

## Privacy Statement in Full

The Lucidity Privacy Statement informs what personal and sensitive information we collect, how we use, protect and store the data and your rights to view, correct or change it.

The Office of the Australian Information Commissioner <http://www.oaic.gov.au> provides further details of the Australian Privacy Act 1998 and how it protects personal information in Australia.

The Office of the New Zealand Privacy Commissioner <https://www.privacy.org.nz> provides further details of the New Zealand Privacy Act 2020 and how it protects personal information in Australia.

Lucidity's Data Privacy Officer is the Director of Technology DoT reporting to the Executive Team on information security and privacy compliance.

Lucidity does not collect nor retain any information held on the Lucidity platform by a subscriber.

## Obligations of Lucidity clients

The Lucidity product is a software platform made available to organisations (subscribers) to facilitate the management of their data which may contain personal or sensitive information. It is solely the responsibility of the organisation (subscriber) for compliance to the Privacy Acts of Australia and New Zealand (including the APPs and IPPs) as it applies to data collection, access, use, storage and security of any personal private or sensitive data within their control.

Personal or sensitive information that may be collected and stored within the Lucidity platform by subscribers typically include:

- Training and induction records including those of contractors. Competencies, licences, qualifications and permits - details entered + scanned copies attached.
- Name and DOB or other identifier as determined by the client and held in ACCESS and HR Modules for permissions to access Lucidity.
- Naming persons involved in incidents [Incident Module] including witnesses to incident when the name is attached to an employer or other identifier.
- Names attached to minutes and electronic signatures [Inform Module] that are traceable to a worksite or employer.
- Contractor's naming employees within the Contractor Module.
- Site location identifier tracking of workers on site.

## Obligations of Lucidity

Lucidity as a business entity provides the Lucidity software platform and initiates platform security in compliance with ISO 27001: 2013 Information security certified management system [Certificate No: 681119157561].

### **Lucidity obligations in meeting the Australian Privacy Principles APPs and New Zealand Information Privacy Principles IPPs**

Purpose of open and transparent management of personal information – Reference Aust APP #1 and NZ IPP #1

As an organisation, Lucidity complies with the Privacy Acts of Australia and New Zealand (including the APPs and IPPs) for the management of its privacy and sensitive business information.

Lucidity will not share privacy or sensitive information we collect with any third parties apart from those where regulatory requirements must be met. This includes any encrypted data according to the Australian access and assistance Law.

Anonymity, pseudonymity and unique identifiers – Reference Aust APP #2 and NZ IPP #13

Lucidity does not deal with the collection of any personal information that requires the need for or could be of any use if anonymity or pseudonymity is practiced. However, Lucidity does encrypt archived or at rest data as a normal business practice.

Information Lucidity collects and retains – Reference Aust APP #3 and NZ IPP #3

Lucidity requests personal information on their website only for the purposes of recontact at the request of the individual supplying the information. Names and emails with/without phone numbers are held in HubSpot under 2F authentication for a period related to the life of the client request. When used for business analysis purposes personal information is not used, only the name of the company is relevant.

Personnel records of employees required for employment, training, competency and performance management purposes.

Naming persons with some personal identifiers of employees, contractors or the public that may be involved in incident reporting and investigations as required by law.

Names or photographs attached to minutes and electronic signatures [Inform Module] that are traceable to an individual person.

Source of and dealing with unsolicited personal information – Reference Aust APP #4 and NZ IPP #2

A cookie is a small file that resides on your computer and is recognised by our server when you visit our software platform. Lucidity cookies do not provide us with any personally identifiable information. They are used solely for the purpose of ensuring accurate, effective and timely operations associated with Lucidity module functionality.

### Manner of notification of the collection of personal information – Reference Aust APP #5 and NZ IPP #4

Should the need arise for personal information to be collected by Lucidity, it is either collected directly from the individual who is made aware of the purpose of the information or is provided by the Lucidity subscriber who confirms the information has met the requirement of APP #5 or IPP #4.

Personal information may be directly collected by Lucidity subscribers and transferred to their Lucidity platform in a secure format for building their initial Lucidity site set up. This information is held secure, added to the client site and destroyed once confirmation from the client is received that the data is accurate.

### Limits of use or disclosure of information – Reference Aust APP #6 and NZ IPP #10

Lucidity does not disclose personal information collected for general business practices nor that collected for employment purposes.

Lucidity does not disclose personal information collected by our clients for site set up. It is used only for the purposes of enabling the software platform for client use. Clients inform their staff that this information is required to be installed into Lucidity and staff are provided with secure password access to check the content and validity of their information.

### Direct marketing – Reference Aust APP #7

Personal identifiable information is neither provided nor collected through direct marketing.

### Cross-border disclosure PI to an overseas person – Reference Aust APP #8 and NZ IPP #12

Cross-border disclosure of personal information is practiced between Australia and New Zealand only. This only applies to Lucidity employee information when addressing company wide data analysis.

No other overseas person or organisation is involved in this process other than regulators according to law.

### Limits on adoption use or disclosure of Govt related identifiers – Reference Aust APP #9 and NZ IPP #11

Lucidity does not use, disclose government supplied data for any purpose whatsoever.

### Quality and accuracy checking of personal information – Reference Aust APP #10 and NZ IPP #8

Lucidity uses only personal information supplied by the clients for client purposes at the time it is provided and then securely destroyed. The quality of data provided is reliant on the client as the source of data.

Lucidity shall provide access to an individual person's information on request after the ID of the individual has been confirmed.

### Storage and security of personal information – Reference Aust APP #11 and NZ IPP #5 and 9#

Data is stored in a firewalled server/s through cloud providers and accessible upon request by the individual after ID checks.

Personally identifiable data collected from staff is stored in our own Lucidity portal under 2F authentication processes and subject to annual update checks or when revised data is provided. Storage is limited to a need to hold basis with timely secure destruction.

### Access to personal information – Reference Aust APP #12 and NZ IPP #6

The Privacy Act [Australia and New Zealand] gives you the right to access and correct your personal information.

On request from a staff member and ID confirmation, personal information is made available through temporary access provisions.

Clients holding personally identifiable data on Lucidity platform are responsible of provision of access – this is not in the control of Lucidity and any requests we received are referred back to the owner organisation.

### Correction of personal information – Reference Aust APP #13 and NZ IPP #7

A process to respond to access and correction of personalised data collected by Lucidity is addressed on request with the provision of access to update. Client data does not fit into the Lucidity domain.

If you are not satisfied with our response please contact us directly or you may take your complaint to the Office of the Australian Information Commissioner (<http://www.oaic.gov.au>) or the Office of the New Zealand Privacy Commissioner <https://www.privacy.org.nz>.

### Updating the Lucidity Privacy Statement

In order to reflect the fact that privacy legislation is constantly changing, we reserve the right to change this policy at any time. Updates will be communicated via [Luciditysoftware.com.au](http://Luciditysoftware.com.au) website.

| Rev No                | Changes made                                             | Who Reviewed & Approved    | Training required? (Y/N) |
|-----------------------|----------------------------------------------------------|----------------------------|--------------------------|
| A - 5.1.1             | Updated from original doc 'what is personal information' | Executive Team [ISO 27001] | Yes                      |
| A - 5.1.2<br>Jan 2020 | Minor updates                                            | Wayn Wong                  | No                       |

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Revision: A 5.1.4  
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Approved: Executive Team  
Owner/Author: CEO

## Privacy Policy Statement



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|---------------------|----------------------------------------|------------------|-----------------------|
| 5.1.3<br>July 2021  | Confirmed legislation currency         | N.Cruise for ELT | No                    |
| 5.1.4<br>April 2022 | Integration of NZ legislation and IPPS | N.Cruise for ELT | Yes updated awareness |

Digital Signature Approval:

A handwritten signature in black ink, appearing to be "N. Cruise", written over a light grey grid background.