

POL04 Privacy Policy

London Associati Ltd (Certifications) is an entity under UE Regulation GDPR (Privacy Act). As an entity under the Privacy Act, *London Associati Ltd* Certifications ensures that all personal information is managed according to current legislation.

London Associati Ltd Certifications fosters a culture of privacy, and treat all personal information gathered as part of audit and other activities as a valuable business asset to be respected, managed and protected. With this in mind *London Associati Ltd* Certifications takes all reasonable steps to manage personal information in an open, secure and transparent manner. The company has a designated privacy officer who manages all privacy matters.

This Privacy Policy is available on the *London Associati Ltd* Certifications website and is on public display. All clients and prospective clients of *London Associati Ltd* Certifications receive our Privacy Policy.

Personal and sensitive information collected by *London Associati Ltd* Certifications includes:

- Contact details, such as name, address, phone numbers and email address;
- Personal details, such as date of birth, gender, employment history, educational qualifications;
- Photos, videos and other reasonably identifiable electronic media;
- State or Organizational generated personal identifiers;
- Memberships and registrations with professional bodies;
- Any current conflicts of interest including information about an individual's membership or leadership of an Association or Company;
- Bank account, credit card and other financial details;
- Details of complaints or requests to access information.

Collection of solicited sensitive personal information

Sensitive personal information includes:

- Medical or Health information;
- Racial or ethnic origin;
- Religious affiliation.

London Associati Ltd Certifications collects information from an individual or company by way of:

- Required company forms and e-forms, for example personal onboarding information, audit certification registration, audit schedules and participant lists, contractor tax details and invoices etc. Meetings, interviews or telephone calls minute with an individual or company representative;
- Business cards received from an individual or company representative;
- Registration details for online information or e-newsletters provided by an individual or company representative;
- Website access where this privacy policy is located or linked; and

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- Publicly available records.

London Associati Ltd Certifications also collects personal information:

- Through Auditor contractors who perform audit services, such as - during the delivery of an audit activity, gathering and viewing relevant information to complete reports, interviewing participants, families, advocates and staff of Organizations to verify compliance;
- To meet the requirements of specific standards and regulatory frameworks; and

Collection of solicited information for children or vulnerable individuals

- Personal and sensitive information is only collected for some certifications audit activities;
- All information collected uses client generated codes to preserve individual anonymity;
- All information collected, in electronic or hard copy, is kept in password protected files; and

Consent to collect, hold, use, disclose and dispose of personal information

London Associati Ltd Certifications uses all reasonable means to seek consent from individuals or companies involved in audit or business activities to collect, hold, use, disclose and dispose of personal and sensitive information that is reasonably identifiable under the Privacy Regulations. Consent will be sought in writing wherever possible, or verbally where the individual may be witnessed by an identified advocate or person responsible.

Use and of personal information

London Associati Ltd Certifications takes all reasonable steps to ensure that all personal information held in electronic or hard copy is only used for the following circumstances:

- Workforce management and planning;
- Contract management;
- Audit activities;
- Reporting activities;
- Emergency and crisis management;
- Mandatory reporting and other regulatory or legislative requirements;
- Risk management;
- Gathering research data for internal measurement and sector development; and
- Quality control activities.

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Disclosure of personal information

London Associati Ltd Certifications has a process available for an individual or a regulatory agency to make an access request.

London Associati Ltd certifications discloses personal information in the following circumstances:

- Identity of the individual who requests to access own information is verified;
- Request from a verified officer of a government agency for the purposes of mandatory reporting, other illegal conduct or fraud.

London Associati Ltd Certifications will not adopt a government related identifier of an individual as an internal identifier for business or audit activities, or use or disclose a government related identifier at any time.

Security and protection of personal information

London Associati Ltd Certifications takes all reasonable steps to protect and secure the personal information held from misuse, interference, loss and from unauthorized access, modification and disclosure.

London Associati Ltd Certifications also takes all reasonable steps to destroy and de-identify personal information held once it is no longer required for business and audit purposes.

All personal information collected by *London Associati Ltd* Certifications is held electronically on *London Associati Ltd* Certifications secure information systems of Secured personal information can only be accessed by authorized employees with password controls. Contractors who require personal information access for client audit activities will have time limited access only.

All employees and contractors, committee members and the board undertake induction and annual training in the *London Associati Ltd* Certifications Privacy Policy and procedures to promote a culture of privacy and maximize the protection of individual and sensitive information.

Personal information is held in hard copy in some instances. Hard copy information is protected in locked cabinets accessed by authorized employees and contractors only. Access to hard copy personal information for contractors is limited to the audit activities they are contracted to deliver.

De-identification and destruction of personal information

Personal or sensitive information gathered about client's participants (including children and vulnerable persons) and employees as part of audit activities, will be de-identified at all times and will be destroyed or deleted within 30 days of *London Associati Ltd* Certifications granting certification to a client. Some personal information may be held for business purposes only including employee and contractor information.

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Anonymity and pseudonymity

London Associati Ltd Certifications, in order to verify evidence for certification frameworks, will make available options for anonymity to clients' participants (customers), employees, volunteers and other parties who will be required to supply personal and some sensitive data during audit activities.

Unsolicited information

London Associati Ltd Certifications does not use direct marketing processes or disclose personal or sensitive information to any overseas parties or Organizations. From time to time unsolicited information can be received by employees and contractors in the course of audit activities. Unsolicited information is maintained securely in the same manner as all other information and follows our strict digital and document processes.

Quality of personal information

London Associati Ltd Certifications will take reasonable steps to ensure that all personal information collected during business or audit activities is accurate, current and complete.

In any exceptional circumstances requiring disclosure of personal or sensitive information, *London Associati Ltd* Certifications will ensure that all reasonable steps are taken to disclose the most current information that is available. This includes contacting the client or individual to obtain current information, as required.

Requests for access to personal information

London Associati Ltd Certifications is committed to open and transparent information management. As such we support any individual who requests access to any personal information held by our company.

London Associati Ltd Certifications has a process in place that ensures:

- Requests can be made in person, by phone or in writing including email;
- Each request is documented by the designated privacy officer;
- Each individual identity is verified by the privacy officer using current identity documents or persons responsible in specific cases;
- The privacy officer will control all information retrieval and will send all communications to the

individual in their preferred manner;

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- The privacy officer will be responsible to maintain information confidentiality and security,
- All requests will be responded to and responses will be in writing and signed by the Executive Manager;
- Any information contained in documents held that identify other persons or other non-relevant information will have that information deleted;
- Where a person requests that their information be changed in any way the same process will be followed;
- The requesting individual will be given information on making an internal and external complaint about any decision made at the time of the request and in the formal response letter; and
- In any case of complaint an external mediator will be appointed to maintain impartiality.

Reviews and revisions

London Associati Ltd Certifications reviews its Privacy Policy annually or as required by regulatory changes. *London Associati Ltd* Certifications also reserves the right to change its Privacy Policy at any time. Notifications about changes to this Privacy Policy will be emailed to all stakeholders and an updated version posted prominently on our website.