the individual is fully informed of the information collection.

Australian Privacy Principle 6 – Use or disclosure of personal information

MY FREIGHT CAREER PTY LTD only uses or discloses personal information it holds about an individual for the particular primary purposes for which the information was collected, or secondary purposes in cases where:

- An individual consented to a secondary use or disclosure;
- An individual would reasonably expect the secondary use or disclosure, and that is directly related to the primary purpose of collection; or
- Using or disclosing the information is required or authorised by law.

Requirement to make a written note of use or disclosure for this secondary purpose

If MY FREIGHT CAREER PTY LTD uses or discloses personal information in accordance with an 'enforcement related activity' we will make a written note of the use or disclosure, including the following details:

- The date of the use or disclosure;
- Details of the personal information that was used or disclosed;
- The enforcement body conducting the enforcement related activity;
- If the organisation used the information, how the information was used by the organisation;
- The basis for our reasonable belief that we were required to disclose the information.

Australian Privacy Principle 7 – Direct marketing

MY FREIGHT CAREER PTY LTD does not use or disclose the personal information that it holds about an individual for the purpose of direct marketing, unless:

- The personal information has been collected directly from an individual, and the individual would reasonably expect their personal information to be used for the purpose of direct marketing; or
- The personal information has been collected from a third party, or from the individual directly, but the individual does not have a reasonable expectation that their personal information will be used for the purpose of direct marketing; and
- We provide a simple method for the individual to request not to receive direct marketing communications (also known as 'opting out').

On each of our direct marketing communications, MY FREIGHT CAREER PTY LTD provides a prominent statement that the individual may request to opt out of future communications, and how to do so.

An individual may also request us at any stage not to use or disclose their personal information for the purpose of direct marketing, or to facilitate direct marketing by other organisations. We comply with any request by an individual promptly and undertake any required actions for free.

We also, on request, notify an individual of our source of their personal information used or disclosed for the purpose of direct marketing unless it is unreasonable or impracticable to do so.

Australian Privacy Principle 8 – Cross-border disclosure of personal information

Before MY FREIGHT CAREER PTY LTD discloses personal information about an individual to any overseas recipient, we undertake reasonable steps to ensure that the recipient does not breach any privacy matters in relation to that information.

Australian Privacy Principle 9 – Adoption, use or disclosure of government related identifiers

MY FREIGHT CAREER PTY LTD does not adopt, use or disclose a government related identifier related to an individual except:

- In situations required by Australian law or other legal requirements;
- Where reasonably necessary to verify the identity of the individual;
- Where reasonably necessary to fulfil obligations to an agency or a State or Territory authority; or
- As prescribed by regulations.

Australian Privacy Principle 10 – Quality of personal information

MY FREIGHT CAREER PTY LTD takes reasonable steps to ensure that the personal information it collects is accurate, up-to-date and complete. We also take reasonable steps to ensure that the personal information we use or disclose is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant. This is particularly important where:

- When we initially collect the personal information; and
- When we use or disclose personal information.

We take steps to ensure personal information is factually correct. In cases of an opinion, we ensure information takes into account competing facts and views and makes an informed assessment, providing it is clear this is an opinion. Information is confirmed up-to-date at the point in time to which the personal information relates.

Quality measures in place supporting these requirements include:

- Internal practices, procedures and systems to audit, monitor, identify and correct poor quality personal information (including training staff in these practices, procedures and systems);
- Protocols that ensure personal information is collected and recorded in a consistent format, from a primary information source when possible;
- Ensuring updated or new personal information is promptly added to relevant existing records;
- Providing individuals with a simple means to review and update their information on an on-going basis through our online portal;
- Reminding individuals to update their personal information at critical service delivery points (such as completion) when we engage with the individual;
- Contacting individuals to verify the quality of personal information where appropriate when it is about to be used or disclosed, particularly if there has been a lengthy period since collection; and
- Checking that a third party, from whom personal information is collected, has implemented appropriate data quality practices, procedures and systems.

Australian Privacy Principle 11 — Security of personal information

MY FREIGHT CAREER PTY LTD takes active measures to consider whether we are able to retain personal information we hold, and also to ensure the security of personal information we hold. This includes reasonable steps to protect the information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

We destroy or de-identify personal information held once the information is no longer needed for any purpose for which the information may be legally used or disclosed.

Access to MY FREIGHT CAREER PTY LTD offices and work areas is limited to our personnel only - visitors to our premises must be authorised by relevant personnel and are accompanied at all times. With regard to any information in a paper based form, we maintain storage of records in an appropriately secure place to which only authorised individuals have access.

Regular staff training and information bulletins are conducted with MY FREIGHT CAREER PTY LTD personnel on privacy issues, and how the APPs apply to our practices, procedures and systems. Training is also included in our personnel induction practices.

We conduct ongoing internal audits (at least annually and as needed) of the adequacy and currency of security and access practices, procedures and systems implemented.

Australian Privacy Principle 12 — Access to personal information

Where MY FREIGHT CAREER PTY LTD holds personal information about an individual, we provide that individual access to the information on their request. In processing requests, we:

- Ensure through confirmation of identity that the request is made by the individual concerned, or by another person who is authorised to make a request on their behalf;
- Respond to a request for access:
 - Within 14 calendar days, when notifying our refusal to give access, including providing reasons for refusal in writing, and the complaint mechanisms available to the individual; or
 - Within 30 calendar days, by giving access to the personal information that is requested in the manner in which it was requested.
- Provide information access free of charge.

Australian Privacy Principle 13 – Correction of personal information

MY FREIGHT CAREER PTY LTD takes reasonable steps to correct personal information we hold, to ensure it is accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held.

Individual Requests

On an individual's request, we:

- Correct personal information held; and
- Notify any third parties of corrections made to personal information, if this information was previously provided to these parties.

In cases where we refuse to update personal information, we:

- Give a written notice to the individual, including the reasons for the refusal and the complaint mechanisms available to the individual;
- Upon request by the individual whose correction request has been refused, take reasonable steps to associate a statement with the personal information that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading;
- Respond within 14 calendar days to these requests; and
- Complete all actions free of charge.

Correcting at MY FREIGHT CAREER PTY LTD's initiative

We take reasonable steps to correct personal information we hold in cases where we are satisfied that the personal information held is inaccurate, out-of-date, incomplete, irrelevant or misleading (that is, the information is faulty). This awareness may occur through collection of updated information, in notification from third parties or through other means.

'Request for Records Access' Procedure

Individuals or third parties may at any stage request access to records held by MY FREIGHT CAREER PTY LTD relating to their personal information. The following procedure is followed on each individual request for access:

1. A request for access is provided by the requester, with suitable information provided to be able to:
 - a. Identify the individual concerned;
 - b. Confirm their identity; and
 - c. Identify the specific information that they are requesting access to.

This request may be in any form, or preferably using MY FREIGHT CAREER PTY LTDs *Records Access or Update Request Form*.

2. Upon receiving a request for access, MY FREIGHT CAREER PTY LTD then:
 - a. Confirms the identity of the individual or party requesting access;
 - b. Confirms that this individual or party is appropriately authorised to receive the information requested;
 - c. Searches the records that we possess or control to assess whether the requested *personal information* is contained in those records; and
 - d. Collates any personal information found ready for access to be provided.

Confirming identity

MY FREIGHT CAREER PTY LTD personnel must be satisfied that a request for personal information is made by the individual concerned, or by another person who is authorised to make a request on their behalf. The minimum amount of personal information needed to establish an individual's identity is sought, which is generally an individual's name, date of birth, last known address and signature.

When meeting the requesting party in person, identification may be sighted.

If confirming details over a telephone conversation, questions regarding the individual's name, date of birth, last known address or service details may be confirmed before information is provided.

3. Once identity and access authorisation is confirmed, and personal information is collated, access is provided to the requester within 30 calendar days of receipt of the original request. We will provide access to personal information in the specific manner or format requested by the individual, wherever it is reasonable and practicable to do so, free of charge.

Where the requested format is not practical, we consult with the requester to ensure a format is provided that meets the requester's needs.

4. If the identity or authorisation access cannot be confirmed, or there is another valid reason why MY FREIGHT CAREER PTY LTD is unable to provide the personal information, refusal to provide access to records will be provided to the requester, in writing. Our notification will include reason(s) for the refusal, and the complaint mechanisms available to the individual. Such notifications are provided to the requester within 30 calendar days of receipt of the original request.

'Request for Records Update' Procedure

Individuals or third parties may at any stage request that their records held by MY FREIGHT CAREER PTY LTD relating to their personal information be updated. The following procedure is followed on each individual request for records updates:

1. A request for records update is provided by the requester, with suitable information provided to be able to:
 - a. Identify the individual concerned;
 - b. Confirm their identity; and
 - c. Identify the specific information that they are requesting be updated on their records.

This request may be in any form, or preferably using MY FREIGHT CAREER PTY LTDs *Records Access or Update Request Form*.

2. Upon receiving a request for records update, MY FREIGHT CAREER PTY LTD then:
 - a. Confirms the identity of the individual or party to whom the record relates;
 - b. Searches the records that we possess or control to assess whether the requested *personal information* is contained in those records; and
 - c. Assesses the information already on record, and the requested update, to determine whether the requested update should proceed.

Assessing Update

MY FREIGHT CAREER PTY LTD personnel assess the relevant personal information we hold, and the requested updated information, to determine which version of the information is considered accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held.

This may include checking information against other records held by us, or within government databases, in order to complete an assessment of the correct version of the information to be used.

3. Once identity and information assessment is confirmed, personal information is:
 - a. Updated, free of charge, within 14 calendar days of receipt of the original request; and
 - b. Notified to any third parties of corrections made to personal information, if this information was previously provided to these parties.

4. If the identity of the individual cannot be confirmed, or there is another valid reason why MY FREIGHT CAREER PTY LTD is unable to update the personal information, refusal to update records will be provided to the requester in writing, free of charge, within 14 calendar days.

Our notification will include the reasons for the refusal and the complaint mechanisms available to the individual.

5. Upon request by the individual whose correction request has been refused, we will also take reasonable steps to associate a 'statement' with the personal information that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading. This statement will be applied, free of charge, to all personal information relevant across MY FREIGHT CAREER PTY LTD systems within 30 calendar days of receipt of the statement request.

Privacy Complaints Procedure

If an individual feels that MY FREIGHT CAREER PTY LTD has breached its obligations in the handling, use or disclosure of their personal information, they may raise a complaint. We encourage individuals to discuss the situation with their MY FREIGHT CAREER PTY LTD representative in the first instance, before making a complaint.

The complaints handling process is as follows:

1. The individual should make the complaint including as much detail about the issue as possible, in writing to MY FREIGHT CAREER PTY LTD:

MY FREIGHT CAREER PTY LTD Privacy Officer

mail@myfreightcareer.com.au

2. MY FREIGHT CAREER PTY LTD will investigate the circumstances included in the complaint and respond to the individual as soon as possible (and within 30 calendar days) regarding its findings and actions following this investigation.
3. Should after considering this response, if the individual is still not satisfied they make escalate their complaint directly to the Information Commissioner for investigation:

Office of the Australian Information Commissioner

www.oaic.gov.au

Phone: 1300 363 992

When investigating a complaint, the OAIC will initially attempt to conciliate the complaint, before considering the exercise of other complaint resolution powers.

4. Alternatively, if the complaint relates to a non-privacy matter, or should individuals choose to do so, a complaint may also be lodged with the ASQA complaints handling service for complaints against RTOs:

Australian Skills Quality Authority

www.asqa.gov.au

Phone: 1300 701 801

Data Breach Response Plan

Data breaches when they occur can be caused by a variety of factors, affect different types of personal information and give rise to a range of actual or potential harms to individuals and organisations.

Each breach will need to be dealt with on a case-by-case basis, undertaking an assessment of the risks involved, and using that risk assessment as the basis for deciding what actions to take in the circumstances.

There are four key steps to consider when responding to a breach or suspected breach:

1. Contain the breach and do a preliminary assessment.
2. Evaluate the risks associated with the breach.
3. Notification.
4. Prevent future breaches.

When dealing with any breach, some key items to consider include:

- Be sure to take each situation seriously and move immediately to contain and assess the suspected breach.
- Breaches that may initially seem immaterial may be significant when their full implications are assessed.
- Organisations should undertake steps 1, 2 and 3 promptly. In some cases it may be appropriate to notify individuals immediately, before containment or assessment of the breach occurs.
- The decision on how to respond should be made on a case-by-case basis. Depending on the breach, not all steps may be necessary, or some steps may be combined.

The following is an overview of our Data Breach Response Plan.

To be followed when personal information is lost or subjected to unauthorised access, modification, use or disclosure, or other misused

Data Breach Response Plan	
Step 1: Contain	<p>Contain the breach and make a preliminary assessment:</p> <ul style="list-style-type: none"> ▪ Take immediate steps to contain breach. ▪ Designate person/team to coordinate response.
Step 2: Evaluate	<p>Evaluate the risks for individuals associated with the breach:</p> <ul style="list-style-type: none"> ▪ Consider what personal information is involved. ▪ Determine whether the context of the information is important. ▪ Establish the cause and extent of the breach. ▪ Identify what is the risk of harm.
Step 3: Notify	<p>Consider breach notification:</p> <ul style="list-style-type: none"> ▪ Risk analysis on a case-by-case basis. ▪ Not all breaches necessarily warrant notification. ▪ Should notifications occur? <p>Where there is a real risk of serious harm, notification may enable individuals to take steps to avoid or mitigate harm. Consider:</p> <ul style="list-style-type: none"> - Legal/contractual obligations to notify. - Risk of harm to individuals (identity crime, physical harm, humiliation, damage to reputation, loss of business or employment opportunities). <ul style="list-style-type: none"> ▪ Process of notification: <ul style="list-style-type: none"> - When? As soon as possible. - How? Direct contact if possible (mail/phone). - Who? The affected individual. - What? Description of the breach, type of personal information involved, steps to help mitigate, contact details for information and assistance, other actions underway ▪ Should others be notified: <ul style="list-style-type: none"> - Australian Skills Quality Authority? - Office of the Australian Information Commissioner? - Police/Law Enforcement? - Other organisations affected by the breach or contractually required to notify?
Step 4: Prevent recurrence	<p>Review the incident and take action to prevent future breaches:</p> <ul style="list-style-type: none"> ▪ Fully investigate the cause of the breach. ▪ Consider developing a prevention plan. ▪ Option of audit to ensure plan implemented. ▪ Update security/ response plan. ▪ Make appropriate changes to policies and procedures. ▪ Revise staff training practices.

APP Personal Information Notice			
<p>Whenever MY FREIGHT CAREER PTY LTD collects personal information about an individual, we take reasonable steps to notify the individual of the details of the information collection or otherwise ensure the individual is aware of those matters. This notification occurs at or before the time of collection, or as soon as practicable afterwards.</p> <p>You are viewing or receiving this notice due to the impending or recent collection of your personal information.</p>			
RTO Name:	MY FREIGHT CAREER PTY LTD	RTO Id:	90489
Contact Details:	Privacy Officer - Phone: 1300 881 075 or eMail: mail@myfreightcareer.com.au		
Information Collection Facts & Circumstances			
Date:		Time:	
Method of Collection:	e.g. online form, enrolment form, received from third party	Place:	e.g. MY FREIGHT CAREER PTY LTD office location
Collection by Third Party:	Yes / No	Third Party Name:	
Authorisation for collection:	e.g. National VET Regulator Act 2011 – AVETMISS Data Collection		
Primary purpose of collection:	e.g. provision of course services and associated business activities		
Secondary purposes:	e.g. ongoing communications, direct marketing		
Consequences to you if some or all of the information is not collected:	e.g. refusal to accept enrolment into a course program, inability to provide accurate subsidy eligibility advice		
Disclosures <i>This information once collected is usually disclosed to the following parties:</i>			
Australian based	e.g. Governments (Commonwealth and State departments) as required, Australian Apprenticeships Centres, your Employer, your School		
We are likely to disclose information to the following overseas recipients			
Name of overseas recipient:		Country:	
Privacy Information and Advice MY FREIGHT CAREER PTY LTD APP Privacy Policy and associated procedures are available at www.myfreightcareer.com.au/privacy/ - also available in our Company Handbooks, at each MY FREIGHT CAREER PTY LTD office location and provided on request. This APP Privacy Policy contains information about how individuals may access and seek correction of the personal information held by us, and how to complain about a breach of the APPs, or any registered APP code, and how we will deal with such a complaint.			
In providing your personal information as requested and signing this notice, you are confirming your receipt of, and understanding of these details, and providing your consent for the collection, storage, use and disclosure of your personal information as outlined.			
Signature:		Date:	

Attachment 1 – Forms (continued)

Retention & Disposal Schedule				
System / Framework / Project / Area	Ref.	Description of Records	Status	Disposal Action
Category of records		Description of records class including examples of record types, activities or features	Permanent or Temporary	

Attachment 1 – Forms (continued)

Records Access or Update Request Form	
Requester Name:	
Contact Phone:	
Contact Email:	
Individual to whom this request relates <i>(whose personal information record do you wish to access or update)</i>	
Individual's Name:	
Date of Birth:	
Residential Address:	
Reason for access	If you are not the individual to whom the record relates, please outline your reason for requesting access and why you believe you are authorised to have access to the individual's personal information?
Records Access – I request access the following records:	
Information Description:	<i>Please describe the information you wish to be provided with</i>
Format Requested:	<i>What format / method would you like us to use to provide access to you?</i>
Reason for access	<i>If you are not the individual to whom the record relates, please outline your reason for requesting access and why you believe you are authorised to have access to the individual's personal information?</i>
Records Update – I request that the following records information is updated:	
Information Update Description:	<i>Please provide the updated information you wish to be applied to all personal information records we hold.</i>
<p>In making this request, I understand that MY FREIGHT CAREER PTY LTD will confirm the identity of parties involved in the request, assess the request made and either action or refuse my request within 30 calendar days. If refusing my request, MY FREIGHT CAREER PTY LTD will provide this notification in writing with further information on the reasons and options in that situation.</p> <p>I understand that any records updates will also be forwarded to any third parties that MY FREIGHT CAREER PTY LTD has previously provided the original information to, so that these parties may also update any relevant information.</p>	
Requester Signature:	Date:

Attachment 1 – Forms (continued)

Records Access Request – Refusal Notice

<<Requester Name>>

<<Requester Address / Contact Details>>

Dear <<Requester Name>>,

Notice of Refusal to Provide Access to Records

This notice is provided to advise that MY FREIGHT CAREER PTY LTD is refusing to provide access to personal information records as requested in your original request dated <<insert date>>.

We confirm the reason(s) for refusing your request for access to these records are due to the following:

<<include relevant from below>>

- MY FREIGHT CAREER PTY LTD does not hold the requested information;
- Access cannot be given in the manner requested in the original request, due to ...;
- The steps necessary to give access in a way that meets the needs of MY FREIGHT CAREER PTY LTD and the original request are not reasonable in the circumstances;
- MY FREIGHT CAREER PTY LTD reasonably believes that giving access would pose a serious threat to the life, health or safety of an individual, or to public health or public safety;
- Giving access would have an unreasonable impact on the privacy of other individuals;
- The original request for access is frivolous or vexatious;
- The information relates to existing or anticipated legal proceedings between MY FREIGHT CAREER PTY LTD and the individual, and would not be accessible by the process of discovery in those proceedings;
- Giving access would reveal the intentions of MY FREIGHT CAREER PTY LTD in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- Giving access would be unlawful;
- Denying access is required or authorised by or under an Australian law or a court/tribunal order;
- MY FREIGHT CAREER PTY LTD has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to MY FREIGHT CAREER PTY LTD's functions or activities has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
- Giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- Giving access would reveal evaluative information generated within MY FREIGHT CAREER PTY LTD in connection with a commercially sensitive decision-making process.

Should you wish to discuss this matter further, or adjust your request for records access, please contact our Privacy Officer at 1300 881 075 or mail@myfreightcareer.com.au.

Should you wish to raise a complaint regarding this process, I have attached our *APP Privacy Policy* and *Privacy Complaints Procedure*, that outline the various complaint options and procedures available to you.

Yours Sincerely,

<<Insert Name>>

<<Insert Position>>

MY FREIGHT CAREER PTY LTD

Attachment 1 – Forms (continued)

Records Update Request-Refusal Notice

<<Requester Name>>

<<Requester Address / Contact Details>>

Dear <<Requester Name>>,

Notice of Refusal to Provide Update to Records

This notice is provided to advise that MY FREIGHT CAREER PTY LTD is refusing to process an update to personal information records as requested in your original request dated <<insert date>>.

We confirm the reason(s) for refusing your request for update to these records are due to the following:

<<include relevant from below>>

- MY FREIGHT CAREER PTY LTD does not hold the personal information that the original request relates to;
- MY FREIGHT CAREER PTY LTD is satisfied that the personal information it holds is accurate, up-to-date, complete, relevant and not misleading having regard to the purposes for which it is held; or
- That the steps necessary to correct the information as requested are not reasonable in the circumstances.

Records Statement

As the request for update to these records has been refused, MY FREIGHT CAREER PTY LTD provides an option, should you request it, to require MY FREIGHT CAREER PTY LTD to associate a 'statement' with the personal information regarding your view of the information status. This statement may note your individual view that the information is considered to be inaccurate, out-of-date, incomplete, irrelevant or misleading.

Should you wish to have a records statement applied to the relevant personal information held by MY FREIGHT CAREER PTY LTD, adjust your request for records update, or to discuss this matter further in general, please contact our Privacy Officer at 1300 881 075 or mail@myfreightcareer.com.au.

Should you wish to raise a complaint regarding this process, I have attached our *APP Privacy Policy* and *Privacy Complaints Procedure*, that outline the various complaint options and procedures available to you.

Yours Sincerely,

<<Insert Name>>

<<Insert Position>>

MY FREIGHT CAREER PTY LTD