

# Privacy Policy

Onsite Rental Group Limited  
Level 1, 83 Egerton Street, Silverwater NSW 2128

Document owner: Legal  
Document No: HRM-PCY-23  
Version: 4.0  
Date issued: August 2022

## CONTENTS

1. Purpose.....	3
2. Scope .....	3
3. Defined Terms .....	3
4. Information collected .....	4
5. Applicant and Contractor Records .....	5
6. Surveillance and Monitoring .....	6
7. Information collected through Online Platforms.....	7
8. Security of Personal Information .....	7
9. Use and Disclosure.....	7
10. Access and Correction.....	9
11. Complaints and concerns .....	9
12. Relevant Guidelines and Legislation.....	10
13. References .....	

Onsite Rental Group Limited ACN 126 396 852

## 1. Purpose

- 1.1 Onsite Rental Group and its related entities ("Onsite") respects the privacy rights of all individuals in the workplace and is dedicated to maintaining high standards when it comes to your privacy and all participants in Onsite workplaces.
- 1.2 Onsite manages your privacy pursuant to the *Privacy Act 1988* (Cth) ("the Act") and the Australian Privacy Principles ("APPs") established under the Privacy Act. The APPs which set out principles and standards, rights and obligations in relation to Onsite's handling, holding, accessing and correcting personal information.
- 1.3 A copy of the APPs may be obtained from the website of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).
- 1.4 This policy explains how Onsite manages Personal Information Onsite holds about you.

## 2. Scope

- 2.1 This policy applies to all employees, contractors and candidates for employment.

## 3. What Is Personal Information

- 3.1 The Personal Information identifies a person and can be sensitive in nature. It can include your name, address, telephone number, email address and health information. Onsite understands you may have concerns about your Personal Information that Onsite may have or obtain. Your privacy will be treated with sensitivity, respect and in accordance with the law.
- 3.2 You may deal with Onsite anonymously except where it is impracticable or where Onsite is required by law to deal with identified individuals. Any access to Onsite's Employee Assistance Program remains anonymous.

## 4. Information collected

- 4.1 Onsite collects Personal Information which is reasonably necessary for its functions and activities. When Onsite collects Personal Information it will, where appropriate and possible, explain to you why Onsite is collecting the information and how it will be used. The Personal Information collected may include, your name, physical location or address, email address, telephone number, fax number and health information.
- 4.2 Personal information is obtained in many ways including via Onsite's:
- (a) Recruitment process - receiving job applications, resumes, reference checks, pre-employment medicals etc.
  - (b) Employment process – employment contract, employment pack (payroll details form, and emergency contact details form);
  - (c) Information requested by third parties (e.g. regulatory bodies, public health bodies and officers, insurers);
  - (d) Website – job or business enquires, feedback, complaints;
  - (e) By telephone;
  - (f) professional advisors, government and law enforcement agencies;
  - (g) information collected on check-in/sign-in registers which may be used for contact tracing purposes.
- 4.3 As part of collecting Personal Information, Onsite is determined to maintain a safe and healthy environment for all participants. Onsite is also conscious of its obligations to comply with all public health orders and public health advice as well as to keep all participants informed and aware of COVID-19 related risks when attending at a branch, site or other Onsite-affiliated location.
- 4.4 Employee Records are defined under the Act as Personal Information relating to your employment. Employee records are exempt from the Act if it relates to your current or former employment with Onsite. Employee records include Personal Information regarding:
- (a) engagement, training, discipline and termination;
  - (b) personal and emergency contact details;
  - (c) performance or conduct;
  - (d) managing time and attendance, location, salary, wages, conditions;
  - (e) trade association or union membership;
  - (f) leave entitlements; and taxation, banking or superannuation

## 5. Applicant and Contractor Records

- 5.1 Personal Information provided to Onsite during any recruitment process may be used by Onsite to consider you for current and future employment as an employee or contractor. Onsite may disclose your Personal Information that you provide to Onsite external advisors to assist Onsite in the selection and recruitment process.
- 5.2 If your application is unsuccessful, the Act will apply to any Personal Information that Onsite collects, holds and discloses about you. Onsite may retain this information for a reasonable period, for example to enable Onsite to contact you in relation to other employment or contracting opportunities that you may be interested in.
- 5.3 If you are or become one of Onsite's employees, Onsite may collect Personal Information including reference reports and other information about you. Onsite will not disclose your Personal Information for any other purpose, other than as required or authorised by law or to manage your employment relationship with Onsite.
- 5.4 If you are engaged by Onsite as a contractor, the Act will apply to any Personal Information that Onsite collects, uses, holds and discloses about you. The types of Personal Information Onsite may collect include (but are not limited to):
  - (a) Your contact and identification details such as your name, address, date of birth, telephone number and email address;
  - (b) your banking details and tax details (including your ABN if applicable);
  - (c) contact and identification details of any third party that you have authorised to negotiate on your behalf;
  - (d) any correspondence between you and Onsite; and
  - (e) any other personal information you provide when you make an enquiry, request information, correspond with Onsite or make a complaint.
- 5.5 The employee records exemption under the Act will not apply where an employment relationship has not yet been established.

## 6. Surveillance and Monitoring

- 6.1 Onsite undertakes workplace surveillance and monitoring in relation to electronic communications, computer (including tablets and laptops), Security cameras, phones and tracking primarily for the purpose of ensuring compliance, time and attendance, safety, audit or investigative purposes.
- 6.2 Monitoring, surveillance and tracking is continuous, however, access to the data and Personal Information will only be by authorised Onsite personnel (including IT, General Counsel and Human Resources) for legitimate business purposes including internal enquiries and investigations, for use in legal proceedings, disclosure to a law enforcement agency or where otherwise authorised by law to do so.
- 6.3 The monitoring, access and disclosure of information stored on Onsite computer systems may include (but is not limited to) incoming and out-going emails, recorded telephone messages, access and use of the Internet and information stored on Onsite's individual computer systems or network attached storage.

### **Computers**

- 6.4 By accessing Onsite's computer systems (including through Onsite supplied computers, tablets, laptops and phones), you acknowledge Onsite's right to monitor your use of its computer systems and that you have no expectation of privacy in the communications or information sent, received or stored on Onsite's computer systems.
- 6.5 Monitoring may include a routine review of information of records to ensure integrity, security and service delivery of Onsite's systems.

### **Telephones**

- 6.6 Onsite may record telephone conversations. Under the Privacy Act, Onsite will tell you at the beginning of a call if your call is to be monitored or recorded. This is so you can have the opportunity to provide your consent, or alternatively to end the call or ask to be transferred to another line where monitoring or recording does not take place.

### **Tracking Devices**

- 6.7 Onsite may use tracking devices on Onsite motor vehicles and assets. The primary purpose of a tracking device is to determine the location of an employee or asset. The use of tracking is subject to each State and Territory legislation.
- 6.8 Onsite also uses a time and attendance digital platform through finger vein authentication. The primary purpose of this technology is to electronically record time and attendance and may also be used to record location of the employee through mobile devices.

### **Camera Surveillance**

- 6.9 Onsite may utilise camera surveillance within Onsite workplaces primarily for the safety and security of Onsite's employees, contractors and assets. Cameras are not covered or hidden and may monitor activities on an on-going and continuous basis. Surveillance will not be undertaken in any private workplace area such as bathrooms.
- 6.10 Onsite employees and contractors consent to workplace surveillance and monitoring. Onsite may access, use, or disclose Personal Information in the course of surveillance or monitoring.
- 6.11 Employees are prohibited from conducting any workplace surveillance or from accessing any monitoring or surveillance records except authorised employees.
- 6.12 Onsite will not distribute any Personal Information obtained through surveillance or monitoring unless arising out of a lawful requirement such as required by law or for internal audit or investigative purposes.

## 7. Information collected through Online Platforms

- 7.1 Some information collected by Onsite during your visit to Onsite's online platforms are not Personal Information as it does not reveal your identity. For example, Onsite may record the date and time of your visit or the pages you visited Onsite.
- 7.2 If collected, this information will be used and disclosed by Onsite in anonymous, aggregated form only, for purposes including statistical analysis and Onsite web development. However, Onsite reserves its right to use or disclose this information to try to locate an individual where Onsite reasonably believes that the individual may have engaged in any unlawful or inappropriate activity in connection with our Online Platforms, or where Onsite is otherwise required or authorised by law to do so.
- 7.3 Onsite's websites have electronic security systems in place, including the use of firewalls and data encryption. Onsite takes care to store your information in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.
- 7.4 However, no data transmission over the internet can be guaranteed to be totally secure. As a result, while Onsite strives to protect users' personal information, Onsite cannot guarantee or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once Onsite receives your information, Onsite make every effort to ensure its security on our systems. If you are concerned about sending your information over the internet, you can contact Onsite by telephone, email or post.

## 8. Security of Personal Information

- 8.1 Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.
- 8.2 When your Personal Information is no longer needed for the purpose for which it was obtained, Onsite will take reasonable steps to destroy or permanently de-identify your Personal Information. However, employee records that contain Personal Information and most other Personal Information will be stored in a secure location and kept for a minimum of 7 years, as required by law.
- 8.3 Onsite may store your personal information in different ways, including in hardcopy and electronic form.
- 8.4 Onsite does not sell, rent or trade personal information to or with third parties. Onsite does not accept responsibility for the misuse of personal information by third parties.

## 9. Use and Disclosure

- 9.1 Onsite adopts the APPs when providing information about Onsite's employees or participants Onsite to third parties. Only authorised personnel including Human Resources, IT and General Counsel are permitted to access, use and/or disclose Personal Information for the particular purpose for which it was collected or where:
  - (a) the participant has consented (e.g. where a third party has requested Personal Information)
  - (b) or where the participant would reasonably expect the use or disclosure
  - (c) the use or disclosure is required under Australian Law (including a public health order) or an order by a court/tribunal
  - (d) any other permitted use or disclosure pursuant to the APPs
  - (e) Personal Information may be used and/or disclosed by overseas recipients and Onsite takes reasonable steps to ensure all overseas recipients comply with the APPs.

- 9.2 Employee Records are collected by Onsite primarily for the following purposes, to ensure:
- (a) Onsite and any employees, candidates and contractors are meeting their obligations under relevant legislation as well their contract of employment:
  - (b) Onsite and any employees, candidates and contractors are meeting their obligations under relevant legislation as well their contract of employment
  - (c) To investigate and respond to any employee claims
  - (d) To conduct pre-employment and on-going employment criminal and license checks
  - (e) To analyse employee data to determine performance, service levels and targets.
  - (f) to collect, process and maintain employee attendance records and working hours;
  - (g) the health, safety and welfare of all employee, candidates and contractors at times when they are performing work for Onsite
  - (h) allowing appropriate insurance coverage for these employees, contractors and candidates
  - (i) to respond to any enquiry and concern and communicate with you about Onsite's business and your relationship with Onsite;
  - (j) take any action Onsite is required to take by law.
- 9.3 If you are a Contractor, Onsite may use your Personal Information:
- (a) in order to manage and administer Onsite engagement of you as a contractor;
  - (b) to communicate with you about your relationship with Onsite;
  - (c) to update Onsite's records and keep your contact details up to date;
  - (d) to do anything which you authorise or consent Onsite doing; or
  - (e) take any action Onsite is required or authorised by law to take.
- 9.4 Onsite may disclose your Personal Information to other entities in connection with the purpose for which the Personal Information was collected. If this is the case, Onsite will require (where possible) that those entities manage your Personal Information in accordance with the Privacy Act. Where other entities require Personal Information that concerns the health information of a participant (for purposes concerning or relating to COVID-19), the participant's consent will be sought prior to the disclosure of that Personal Information).
- 9.5 In limited circumstances, Onsite may need to disclose Personal Information about former or current employees in accordance with the Act and where requested by:
- (a) A Fair Work Inspector – in order to establish that the Onsite is meeting its employment obligations.
  - (b) Government agencies – such as the Australian Taxation Office, Child Support Agency
  - (c) A recruitment firm or another employer regarding a reference check – only to confirm information that relates directly to the employment relationship.
  - (d) Workers compensation insurers and other claims officers for investigative purposes;
  - (e) Personal Information will only be used and disclosed by Onsite as allowed by APPs.



## 10. Access and Correction

- 10.1 It is important that your Personal information held by Onsite is complete, accurate and current. Onsite may request from time to time that you tell Onsite of any changes to your Personal Information.
- 10.2 Alternatively, if you believe Your Personal Information held by Onsite is inaccurate, out-of-date, incomplete, irrelevant or misleading and needs to be corrected or updated, please contact Onsite at the details set out below. If Onsite corrects any Personal Information it holds about you, you may request Onsite to notify third parties of the correction.
- 10.3 You may ask to obtain access to your personal information that Onsite holds by contacting Onsite at the contact details below. Onsite will endeavour to provide, within a reasonable time, suitable means of accessing your personal information (such as by mailing or emailing it to you). Onsite is not required to provide access to your employee records however it may do so at its discretion.
- 10.4 Onsite will not charge you for accessing your personal information, however, a fee may be charged in some circumstances to cover the costs of providing you with access to your personal information, (for example, if you make multiple requests for information, the information requested is voluminous or Onsite incurs third party costs in providing you with access to your Personal Information).
- 10.5 Onsite may not be required to provide you with access or correct Your Personal Information under some circumstances in the Privacy Act (for example, if providing access would be unlawful or would have an unreasonable impact upon the privacy of other individuals).
- 10.6 Also, Onsite may not be able to require other entities to provide access to Personal Information about you. If Onsite decides not to provide you with access to or correct your Personal Information, Onsite will give you its reasons. Where Onsite does not agree that there are grounds for amendment of your Personal Information then Onsite will (if you request) add a note to the Personal Information stating that you disagree with it.

## 11. Complaints and concerns

- 11.1. All privacy enquiries should be directed to Onsite's privacy officer as follows:

Senior Legal Counsel  
Onsite Rental Group Operations Pty Limited  
Level 1, 83 Egerton Street  
SILVERWATER NSW 2128  
Tel: 02 8203 9256  
Email: [banipal.sulaiman@onsite.com.au](mailto:banipal.sulaiman@onsite.com.au)

- 11.2 If you are not satisfied with how your complaint is handled, then you may lodge a formal complaint with the Office of the Australian Information Commissioner at:

**Telephone:** 1300 363 992 (if calling from outside Australia or from Norfolk Island please call: +61 2 9284 9749)

**National Relay Service:**

TTY users phone 133 677 then ask for 1300 363 992 o Speak and Listen users phone 1300 555 727 then ask for 1300 363 992 o Internet relay users connect to the National Relay Service then ask for 1300 363 992

**Post:** Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001

**Fax:** +61 2 9284 9666

**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**Website:** <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

## 12. Relevant Guidelines and Legislation

Office of the Australian Information Commissioner - APP Guidelines – March 2015

Best Practice Guide Workplace Privacy – Fair Work Ombudsman

*Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs)

*Surveillance Devices Act 1999* (Vic)

*Surveillance Devices Act 1998* (WA)

*Surveillances Devices Act 2007* (NT)

*Workplace Surveillance Act 2005* (NSW)

*Listening and Surveillance Devices Act 1972* (SA)