

Privacy Policy and Full Statement

The Lucidity Privacy Policy informs you what information we collect, what we do with it and your rights to view, correct or change it.

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

Responsibilities and authorities

Lucidity's Data Privacy Officer is the CTO which support from the Managing Director.

Lucidity staff are trained in Privacy and Australian Privacy Principles awareness on employment and every year thereafter.

Forms, templates and records

- Training module - awareness training
- Client received data sets
- Subcontractor Module

What is personally identifiable information?

'Personal information' is defined in 6(1) of the Privacy Act to include information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

Personal identifiers	Yes/No	Rationale
Username (<i>eg billsmith</i>)	No	Names and Usernames alone are not personal information that could be considered an 'eligible data breach'. A name or username has to be linked to another identifier that in turn could lead to accessing other information about the person that then has the capacity to 'cause serious harm'.
Name (<i>eg Bill Smith</i>)	No	Names and Usernames alone are not personal information that could be considered an 'eligible data breach'. A name or username has to be linked to another identifier that in turn could lead to accessing other information about the person that then has the capacity to 'cause serious harm'.
Name or Username and Date of Birth	Yes	Name or username attached to DOB is a clear identifier of a person and as such could lead to personal identification and subsequent capacity to 'cause serious harm'.

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Name or Username and email	Yes	A name or username and email address could lead to employer identification which in turn could lead to personal identification and subsequent capacity to 'cause serious harm'.
Name or Username and phone number	Yes	A name or username and phone number [whether personal number or business number] could lead to employer identification which in turn could lead to personal identification and subsequent capacity to 'cause serious harm'.
Name or username and employer identification	Yes	A name or username and association with an employer could lead to personal identification and subsequent capacity to 'cause serious harm'.

Lucidity will not share the information that we collect with any third parties apart from those where regulatory requirements must be met. This includes any encrypted data according to Australian law.

What personally identifiable information Lucidity collect and retain?

- 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.
- Contractors naming employees within the Contractor Module.

What personally identifiable information Lucidity do not collect?

Lucidity neither collect nor retain information held by clients on Lucidity software platforms. The collection and retention of any information held on Lucidity Software subscription services platforms is the domain and in control of the client who pays the subscription.

Lucidity provides data security measures to support the security of Lucidity platforms.

How Lucidity complies with the Australian Privacy Principle [APP]

APP	Principle	How Lucidity complies
1.	Open and transparent management of personal information.	Lucidity provide contact details in this policy for contact with the Data Privacy Officer for complaint handling or any other query - email info@luciditysoftware.com.au
2.	Anonymity and pseudonymity	Lucidity does not deal with the collection of any personal information that requires or could be of any use if anonymity or pseudonymity is practiced
3.	Collection of solicited personal information.	Lucidity request 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.
4.	Dealing with unsolicited personal information.	Lucidity does not receive unsolicited personal information. There is no cookie or other mechanism where we could collect or store such information.
5.	Notification of the collection of personal information.	Personal information if collected by Lucidity, is only collected directly from the individual and are aware of the purpose of the information. Personal information is collected by our clients and transferred to Lucidity 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 conformation form the client is received that the data is accurate.
6.	Use or disclosure of personal information.	We do 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 .
7.	Direct marketing	Personal identifiable information is neither provided nor collected through direct marketing.

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| 8. | Cross-border disclosure of personal information | Cross-border disclosure of personal information is not practiced by Lucidity. This does not apply to our business model. |
| 9. | Adoption use or disclosure of Govt related identifiers | Lucidity does not use, disclose government supplied data for any purpose whatsoever. |
| 10. | Quality of personal information | <p>Lucidity uses only personal information supplied by the clients for client purposes at the time it is provided and then securely destroyed. Therefore the quality of data provided is reliant on the client as the source of data.</p> <p>Data is stored in a firewalled server/s through cloud providers and accessible upon request by the individual.</p> |
| 11. | Security of personal information | Personally identifiable data collected from staff and subcontractors is stored in our own Lucidity portal under 2F authentication processes and subject to annual update checks or when revised data is provided. |
| 12. | Access to personal information | <p>On request from a staff member or subcontractor their data is made available through temporary access provisions.</p> <p>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.</p> |
| 13. | Correction of personal information | 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. |

Lucidity uses Cookies without collecting personally identifiable information

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.

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Changing the Lucidity Privacy Policy 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 website.

Your Right To Access Your Information

The *Australian Privacy Act of 1988* gives you the right to access and correct this information. Please contact Info@luciditysoftware.com.au should you request further information.

If you are not satisfied with our response you may then take your complaint to the Office of the Australian Information Commissioner (<http://www.oaic.gov.au>).

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
Digital Signature Approval:			