

TX Management Systems (SkillsTx) Privacy Policy

23 May 2018

1. About this policy

The Privacy Act 1988 requires entities bound by the Australian Privacy Principles to have a privacy policy. This privacy policy outlines the personal information handling practices of TX Management Systems Pty Ltd (ABN 55 608 536 456) ('we' or 'us').

This policy is written in simple language. The specific legal obligations of TX Management Systems Pty Ltd when collecting and handling your personal information are outlined in the *Privacy Act 1988* and in particular in the Australian Privacy Principles found in that Act. We will update this privacy policy when our information handling practices change.

General Data Protection Regulation (GDPR)

We are continuously reviewing our privacy policies and processes in line with GDPR requirements. We have already reviewed the data we hold (as referred to later in this policy, section 2.2) and the security relating to personal data. Where your data is not considered part of your employment obligations our system provides **Forget Me** capability. This will erase all your identifying data, is irreversible and entirely under your control.

2. Collection and storage of your personal information

2.1. Why do we collect your personal information?

If you are a customer of either TX Management Systems or one of our Reseller Partners, in order to provide you with the ability to document the skills that are held by each individual within the workforce and to compare these skills with the skills, as documented within Job/Role descriptions, required by your organisation. We always try to collect only the information we need for the particular products and/or services that you have asked us to provide to you!

If you are an employee or contractor, we provide the ability to view your skills via a secure system and update them if you acquire additional skills.

2.2. What personal information do we collect and store?

The personal information we collect and store will depend on which TX Management Systems Pty Ltd services and products you order and/or subscribe to. The information may include:

- Names and basic contact details, including location, email address and job title.
- basic employment information, job title within the organisation, length of service and employment status (full time, part time etc).
- skills as they relate to Skills Framework for the Information Age (SFIA).
- other information an individual may optionally provide to us, e.g. through comments that are entered when completing self-assessment surveys.
- Optionally (and under the control of the individual) the contents of your Curriculum Vitae or Resume to improve our machine learning algorithms.

2.3. Request for information we hold

Each individual can, via our Planner console, use the Settings menu and request a list of all data held. This will produce an Excel export of all data we hold.

2.4. How do we collect personal information?

Direct collection

Contact details will be collected directly from the organisation or from individuals via Excel templates and loaded into our platform or entered directly via a secure password accessible administration console.

Other personal information is provided directly by individuals via a secure encrypted online survey which is accessed via an encrypted token hyperlink sent to a registered email addresses.

Social media

We do NOT collect information via any social media platforms except publicly available LinkedIn profile data if a LinkedIn URL is optionally provided by an individual.

Email lists

If you choose to subscribe to one or more of newsletter or information services we collect your email address and, if you provide it, other contact details when you subscribe to our email lists. We only use this information to send you our newsletter, regular updates on TX Management Systems Pty Ltd and our services, and to administer the lists.

Collecting through our website and our use of cookies

For the purposes of providing our services we do NOT capture personal information via our website or cookies unless an individual subscribes to a newsletter or self-assessment. The information collected is clearly visible on the submission form. Our website privacy statement is available here: <https://skillstx.com/privacy/>

Indirect collection

We do NOT collect information indirectly.

2.5. How do we store/hold your personal information?

All your information is stored electronically and securely in our database.

2.6. Anonymity

For most of our services we usually need a name and contact information and enough information about the particular matter to enable us to fairly and efficiently handle the inquiry, request, complaint or application, or to act on communication with us.

3. What if you don't provide us with your personal information?

If you don't provide your personal information to us, we may not be able to properly provide our service to you, administer your account, verify your identity and/or let you know about other products and services that might be useful to you.

4. When will we notify you that we have received your information?

Individuals will automatically receive a report containing the personal information they have provided. This report will confirm that we have captured personal information and stored it securely.

5. Data/Security breach notification

Any individual affected by a data breach will be notified using the email address we hold within 48 hours of the breach being detected.

6. Disclosure

Your privacy and the protection of your personal information is very important to us. We do not disclose your personal information to any other person, organisation or entity except our contracted resellers and/or your employer.

6.1. Resellers

TX Management Systems Pty Ltd uses a number of resellers who provide value added services. These resellers may have access to personal information at the discretion of the customer. However, our resellers will also have a comprehensive Privacy Policy to explain how and why they access personal information.

7. Quality of your personal information

To ensure that the personal information we collect is accurate, up-to-date and complete we do one or more of the following (where practicable and relevant):

- record information in a consistent format;
- promptly add updated or new personal information to existing records; and/or
- verify our contact lists to check their accuracy.

The accuracy of your information is of course largely dependent on what is provided to us. To make sure we've got the most current and accurate details we provide an optional secure online service for individuals to maintain most of their personal information.

8. Security of your personal information

The security of your personal information is a high priority for us. We take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements of our employees;
- security measures for access to our system;
- electronic security measures in our system like firewalls and data encryption; and
- operating within one of the most secure environments available. See here for details: <https://azure.microsoft.com/en-us/support/trust-center/>

9. Direct Marketing

The personal information we capture and store for the purposes of providing our services will NOT be used for direct marketing. However, if you did accept our free self-assessment offer we may contact you via email or other electronic means from time to time with information relating to software updates, new features and offers. You can unsubscribe to this communication at any time using the unsubscribe option in the email.

10. Accessing and correcting your personal information

Optionally, personal information can be viewed and updated by individuals using a secure encrypted online system. They have control over their own password. This service will be available at the discretion of the organisation who have subscribed to our services.

11. How to make an inquiry or a complaint

If you have an inquiry or a complaint about how we handle your personal information, we want to hear from you. Please let us know about your concerns in one of the following ways:

- submitting an electronic contact form via skillstx.com
- emailing us at: info@skillstx.com

We are committed to resolving your complaint and doing the right thing by our customers. Most complaints are resolved quickly, and you should hear from us within five business days.

If you are not satisfied with our response you may ask for a review by a more senior officer within TX Management System Pty Ltd, whose contact details are available here: <https://skillstx.com/the-team/>

If you still feel your issue hasn't been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner:

- online at: www.oaic.gov.au/privacy
- by phone on: 1300 363 992
- via email to: enquiries@oaic.gov.au
- in writing to: GPO Box 2999, Canberra, ACT 2601
- by fax on: +61 2 9284 9666.

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