



AeroPM Data Privacy Policy

Version: 2.2

Signed By:

Adam Frizell

AeroPM General Manager

A handwritten signature in black ink, appearing to read 'Adam Frizell', is written over a horizontal line.

Signature

29 Apr 26

Date



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AMENDMENT LOG

Version	Date	Change
1.0		Initial Version
1.1	November 2022	Formatting update
2.0	October 2023	Inclusion of two factor authentication Inclusion of minimum annual review Reference to Employment Screening Australian Standard Update of process number for Issue Management Process Formatting throughout
2.1	March 2025	Annual review Policy template update Office of the Australian Information Commissioner (OAIG) Review 7.3 Contract Information
2.2		Annual Review



1. INTRODUCTION

1.1. Purpose

1.1.1. At AeroPM we are committed to responsibly handling person data in accordance with the Privacy Act 1988. AeroPM collects, uses and retains only the necessary information to fulfill our obligations including verifying and identified employment screening, onboarding of employees, securing roles and ongoing employment.

1.1.2. We protect this information by conducting frequent backups of data and technology drives, frequent AeroPM cyber audits, using two factor authentication where possible and updating passwords every 45 days, in accordance with AeroPM's Cyber Security Policy that underpins our Defence Industry Security Program (DISP). We value the security and privacy of every piece of employee data we obtain and treat it with upmost protection.

1.2. Applicability

1.2.1. This policy is applicable to all AeroPM Employees.

1.2.2. This Data Privacy Policy is applicable to all data provided to and held by AeroPM.

1.3. References

1.3.1. Privacy Act 1988

1.3.2. Defence Security Principles Framework (DSPF)

1.3.3. Australian Standard Employment Screening – AS 8411-2022.

2. OVERVIEW

2.1. General

2.1.1. AeroPM is a specialist services company that supports Defence with the procurement and sustainment of complex assets. AeroPM consists of both on-the-business (OTB) employees, who ensure the effective operation of AeroPM as a business entity, and client-facing employees, who deliver procurement and sustainment activities on behalf of the client. Importantly, all procurement and sustainment activities adhere to the client's quality management standards.

2.1.2. This manual outlines AeroPM's privacy policy and document control functions, ensuring that the collection, storage, and management of personal and business information comply with national privacy and data protection standards. It governs the handling of data related to Expression of Interest candidates, job application candidates, recruitment screening activities, securing roles, ongoing employment, client information, AeroPM

Intellectual Property (IP), internally generated AeroPM documentations, and the offboarding of employees. These processes are designed to protect the privacy of individuals, maintain the confidentiality of sensitive information, and ensure compliance with legal and regulatory requirements.

2.2. Responsibilities (where applicable)

2.2.1. General Manager

- a. The General Manager is responsible for:
 - i. The oversight and overall management of the Data Privacy Policy.

2.2.2. AeroPM Employees

- a. AeroPM employees are responsible for:
 - i. Acting in accordance with this policy.

3. LEGISLATED PRIVACY POLICY REQUIREMENTS

3.1. Privacy Act 1988

3.1.1. AeroPM is serious about the correct handling of information and meets the requirements outlined in the Privacy Act 1988.

3.1.2. The Privacy Act of 1988 outlines that an organisations privacy policy must tell you:

- a. The name and contact details of the organisation;
- b. What kinds of personal information the organisation collects and stores;
- c. How the organisation collects personal information and where it is stored;
- d. The reasons why the organisation collects personal information;
- e. How the organisation will use and disclose information;
- f. How information can be accessed or ask for a correction;
- g. How to lodge a complaint if information has been mishandled, and how the organisation will handle the complaint; and,
- h. The likelihood of information being disclosed outside of Australia.

4. NAME AND CONTACT DETAILS

4.1. AeroPM's Privacy Policy

4.1.1. This privacy policy is applicable to all AeroPM employees.

4.1.2. AeroPM can be contacted via:

- a. Telephone: 02 5100 7594
- b. Email: contact@aeropm.net

5. AEROPM'S PRIVACY STATEMENT

5.1. AeroPM's Privacy Statement

5.1.1. AeroPM is committed to protecting the privacy and security of personal information. This Privacy Policy outlines how we collect, use, disclose, and safeguard personal information in accordance with the Australian Privacy Act 1988.

5.1.2. This Privacy Policy applies to personal information collected from individuals who interact with AeroPM, including but not limited to:

- a. Expression of Interest Candidates – individuals expressing interest in potential opportunities at AeroPM.
- b. Job Application Candidates – individuals applying for employment opportunities with AeroPM.
- c. Recruitment Screening Activities – individuals undergoing assessments and evaluations as part of AeroPM's recruitment process.
- d. Securing roles – preparing and disseminating employee and business information to potential clients.
- e. Ongoing Employment – individuals employed by AeroPM, covering their tenure with the company.
- f. Client Information – individuals and organisations engaging AeroPM's services.
- g. Offboarding of Employees – individuals who have exited employment with AeroPM and require ongoing administrative or compliance-related processing.

5.1.3. AeroPM implements appropriate security measures to protect personal information from unauthorised access, use, disclosure, or loss. Personal information is retained to fulfil

the purposes outlined in this Privacy Policy and in compliance with the Australian Privacy Act 1988.

5.1.4. AeroPM obtains permission to collect and disclose personal information through AeroPM's Privacy Consent Form (Enclosure 1).

6. WHAT KINDS OF PERSONAL INFORMATION AEROPM COLLECTS AND STORES

6.1. Personal Data

6.1.1. AeroPM collects and obtains personal information from candidates and employees. In doing so, AeroPM may access information from external entities, third-parties, previous employers, educational institutions, or private organisations.

6.1.2. AeroPM collects personal information from:

- a. Expression of Interest Candidates
- b. Job Application Candidates
- c. Recruitment Screening Activities
- d. Employees
- e. Clients
- f. Offboarding of Employees

6.2. Information AeroPM Collects and Stores from Candidates

6.2.1. The information collected and stored from Job Application Candidates is at Annex A.

6.2.2. Candidates undertaking AeroPM's screening process can update this information at any time.

6.3. Information AeroPM Collects and Stores from Employees

6.3.1. The information collected and stored from Employees is at Annex A and Annex B.

6.3.2. Employees can update this information at any time.

6.4. Information AeroPM Collects and Stores from Clients

6.4.1. The following information is collected and stored from Clients:



- a. Contact Name
 - b. Company
 - c. Phone Number
 - d. Email Address
- 6.4.2. Clients can update this information at any time.

7. HOW AEROPM COLLECTS PERSONAL INFORMATION AND WHERE IT IS STORED

7.1. How AeroPM collects information

7.1.1. AeroPM collects information through a variety of sources such as:

- a. BambooHR (AeroPM's HR Management system)
- b. Email correspondence
- c. Digital forms
- d. Referee and independent candidate screening checks
- e. AeroPM does not request or store hardcopies of any personal data or information.

7.2. Access to information

7.2.1. Access to information for the on-the-business team is granted on a "need to know" basis.

7.2.2. The AeroPM Executive Team has access to all data collected.

7.2.3. The AeroPM Recruiting Team has access to the BambooHR Hiring tab, which is the mechanism that AeroPM obtains and stores personal information.

7.2.4. The AeroPM Onboarding Team has access to BambooHR, Xero and NAB which is the mechanism that AeroPM processes onboarding.

7.2.5. The AeroPM Finance Team has access to personal information within BambooHR, Xero and NAB which is the mechanism that AeroPM processes payroll.



7.2.6. The AeroPM Contracting Team has access to OneDrive file “Management” which contains employee personal information and client information that allows AeroPM to bid for work and execute contracts.

7.2.7. The AeroPM OTBT has access to a variety of Slack channels that contain personal information, these are assigned on a need-to-know basis.

7.3. Storage locations

7.3.1. There are seven locations where personal information is stored:

- a. **BambooHR** – Within each employee’s personal file. Only the employee, the Executive, and key members of the on-the-business team can access this information.
- b. **OneDrive** – Within each employee’s personal file. Only the employee, the Executive, and key members of the on-the-business team can access this information.
- c. **Xero** (cloud-based accounting software) – Within each employee’s personal file. Only the Executive and Finance Lead can access this information.
- d. **National Australia Bank** (AeroPM banking institution) – Within each employee’s personal file. Only the Executive and Finance Lead can access this information.
- e. **Company email repositories** – Within the Executive and key members of the on-the-business team email repositories. Only accessible by email inbox owner.
- f. **Back-up files and Back-up Hard Drives** – Each of the above storage locations is backed-up in accordance with AeroPM IT policies.
- g. **Slack** (cloud-based communication platform) – Some personal information is discussed within the #capturemanagement, #management, #opsmanagement, #recruitment and #securityclearancemanagement. Only the employee, the Executive, and key members of the on-the-business team can access this information.

7.4. Disposing of personal information

7.4.1. AeroPM policy dictates that printed copies of personal information are shredded upon completion of use.

7.4.2. AeroPM review the necessity to retain personal information for no more than five years after an employee offboards from the company, or five years after a candidate has applied to AeroPM. Due to the nature of consulting services, AeroPM maintains this



information because of the high probability of re-employment. After five years, all personal information is securely discarded from AeroPM's systems.

8. THE REASONS WHY AEROPM NEEDS TO COLLECT PERSONAL INFORMATION

8.1. Recruitment Information

8.1.1. AeroPM has developed a recruitment process (G.2.2_AeroPM Recruitment Process) to screen potential candidates against selection criteria. In conducting these screening activities, potential candidates must prove their identity, provide evidence against their achievements, and disclose any criminal findings. Further, the recruitment team obtains information from supervisors and third parties to verify performance, qualifications, skills and experiences.

8.2. Employment Information

8.2.1. As a responsible employer, AeroPM is required to obtain and store personal data to aid in the management and development of each employee. AeroPM only obtains information necessary to carry out our duties in relation to disclosing identity and contact information, coordinating our duties in relation to disclosing identity and contact information, coordinating payroll and super payments, and to obtain roles through our clients for our employees where a subset of personal information is provided in the form of a CV to the client to demonstrate that the employee is fit-for-purpose for that specific role. These AeroPM CVs are approved by each employee prior to the CV being provided to the client.

8.3. Contract Information

8.3.1. Personal details of AeroPM employees and subcontractors is required by their client. This includes full name, security clearance, date of birth, telephone number, and, in some instances can include next of kin contact details, residential address and ID details (such as license/passport number and photo of ID).

9. HOW AEROPM USES AND DISCLOSES INFORMATION

9.1. Information disclosure

9.1.1. AeroPM uses a candidate's personal information during the recruitment process (G.2.2_AeroPM Recruitment Process) to screen potential candidates against selection criteria. Throughout this process AeroPM will not disclose information without the candidate's permission.

9.1.2. AeroPM is committed to transparency when disclosing personal information during independent assessments. Such disclosures are strictly limited to what is necessary to fulfill the purpose of the assessment and are handled in accordance with the Privacy Act of 1988 and AeroPM’s internal policies. Personal information may be shared with independent assessors to evaluate compliance, performance, or other relevant criteria, ensuring the information is used solely for the intended purpose.

9.1.3. AeroPM discloses personal information in a supervisor assessment only to the extent necessary to support performance evaluation, feedback, and professional development. This information is shared in a controlled and confidential manner, ensuring it aligns Privacy Act of 1988 and AeroPM’s internal policies. Supervisors are provided access to personal information strictly for the purpose of conducting fair and accurate assessments, such as reviewing work performance, identifying strengths, and highlighting areas for improvement. AeroPM maintains robust safeguards, to protect the privacy of individuals and ensure personal information is handled responsibly and appropriately.

9.1.4. AeroPM will not disclose any information from Expression of Interest Candidates, Job Application Candidates, Recruitment Screening Standards, Ongoing Employees, Clients or Offboarding Employees to anyone outside the organisation or without a “need to know” without permission from the owner and provider of that data.

9.1.5. At times AeroPM may share a candidates or employees CV with an AeroPM employee or AeroPM client to confirm their suitability for a specific vacant position. The process is conducted with strict adherence to confidentiality and privacy principles and only the information necessary for assessing the candidate’s fit for the role is disclosed.

10. HOW EMPLOYEES CAN ACCESS OR COLLECT THEIR PERSONAL INFORMATION

10.1. Accessing and updating personal information

10.1.1. Employees can access and update any of their personal information stored in BambooHR (points 1-6 within Annex A) at any time through their personal login. Should employees need access to any documentation mentioned in point 7 or 8, they can contact one of the AeroPM admin team to update or correct their details.

11. HOW TO LODGE A COMPLAINT REGARDING THE HANDLING OF PERSONAL INFORMATION

11.1. Lodging a complaint

11.1.1. A formal complaint regarding the handling of personal information by AeroPM is to be provided via email to the General Manager.

12. HOW COMPLAINTS ARE HANDLED

12.1. Handling Complaints

12.1.1. Once a complaint is received by the General Manager, a complaint will be handled in accordance with the AeroPM issue management framework (G.3.4.2_AeroPM Employee Issue Management Process).

13. LIKELIHOOD OF DISCLOSING PERSONAL INFORMATION OUTSIDE OF AUSTRALIA

13.1. Lodging a complaint

13.1.1. The likelihood of AeroPM disclosing personal information outside of Australia is assessed to be VERY LOW.

14. ADMINISTRATION

14.1. Document owner and approval

14.1.1. This policy is formally authorised and approved by General Manager on 28 Apr 26

14.2. Review

14.2.1. This policy will be reviewed annually at a minimum. The next scheduled review is to occur on or before 28 Apr 27.

14.3. Related documentation

14.3.1. Related processes, templates or forms are identified within the table below.

Related processes	G.2.2 AeroPM Recruitment Process
Related templates or forms	Annex A – Personal Information Enclosure A – Privacy Consent Form Attachment A – 100 Point Identification Check

Table 1: Related processes, templates or forms

ANNEXES

A. Personal Information



ENCLOSURES

1. Privacy Consent Form

ATTACHMENTS

1. 100-Point Identification Check
 - a. Check: located in AeroPM Vault > G. People & Professionalisation > 2. Recruitment > 2. Recruitment Process > 3. ID Check



ANNEX A – Personal Information AeroPM Collects and Stores from Candidates

1. Personal particulars:
 - a. Name
 - b. Address
 - c. Birth date
 - d. Age
 - e. Gender
2. Contact details:
 - a. Phone number
 - b. Personal email address
 - c. Address
3. Job particulars:
 - a. Candidates CV
 - b. Preferred employment method
 - c. Salary expectations
 - d. Security clearance
 - e. Additional employment status
 - f. Qualifications/Certifications/Qualifications
4. Citizenship details
5. Veteran status
6. Does the applicant identify as Aboriginal or Torres Strait Islander
7. Documentation
 - a. 100 points identity check



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8. Police Check
9. AF220 – Defence Conflict of Interest Declaration

ANNEX B – Personal Information AeroPM Collects and Stores from Employees

1. Personal particulars:
 - a. Marital status
 - b. Allergies
 - c. Bank account details
 - d. Tax file number (TFN)
 - e. Superannuation details
2. Job particulars:
 - a. Reserve service status
3. Emergency contact details:
 - a. Name of contact
 - b. Relationship to contact
 - c. Phone number
 - d. Email address
 - e. Address
4. Dependents' names
5. Details of personal international travel
6. Details of Services Australia mandated withholding payments
7. Medical data - details of medical conditions, disabilities, illness or injuries

ATTACHMENT A – 100-Point Identification Check

PROOF OF IDENTITY and RIGHT TO WORK IN AUSTRALIA

100 POINT IDENTIFICATION CHECK

The following Documents are acceptable as the **Proof of Identity** and you must provide enough identification to reach 100 points.

The documentation must also prove the **Right to Work in Australia** as well so you must provide one of the 70 point items and one document with a photograph.

- Original documents only permitted.
- Only one document in each category counts towards the 100 points target.

Points	Item
70	Birth certificate or original extract
70	Citizenship certificate
70	Passport with photograph (current or expired within the preceding 2 years but not cancelled)
25	Bills (e.g. electricity, gas, telephone, etc) one per institution issue only
25	Credit/Debit/ATM cards – count 25 points for each
25	Electoral roll
40	ID card (with photograph or signature)
25	- Public Service employee
40	- Employment (not Public Service)
40	- Tertiary education
40	- Other – sealed in plastic – Government issue
40	Licence (with photograph)
25	- Sealed in plastic – Government issue (e.g. Drivers, Shooters)
25	- Paper – government issue (e.g. Interim Drivers)
25	- Other (e.g. International/Foreign Drivers)
25	Marriage certificate
25	Medicare card
25	Membership card
25	- Club
25	- Union/Professional/Trade association
25	- Library/Video library
25	Rates notices – water, sewerage, council, etc
25	Registration certificate (e.g. car, boat, etc)
35	Securities
35	- Mortgage document (letter of lien)
40	- Certificate of title, etc
40	Social Security/Pension card
25	Telephone directory – must telephone to confirm and speak with signatory
40	Written reference from:
35	- Referee identification
25	- Previous or current employer within last 2 years
25	- Other referee (e.g. landlord, rental agent, etc)
25	Other acceptable document that verifies name and address or signature

At least one document must contain a photograph.