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# QUALITY MANAGEMENT PROCEDURE

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Privacy Policy

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AFFORDABLE INTERLOCK SYSTEMS PTY LTD  
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## TABLE OF CONTENTS

<b>1. OBJECTIVE .....</b>	<b>3</b>
<b>2. DEFINITION .....</b>	<b>3</b>
<b>3. SCOPE .....</b>	<b>3</b>
<b>4. TYPES OF INFORMATION .....</b>	<b>3</b>
4.1 CLIENT INFORMATION .....	3
4.2 AFFORDABLE INTERLOCK SYSTEMS INFORMATION .....	3
i. Name of service agent .....	3
ii. Name of organisation including ABN details .....	4
iii. Contact details including email / phone .....	4
<b>5. GOVERNMENT AGENCIES.....</b>	<b>4</b>
<b>6. SERVICE AGENTS.....</b>	<b>4</b>
<b>7. DATA COLLECTION AGENCIES.....</b>	<b>4</b>
<b>8. DATA STORAGE, QUALITY, SECURITY AND ACCESSIBILITY.....</b>	<b>4</b>
8.1 DATA STORAGE (OFFSHORE) .....	4
8.2 DATA QUALITY .....	4
8.3 DATA SECURITY .....	4
8.4 DATA FROM JURISDICTION .....	4
8.5 DATA ACCESSIBILITY .....	5
<b>9. DISCLOSURE OF INFORMATION .....</b>	<b>5</b>
<b>10. PARTICIPANTS RESPONSIBILITIES FOR THIRD PARTIES.....</b>	<b>5</b>
<b>11. PRIVACY COMPLAINTS .....</b>	<b>5</b>



## 1. Objective

The primary intent of this policy is to explain Affordable Interlocks Pty Ltd (AIS) policy for the collection, storage, use and disclosure of participants' data.

## 2. Definition

Data means all information, including personal information (for example images) in connection with the use or maintenance of an Interlock. It includes (without limitation) communications about the use of the Interlock and Program participation and data logged by the Interlock (for example breaches of the program).

## 3. Scope

AIS abides by applicable state and federal privacy laws. Only information that is required by AIS and the applicable Jurisdiction in the delivery of alcohol interlock services is collected. Failure to provide such information will result in the inability of AIS to provide interlock services. Information includes the downloading of digital data from an interlock device.

## 4. Types of Information

The collection of information must be reasonable, accurate and purposeful. Clients may also ask information of AIS. In both cases information must be reasonable, accurate and purposeful.

### 4.1 Client Information

It may include but not limited to:

- i. Names (first, middle and last) and date of birth
- ii. Address details
- iii. Contact details
- iv. Concession information
- v. Images
- vi. Drivers licence details
- vii. Vehicle information
- viii. Credit information
- ix. Payment information
- x. Court information
- xi. Call recordings to and from customer service agents
- xii. Interlock information
- xiii. Customer surveys
- xiv. Other sensitive information with clients consent

### 4.2 Affordable Interlock Systems Information

It may include:

- i. Name of service agent

- ii. Name of organisation including ABN details
- iii. Contact details including email / phone.

## **5. Government Agencies**

When requested AIS will provide the appropriate jurisdiction (example TfNSW) with Data and the jurisdiction may use the Data provided by AIS for the purpose of performance monitoring and Program Evaluation, and for enforcing compliance with the Program and road transport legislation.

The jurisdiction may also disclose Data provided to it by the AIS to other government agencies and courts for use by those entities for the same purposes. The jurisdiction and government agencies may share the Data with their services provider (including auditors and legal advisors) for the purpose referred to above.

## **6. Service Agents**

AIS may also provide Data to its Service Agents for the purpose of them providing services in respect of the Participant's participation in the program.

## **7. Data Collection Agencies**

AIS or its Service Agents may also provide Participant's personal information (including name and address) to a licensed debt collection agency, that is compliant with Australian Privacy Principles and the Privacy Act 1988 (Cth), for the purposes of them providing debt collection services for AIS or Service Agent.

## **8. Data Storage, Quality, Security and Accessibility**

### **8.1 Data Storage (Offshore)**

ALCOLOCK AU does not store data offshore. Participant data is hosted by Amazon Web Services (AWS). AWS data servers are located in Sydney, Australia.

### **8.2 Data Quality**

Data that is collected must be accurate and complete. All reasonable efforts will be made to ensure data is kept up-to-date.

### **8.3 Data Security**

Personal information is stored in a combination of paper and electronic files. They are protected by security measures appropriate to the nature of the information.

### **8.4 Data from Jurisdiction**

The Participant consents also to their particular jurisdiction disclosing to AIS and ALCOLOCK AU information relating to the Participants expected Program completion data, including changes to that date, and severe financial hardship eligibility. AIS and ALCOLOCK AU will only use that information for the purposes stated by the particular jurisdiction (example, Queensland Department of Transport and Main Roads -TMR or Transport for New South Wales - TfNSW) when releasing the information and AIS will not disclose it to any third party.



## **8.5 Data Accessibility**

AIS believes in fair use. Individuals may review their personal information contained in AIS or ALCOLOCK Au files by contacting AIS. If an individual believes that any of their personal information is inaccurate, we will make appropriate corrections. All reasonable steps will be taken to ensure data is correct and updated/corrected when required.

## **9. Disclosure of Information**

Notwithstanding the general terms of this policy, the collection, use, and disclosure of personal information may be made outside of the terms herein to the extent provided for in any applicable privacy or other legislation in effect from time to time, or pursuant to court orders.

It may be necessary from time to time disclose information about you to relevant authorities and to other professionals, insurance providers and product issuers in connection with the alcohol interlock program where required to by law. In the event AIS considers it necessary to use or disclose information about you for purposes other than those detailed herein or related purposes, we will seek your consent.

## **10. Participants Responsibilities for Third Parties**

If the Participant permits a third party to use the AIS Interlock device then the Participant warrants that it has provided a copy of these privacy terms to the person and obtained their consent.

## **11. Privacy Complaints**

Should AIS receive a complaint relating to privacy, AIS is required to immediately advise the appropriate jurisdiction. Form Privacy Breach ALAU-FRM-0023 v1.0 is used to provide those details to the jurisdiction.

For further information please contact Affordable Interlock Systems Pty Ltd either by email on [enquiries@affordableinterlocks.com.au](mailto:enquiries@affordableinterlocks.com.au) or phone 1800-252-656