



Wolters Kluwer Commitment

Wolters Kluwer is committed to protecting the privacy of personal information that is collected in the course of conducting our business.

The Privacy Act 1988 regulates the way private sector organisations can collect, use, store and disclose personal and sensitive information.

The Privacy Act 1988 (Commonwealth) requires Wolters Kluwer and its employees to comply with the National Privacy Principles (NPPs). This policy sets out how WK employees, contractors and consultants are required to handle personal information which they collect and /or to which they have access during the course of their duties.

The NPPs aim to ensure that organisations like Wolters Kluwer, which hold large volumes of personal information, handle that information in a responsible way. The NPPs also give people some control over the way that information about them is handled. The NPPs are drafted in a technology neutral way so that they apply equally to paper-based information and to computerised information.

Personal Information

The Privacy Act protects "personal information" which is information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can be reasonably ascertained, from the information or opinion. It includes all personal information regardless of its source.

Personal information must relate to an individual person; so information about a company is not personal information. The NPPs apply to the collection of personal information by Wolters Kluwer for inclusion in a record or a generally available publication; and personal information which has been collected by Wolters Kluwer only where that information is held in a record.

A "record" includes a document, database or photograph, but excludes a generally available publication. A "generally available publication" is a publication, however published (eg on paper or on the web), that is generally available to the public.

Breaches of the Privacy Act 1988 will result in significant penalties - following this guideline will ensure that you meet your legal obligations.

Contravention of privacy policy, procedures, and rules constitutes a disciplinary offence, and serious or repeated breaches will lead to termination of employment.

Privacy Procedures

As an employee, you are required to comply with the procedures for handling personal information as outlined in the Privacy Policy. These procedures involve:

- ❖ Collection - personal information should only be collected when it is necessary to carry out a particular business function or administrative activity.
- ❖ Access and use - access to personal information should only be sought and granted where there is a demonstrated need for this due to an employee's duties or responsibilities.
- ❖ Security - personal information should be kept secure, whether it is a paper based or a computerised record.
- ❖ Disclosure - as a general rule, personal information should not be disclosed to third parties. Information not expected to be publicly known concerning employees and customers should be treated as confidential.

Privacy Complaint Procedures

If you receive or have a privacy related complaint, you should:

- ❖ discuss it with your manager/supervisor on a confidential basis;
- ❖ organise or advise for the complaint to be made in writing to the HR Manager; and,
- ❖ ensure that the identity of the person/ company whose privacy appears to have been breached is clearly stated.

Please note that anonymous complaints cannot be dealt with.

Document Archiving and Destruction

Personal information should not be archived unless another law (eg taxation laws) requires it or because the information is necessary for WK to conduct its business (eg company financial records). All personal information that is not eligible for archiving should be destroyed as soon as it is no longer required for the purpose it was originally collected for.

All documents/records lodged for archiving must specify a destruction date, and should be destroyed once the destruction review date is reached, unless there is a legitimate business reason for an extension. The manager of the department, which originally archived the documents, should authorise the destruction of the documents.

Right of Access

You have a right to access the personal information we store about you subject to some limited exceptions contained in the Privacy Act. If you find that the information which we store about you is inaccurate, incomplete or out-of-date, then we will correct it. If you wish to access your information, then please contact your HR Business Partner.

Date of last review:	August 2010
Applies to:	All WKAP staff