1. **Personal Information and Data Collection.** On-Country Pathways will seek your permission to collect, hold, use and disclose personal information (including sensitive information) for the purposes of, assessing your eligibility and suitability to engage in a program, to safely and effectively conduct its programs and to use this information to report to our funding bodies on the progress and outcomes of our programs.

   The personal information that you or your authorised representative (i.e. a third party such as a parent or carer, referral agency or school) provide to On-Country Pathways is confidential within certain legislative limitations. For example, your personal information may be disclosed to any person with a lawful entitlement to obtain the information, such as Police. Relevant contact information will also be shared with program partners (other third parties such as program mentors and businesses providing placement opportunities) to enable programs to be conducted safely and effectively.

   We apply security and privacy controls to the way we collect, hold, use and disclose your personal information and data. At all times your personal information is handled in accordance with the Privacy Act 1988, the Australian Privacy Principles and On-Country Pathways' Privacy and Copyright Policy.

2. **Type of Personal Information and Data.** The following information will be collected by On-Country Pathways from potential program candidates, parents or carer's, referral agencies, mentors, participating businesses and participating schools through the completion of program referral forms, other program induction forms, mentoring agreements and work placement agreements:

   - **Program Candidates:**
     i. Full name
     ii. Date of birth
     iii. Address
     iv. Phone/Mobile number
     v. Email address
     vi. Aboriginal and/or Torres Strait Islander heritage
     vii. Driver Licence details
     viii. Student status
     ix. Employment status
     x. Criminal history
     xi. Medical Condition Status
     xii. Disability status
     xiii. Vaccination status (if and when required)
     xiv. White Card Holder status
     xv. Next of Kin or Emergency Contact details
     xvi. Concession card status
     xvii. Out of home care status or history

  xviii. Photos and images

- **Referral Agency:**
   i. Agency name
   ii. Contact person's full name
   iii. Position
   iv. Phone/Mobile number
   v. Email address
   vi. Referral date

- **Mentors:**
   i. Full name
   ii. Address
   iii. Phone/Mobile number
   iv. Email address
   v. Police Check
   vi. Working with Children Check status
   vii. Vaccination status (if and when required)
   viii. Photos and images
   ix. Drivers Licence
   x. Emergency Contact/Next of Kin

- **Business:**
   i. Business Name
   ii. Address
   iii. Contact person's full name
   iv. Position
   v. Phone/Mobile number
   vi. Email address
   vii. Worksite Location (if different from business address)
   viii. Worksite Supervisor details (if different from contact person)
   ix. Photos and images

- **School:**
   i. School name
   ii. Contact person's full name
   iii. Position
   iv. Phone/Mobile number
   v. Email address

3. **Using Personal Information and Data.** Without the personal information and data outlined above, On-Country Pathways would not be able to plan, conduct and evaluate its employment and career pathway programs safely and effectively – this is our primary purpose of using your personal information and data. We also use this data to report to our funding bodies on the progress and outcomes of programs. On-Country Pathways will not misuse this information or

intentionally disclose it to a third party that is not identified in this policy or use it for any secondary purposes.

4. On-Country Pathways Programs may be funded (in part or in whole) by local, state and/or federal government agencies. When programs are funded by government, there is a requirement to report on program outcomes and some agencies and departments use data information systems to enable this process. Your personal information may be shared with these agencies or departments as a requirement of our funding agreements; however, you can elect not to be identified by name or address, but other demographic data we collect from you will be shared.

5. **Security and Privacy of Personal Information and Data.**

On-Country Pathways uses monday.com, an all-in-one work operating system that has been customised to manage the implementation, coordination, delivery and evaluation of our programs. Monday.com is a fully cloud-based service which is hosted on Amazon Web Services infrastructure in Northern Virginia, USA. The Monday.com program is based on ISO 27001 and includes in its scope the entire monday.com organization, including its subsidiaries, employees, contractors, subcontractors, partners and anyone who creates, maintains, stores, accesses, processes or transmits monday.com's or its users' information in connection with performance of the service provided by monday.com. More detailed information about security and privacy at Monday.com can be found here: FAQ_Security_and_Privacy_Aug_2020.pdf (cloudinary.com)

OCP use Microsoft Defender as part of Our Microsoft 365 environment. Our devices are MS 365 enrolled and managed and admin level access both within Microsoft 365 and devices is restricted to delegated administrators. End users are not able to make changes to their systems such as adding additional software without administrator intervention.

Microsoft Defender 365 provides firewall protection through a combination of network monitoring, cloud-based security, and advanced threat detection. Its features include:

- **Network Firewall**: Controls incoming and outgoing traffic to block unauthorized access.
- **Cloud-native Protection**: Utilizes real-time threat intelligence from the cloud.
- **Intrusion Detection and Prevention**: Monitors for suspicious activity and blocks potential threats.
- **Application Control**: Allows or restricts specific applications from accessing the network.
- **Integration with Other Security Tools**: Works with Endpoint Detection and Response (EDR) and Security Information and Event Management (SIEM) for enhanced threat detection and response.

This multi-layered approach ensures robust protection against network threats.

Microsoft Defender 365 functions as a comprehensive antivirus solution with several key features:

- **Real-time Protection**: Continuously scans files and processes, using heuristic analysis to detect potentially harmful applications.
- **Advanced Detection**: Employs anomaly detection, machine learning, and behavioral blocking to identify and stop threats, even new variants.
- **Cloud Intelligence**: Utilizes the Microsoft Intelligent Security Graph for up-to-date threat information and provides regular updates for ongoing protection.
- **Multi-platform Support**: Protects devices across Windows, macOS, Linux, Android, and iOS.
- **Performance Optimization**: Includes tools to minimize scan impact on system performance and ensures compatibility with other antivirus solutions.

Overall, Microsoft Defender 365 delivers robust, AI-driven antivirus protection against a wide range of threats.

6. **Photos and Images.** On-Country Pathways will seek your written permission to take photos and images (including video and audio) and to use these to promote future programs and/or report progress or news about current or previous programs to partners and stakeholders. A- *Talent Consent and Release Form* is attached as **APPENDIX 1**.

7. **Cookie Consent.** The website for On-Country Pathways (https://on-countrypathways.com.au/) does not store data that could be used or be recognised as personally identifiable information. We may use cookies to view how you interact with our site for analytics/SEO purposes which are subject to the policies and terms listed through Google Analytics:

8. https://policies.google.com/technologies/partner-sites**Embedded Content.** Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website. By accepting our settings prompt for cookie preferences you are agreeing to the above terms.

9. **Third-Party Disclosure.** Some personal information will be shared with mentors and mentees that are matched together as part of a program, but this will be limited to names and contact details, vaccination status (where applicable) and Working with Children Check status (where applicable) to enable effective communication between mentor and mentee. Some personal information will also be shared with the business owner/supervisor(s) that it is providing a work placement during a program, and this will be limited to name, contact details, white card status, driver licence status, vaccination status (where applicable), disability status and next of kin / Emergency Contact details. This information will be shared at the commencement of a program.

10. **Personal Data Protection.** The security of your personal information and data is very important to us, but despite our security and privacy controls, no method of transmission over the internet, or electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information and data, we cannot guarantee its absolute

security.

11. **Rights to Change or Delete Information.** Your personal information or data can be changed, updated or deleted while a program is being conducted by providing notification in writing to the Program Manager. To effect a change, update or deletion please make direct contact with the On-Country Pathways Program Manager using contact details provided below.

12. **Notifications of Changes.** This is the first version of On-Country Pathways' Privacy Policy. Any future changes or amendments to this Policy will be outlined in this paragraph.

13. **Contact Information.** If you have any concerns about how we collect, hold, use and disclose your personal information and data, you can discuss your concerns with us:

> On-Country Pathways:
> C/- 52-54 Hovell Street Wodonga VIC 3690
> admin@on-countrypathways.com.au

14. Copyright Notice: Copyright © 2021 On-Country Pathways Ltd All Rights Reserved

On-Country Pathways Ltd owns all the right of the work published.

APPENDICES:

Talent Consent and Release Form

Employee Name:	Sign:	Date:
Inductees Name:	**Sign:**	**Date:**