

PRIVACY POLICY.



DATE	16 OCT 2026
DOCUMENT NO.	CFM-POL001 REV1.0 EXECUTED
COMPANY	Certa FM Pty Ltd (ACN 702 981 735, ABN 76 702 981 735)
POLICY OWNER	Monica Montanaro, Director
APPLIES TO	Everyone whose personal information Certa FM handles: clients' staff, workers, candidates, suppliers and website visitors
REVIEW	Annually, or sooner on a change in law or in the business

Revision	Date	Author	Summary of change
REV0.1 DRAFT	10 OCT 2026	Monica Montanaro	New policy written against the Australian Privacy Principles. EngCOR DOC004 was reviewed but is a website-cookie template that does not reference Australian law, so it was not adapted.
REV0.2 DRAFT	10 OCT 2026	Monica Montanaro	Company details (Certa FM Pty Ltd, ACN, ABN), Directors and contact details added.
REV0.3 DRAFT	14 OCT 2026	Jon Smirk	Merged with the certa.fm website privacy notice (former DOC004 REV1.0, now withdrawn): website form and quick check, Cloudflare and Formspre, server logs and cookies, overseas disclosure, changes to this policy.
REV0.4 DRAFT	14 OCT 2026	Jon Smirk	Open items closed: Jon Smirk appointed Privacy Officer; email and documents held in Microsoft 365 (SharePoint); small business status under the Privacy Act stated.
REV1.0 EXECUTED	16 OCT 2026	Jon Smirk	Approved and signed by both Directors on 16 Oct 2026. Text as REV0.4.

Approved by	Position	Signature	Date
Monica Montanaro	Director		16 OCT 2026
Jon Smirk	Director		16 OCT 2026

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1. About this Policy

This policy explains how Certa FM Pty Ltd (ABN 76 702 981 735) collects, holds, uses and discloses personal information, including through our website certa.fm, and how you can access or correct it or make a complaint. Certa FM handles personal information in line with the Australian Privacy Principles (APPs) in the *Privacy Act 1988* (Cth). Where Certa FM collects health information in Victoria it also complies with the Health Privacy Principles in the *Health Records Act 2001* (Vic), which apply to

organisations of any size. Where a government client's contract requires it, Certa FM is also bound by that client's privacy obligations as a contracted service provider.

Certa FM is currently a small business under the Privacy Act (annual turnover under \$3 million), so the Act applies to it directly only in limited cases, such as work under a Commonwealth contract. Certa FM has chosen to follow the APPs in all of its work, as Commonwealth and Victorian public sector clients require by contract.

2. What We Collect

Whose information	What we collect
Client staff and site contacts	Name, role, work contact details, and records of who requested, received or approved our services
Workers and contractors	Contact and identity details, right-to-work, qualifications and training, bank and tax details, emergency contacts, rosters and timesheets, site access records, and health information where needed for work (e.g. vaccination status for PC2/PC3 sites, health monitoring, injury records)
Candidates	Résumé, references, and screening results where a client requires them (e.g. police checks)
Suppliers and partners	Contact details of their people
Website visitors and enquirers	What you send us through the website form or by email (name, organisation, role, email address, phone number, details about your facility and, if you choose to include them, your quick check answers); standard server log data (see Section 3)

We collect information directly from you wherever we can. We may also collect it from your employer (our client or partner), referees, screening providers and public sources. Where we collect information about you from someone else, we take reasonable steps to let you know. We collect sensitive information (including health information and criminal history) only with your consent or where the law requires or allows it.

3. Our Website

When you send a message through the form on certa.fm, the details you enter are passed to Formspree, which delivers them to our admin@certa.fm inbox. If you tick any of the quick check questions on the Talk to us page, your score and the questions you left unticked are sent with your message. Nothing is sent until you press Send, and you can always email us instead.

The website is hosted by Cloudflare, which keeps standard server logs (such as IP address, browser type, the date and time and the page requested) to deliver the site and protect it from attack, and gives us traffic totals that do not identify you. The website does not use advertising or tracking cookies and does not run third-party analytics. If we add either, we will update this policy first. You can set your browser to refuse cookies at any time.

4. Why We Use It

We use personal information to deliver our services and keep records our clients rely on; to employ, roster, pay, train and keep our workers safe; to meet our legal, safety, quality and contractual obligations; to manage suppliers; to reply to enquiries made through our website or by email, and to respond to complaints; and to improve our services. We do not sell personal information. We send marketing only to people who have agreed to receive it, and every message includes a way to opt out.

5. Who We Disclose It To

We disclose personal information only for the purposes above, or as the law requires or allows, to: our clients (e.g. which worker performed a service, site access lists, training records a client audits); EngCOR, where it provides services to Certa FM under contract; partners and service providers (e.g. payroll, IT and cloud providers, Cloudflare for website hosting, Formsfree for the website form, screening, insurers, professional advisers); and regulators and authorities where required.

Overseas. Our email and documents are held in Microsoft 365, in our cloud-based SharePoint and Outlook, which may store or process data outside Australia. Cloudflare and Formsfree may store or process website data and enquiries in the United States and other countries. Where information is disclosed overseas, we take reasonable steps to ensure the recipient protects it consistently with the APPs.

6. How We Protect It

Personal information is stored in access-controlled cloud systems and, for paper site records, as each client directs. Security controls are set out in the Information Security Policy (CFM-DOC005). Health information is restricted to the people who need it. We destroy or de-identify personal information when it is no longer needed and no law or contract requires us to keep it.

7. Access, Correction and Complaints

You may ask for access to, or correction of, the personal information we hold about you by contacting our Privacy Officer. We respond within 30 days and do not charge for making a request. If we refuse, we will explain why in writing.

If you are concerned about how we have handled your information, contact our Privacy Officer first. We will acknowledge your complaint within 5 business days and aim to resolve it within 30 days. If you are not satisfied, you may complain to the Office of the Australian Information Commissioner (OAIC, oaic.gov.au) where the Privacy Act applies to us or, for health information in Victoria, the Health Complaints Commissioner.

8. Data Breaches

If personal information is lost or accessed without authorisation, we act immediately to contain it and assess whether serious harm is likely. Under the Notifiable Data Breaches scheme, an eligible data breach is notified to the OAIC and the affected individuals as soon as practicable, and an assessment is completed within 30 days. Affected clients are told as their contracts require.

9. Changes to this Policy

We review this policy at least every year, and sooner when our services, our systems or the law change. The current version is published at certa.fm, with its revision and effective date on the first page.

10. Contact

Privacy Officer: Jon Smirk, Director, Certa FM Pty Ltd, admin@certa.fm, 0401 888 648

This policy is published at certa.fm and is available free on request.