

## Human Resources Privacy Policy

This human resources privacy policy outlines the personal information handling practices for employees and prospective employees of Pinnacle Investment Management Group Limited and its related bodies corporate (**Pinnacle Group, we, us or our**). See our main privacy policy for when we handle personal information in wider circumstances.

### Purpose for which we collect, hold, use and disclose personal information

The Pinnacle Group keeps and handles human resources records to enable us to properly manage our business affairs and the employment of staff, as well as consultants and contractors.

The purpose of keeping records on candidates for employment (application files) is to allow us to assess the suitability of candidates for employment.

The following people may use personal information held on human resources files for the purposes set out above:

- Directors;
- Personnel who have a legitimate business need to have access to the Pinnacle Group's employment records; and
- Third party service providers.

### Personal information in human resources files

Human resources files collect and hold personal information which may include:

- employee, referee and emergency contact details;
- applications for employment and supporting documents;
- selection committee reports;
- employment contracts, and other records relating to terms and conditions of employment;
- details of financial and other personal interests supplied by employees and their immediate family members for the purpose of managing perceived or potential conflicts of interest;
- proof of Australian citizenship;
- certified copies of academic qualifications;
- records relating to salary, employment benefits and leave;
- medical certificates or health related information supplied by an employee or their medical practitioner;
- taxation details;
- banking information necessary to pay salary and wages;
- superannuation contributions;
- information relating to employees' training and development;
- information about an employee's performance.

### How we collect and hold personal information relating to human resources

At all times we try to only collect the information we need for the particular function or activity we are carrying out.

The main way we collect personal information about you is when you give it to us. For example, when you apply for a job vacancy, we collect personal information such as contact details and your employment history. The employment information we hold may also include our opinion about your suitability for a particular position.

### Third-party service provider access to and use of personal information

The Pinnacle Group may use third-party service providers to process job applications and manage the recruitment process (including reference checking). We may disclose personal information about prospective employees to third-party service providers for this purpose.

### Quality of personal information

The Pinnacle Group maintains and updates personal information in its human resources files as necessary, or when we are advised that the personal information has changed.

### Storage and security of personal information

The Pinnacle Group takes steps to protect the security and confidentiality of personal information it holds. These steps include password protection for accessing our electronic IT system, audit trails of electronic systems and physical access restrictions.

When no longer required, the Pinnacle Group destroys personal information in a secure manner. Application files are stored for 7 years and then destroyed in a secure manner.

### Disclosure of personal information overseas

The Pinnacle Group will generally only disclose human resources personal information to an overseas entity if you agree, or if we are authorised or required by law.

## Document Control

<b>Owner</b>	Chief Risk and Compliance Officer
<b>Approval</b>	Audit, Compliance and Risk Management Committee
<b>Version</b>	1.0
<b>Relates to</b>	Privacy
<b>Date last updated and reason for update</b>	April 2023 in view of significant data breaches at other major Australian corporations
<b>Primary Rules/Rationale</b>	Privacy Act General Data Protection Regulation
<b>Related policies</b>	Data Breach Response Plan
<b>Date of Sign off</b>	April 2023