



# PRIVACY POLICY

DJ-POL-013

## 1 PURPOSE

Djeleanna is committed to managing personal information in an open and transparent way. This Privacy Policy explains how Djeleanna collects, holds, uses, discloses, stores, secures, accesses, corrects and otherwise handles personal information in connection with its website, business development, client services, workforce management, recruitment, contractor engagement, project delivery and related activities. This Privacy Policy is adopted by Djeleanna Pty Ltd and sets out how Djeleanna manages personal information in accordance with the *Privacy Act 1988 (Cth)*, the *Australian Privacy Principles* and, where applicable, the *Privacy and Responsible Information Sharing Act 2024 (WA) (PRIS Act)*, including the relevant Information Privacy Principles (IPPs) and contractual privacy obligations applicable to State services contracts.

## 2 OUR PRIVACY COMMITMENT

Djeleanna will take reasonable steps to implement practices, procedures and systems that help ensure compliance with privacy law, enable enquiries and complaints to be handled effectively, and protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. Djeleanna reviews this policy and its privacy controls periodically to keep them accurate and up to date.

## 3 PRIVACY GOVERNANCE AND COMPLIANCE

The Managing Director is responsible for approving this policy and ensuring appropriate governance and resourcing.

The Privacy Officer, or delegate, is responsible for maintaining this policy and related procedures, overseeing privacy complaints, access and correction requests, privacy incidents, training, registers and policy reviews.

Business unit leaders, contract owners, Human Resources, Information Technology, system owners and all personnel who handle personal information on behalf of Djeleanna must comply with this policy, use approved collection notices where required, complete required privacy training, and promptly report actual or suspected privacy incidents.

Djeleanna maintains procedures, registers and controls for:

- privacy complaints
- access and correction requests
- breach response and escalation
- retention, destruction and de-identification
- vendor due diligence
- offshore disclosure review
- privacy review of new systems, projects and contracts where required.

## 4 WESTERN AUSTRALIAN PRIVACY REQUIREMENTS

Where Djeleanna provides services to a Western Australian public sector entity under a State services contract that includes a provision of the kind referred to in section 129 of the *Privacy and Responsible Information Sharing Act 2024 (WA) (PRIS Act)*, Djeleanna will comply with the applicable Information Privacy



Principles (IPPs), any applicable approved privacy code of practice, any applicable notifiable information breach requirements, and any other privacy obligations applying under that contract.

These obligations apply only to the extent that Djeleanna handles personal information in connection with the relevant State services contract.

From 1 January 2027, where those obligations apply, Djeleanna will comply with the PRIS Act notifiable information breach regime, including by assessing suspected notifiable information breaches, notifying the relevant outsourcing entity as soon as practicable, providing that entity with the outcome of any assessment and any required report, and giving that entity any information and assistance reasonably required for notification to the Information Commissioner and affected individuals in accordance with the PRIS Act and the relevant State services contract.

## **5 WHAT PERSONAL INFORMATION WE COLLECT**

We may collect personal information that is reasonably necessary for our functions and activities, including:

- identity and contact details, such as your name, email address, phone number, postal or business address
- business and professional details, such as company name, role, project relationship, and business contact information
- communications and correspondence with us
- enquiry, tender, proposal, quote, contract and project-related records
- billing, payment and transaction information
- website and device information, such as IP address, browser type, referring pages, cookies, session data, and analytics information
- recruitment and workforce information, such as resumes, cover letters, qualifications, licences, tickets, references, right-to-work details, emergency contacts, payroll and superannuation details, and training records
- compliance, safety, security, site access or incident records
- login credentials, access logs or audit records for our systems, document portals or controlled environments.

We collect sensitive information only where reasonably necessary and permitted by law. Depending on the context, this may include health information, criminal history, racial or ethnic origin, or other sensitive information contained in job applications, safety records, insurance matters or regulatory processes. Please do not send us sensitive information unless it is specifically requested or reasonably necessary.

## **6 WHY WE COLLECT AND USE PERSONAL INFORMATION**

We collect, hold, use and disclose personal information where reasonably necessary for our functions and activities, including to:

- respond to enquiries and provide requested materials
- manage contracts, projects and service delivery
- administer client, supplier and subcontractor relationships
- recruit, onboard and manage personnel
- administer payroll, superannuation and workplace compliance
- manage site access, security, health, safety, environmental matters and incidents



- meet legal, regulatory and record-keeping obligations
- administer systems and operations
- undertake direct marketing where permitted by law.

We do not use or disclose personal information for unrelated purposes unless you consent or the use or disclosure is otherwise permitted or required by law.

## **7 HOW WE COLLECT PERSONAL INFORMATION**

We may collect personal information directly from you when you:

- contact us
- complete a website form
- request our capability statement
- submit an expression of interest
- apply for employment
- enter into a contract
- attend a site
- participate in inductions or training
- provide compliance documentation
- otherwise communicate with us.

We may also collect personal information from publicly available sources, referees, recruitment intermediaries, clients, subcontractors, service providers, and background or licence verification sources where lawful and reasonably necessary.

We collect personal information by lawful and fair means and, where practicable, directly from you. We provide collection notices where required and take reasonable steps, at or before collection or as soon as practicable afterwards, to notify you of relevant matters such as who we are, why we are collecting the information, access and complaint rights, and likely overseas disclosures where applicable.

## **8 PERSONAL INFORMATION ABOUT OTHERS**

If you provide personal information about another person to Djeleanna, you must take reasonable steps to ensure that the person understands that you have provided their information to us and that they can access this Privacy Policy. Where reasonably required, Djeleanna may ask you to confirm that you were authorised to provide the information.

## **9 UNSOLICITED PERSONAL INFORMATION**

If Djeleanna receives personal information that it did not solicit, it will determine whether it could lawfully have collected that information under APP 3. If it could not have done so, and the information is not required to be retained by law and is not contained in a Commonwealth record, Djeleanna will destroy or de-identify the information as soon as practicable if lawful and reasonable to do so.

## **10 DISCLOSURE OF PERSONAL INFORMATION**

Djeleanna may disclose personal information where reasonably necessary for the purposes described in this policy, including to related bodies corporate of Djeleanna, where applicable, clients, principal contractors, subcontractors, professional advisers, insurers, payroll and IT service providers, recruitment and reference-checking providers, regulators, law enforcement bodies, courts or tribunals, and others where required or



authorised by law. We will not sell personal information. We will only disclose personal information beyond the primary purpose of collection where you have consented, where the disclosure is within your reasonable expectations and permitted by law, or where another lawful exception applies.

## **11 DIRECT MARKETING**

Where permitted by law, we may use your name, job title, employer, business contact details and interaction history to send updates about our services, projects, capability materials or opportunities.

We do not use sensitive information for direct marketing without required consent. Where marketing is sent by email, SMS or similar electronic message, we will comply with applicable e-marketing laws, including consent, sender identification and unsubscribe requirements.

You may opt out at any time using the unsubscribe function or by contacting us using the details below. We will action opt-out requests within a reasonable period.

## **12 STORAGE, SECURITY AND QUALITY OF INFORMATION**

We may hold personal information in paper files, electronic systems, operational databases, cloud platforms, emails, security systems and backup environments, whether managed internally or by service providers.

We take reasonable technical and organisational steps to protect personal information, including measures such as:

- role-based access controls
- password controls
- segregation of duties
- secure storage
- encryption
- endpoint controls
- secure transfer methods
- logging and monitoring
- confidentiality obligations
- vendor due diligence
- breach response planning
- secure disposal practices.

Where Western Australian privacy obligations apply under a State services contract, our breach response processes also address assessment, containment, mitigation, escalation and support for notification of notifiable information breaches in line with the PRIS Act and applicable contractual requirements.

We also take reasonable steps to ensure the personal information we collect, use and disclose is accurate, up to date, complete and relevant. Please contact us if your details change or you believe the information we hold is inaccurate.

## **13 OVERSEAS DISCLOSURES OF PERSONAL INFORMATION**

Djeleanna may disclose personal information to overseas recipients where such disclosure is reasonably necessary for its functions or activities, including where Djeleanna uses offshore-hosted technology platforms, cloud service providers, communications providers, backup providers, recruitment or support service providers, or international professional advisers.



Where practicable, Djeleanna will identify the relevant countries in its collection notices and this Privacy Policy. Before making a cross-border disclosure, Djeleanna will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles (APPs) in relation to the information and will implement contractual and operational safeguards proportionate to the risks involved. In many cases, Djeleanna will remain accountable under section 16C of the Privacy Act for the acts or practices of the overseas recipient.

## **14 ACCESS AND CORRECTION OF INFORMATION**

You may request access to the personal information Djeleanna holds about you, and you may request correction of information that is inaccurate, out of date, incomplete, irrelevant or misleading. Djeleanna may require identity verification before processing a request and will handle requests in accordance with its documented privacy request procedure. Djeleanna will respond within a reasonable period and, as a general operational standard, aims to respond within 30 calendar days. If we refuse access or correction, we will provide written reasons to the extent required by law, explain complaint options, and, where correction is refused, tell you how to request that a statement be associated with the information. We do not charge a fee for making a correction request. Any charge for access will not be excessive and will not be used to discourage requests.

## **15 COMPLAINTS**

If you believe Djeleanna has breached the *Privacy Act 1988 (Cth)*, the PRIS Act where applicable, or otherwise mishandled your personal information, you may lodge a complaint using the contact details below.

Please provide enough detail to help us investigate. We will acknowledge the complaint promptly and aim to provide a substantive response within 30 calendar days, unless the matter is complex or more time is reasonably required.

Where a complaint relates to Djeleanna's handling of personal information under a Western Australian State services contract to which the PRIS Act applies, Djeleanna will also cooperate with the relevant outsourcing entity and any applicable process of the Western Australian Information Commissioner, to the extent required by law or contract.

## **16 PROTECTING YOUR IDENTITY**

Where lawful and practicable, we will give individuals the option of dealing with us anonymously or using a pseudonym, such as when making a general enquiry. However, this may not be practicable for employment applications, contractor onboarding, contract administration, payroll, work health and safety, incident response, access requests, or where we are required by law to identify you.

Djeleanna will not adopt, use or disclose government-related identifiers except as permitted by law.

## **17 LINKS TO OTHER WEBSITES**

Our website may contain links to third-party websites or services. Those third parties are responsible for their own privacy practices, and we encourage you to review their privacy policies.

## **18 CHANGES TO THIS PRIVACY POLICY**

Djeleanna may amend this Privacy Policy from time to time to reflect changes in law, technology, business practices, service providers or operational processes. This policy will be reviewed at least annually and



whenever there is a material change in law, operations, systems, service providers, contractual obligations or privacy risk. Djeleanna will maintain appropriate records to demonstrate compliance with applicable privacy obligations.

## 19 CONTACT US

For any privacy-related queries, concerns or complaints, please contact us using the details set out below. We will make reasonable efforts to respond promptly and address your concerns in a thorough and appropriate manner.

**Djeleanna Pty Ltd (ABN: 88 658 017 442 / ACN: 658 017 442)**

Phone: [\(08\) 6285 3185](tel:(08)62853185)

Email: [info@djeleanna.com.au](mailto:info@djeleanna.com.au)

Address: Perth Office: 20 Wickham Street, East Perth, WA, 6004

Kimberly Slattery

**Managing Director**

Expiry Date: 30-04-2027