

## Privacy Statement for CONNECT Peers

Confidentiality is at the heart of the CONNECT Peer Support Program (“CONNECT”). The Virgin Australia Group (“we”, “us” or “our”) respects your right to seek support on a confidential basis and the confidential and sensitive nature of the information you discuss when you choose to speak to a Peer Support Volunteer (“PSV”).

We expect most team members who seek support as part of CONNECT (“Peers”) will only have basic personal information collected (such as an email address or phone number if you use that to seek support) and will receive support without your personal information being used or shared, except for basic administrative purposes such as setting up a support call.

However, sometimes (as set out in section 1 below) we will collect, use and share personal information about Peers, and this information may include health and other sensitive information. This Privacy Statement explains the situations in which we may collect personal information as part of CONNECT and how we will handle that personal information.

### 1. What personal information may we collect and when and how will we collect it?

We have designed CONNECT to provide you with confidential peer support so we won’t collect any information about your participation in CONNECT or your discussions with a PSV unless it’s unavoidable (such as when you send us information or contact us in an identifiable way) or really necessary, which will usually be for one of the reasons set out below.

When you speak to a PSV, they are required to make a record about your support case in our CONNECT case management system, but that record must be pseudonymised - this means that your real name should not be recorded.

If we do collect personal information about you in connection with CONNECT, we will generally limit the amount of information we collect to basic details. For example, this may occur if you email a PSV, send a Teams message to a PSV, email [connect@virginaustralia.com](mailto:connect@virginaustralia.com) or call CONNECT to speak with a PSV and you expressly identify yourself or the communication method reveals identifying information – for example, your name, email address or phone number.

However, sometimes circumstances may arise where we need to collect more identifiable information about you. For example, we may collect identifiable information from a PSV about the support provided to you, if:

- the PSV reasonably believes that identifying you will prevent or lessen a serious threat to somebody's life, health or safety (including your own), or to public health or safety;
- the PSV has reason to suspect that unlawful activity, misconduct of a serious nature, or an unsafe work practice, that relates to our functions or activities has been, is being or may be engaged in, and the PSV reasonably believes that disclosure is necessary in order for Virgin Australia to take appropriate action. For example, this may include a WHS Notifiable Incident and reports may be made via the Ethics Hotline and under the Whistleblower Policy; or
- the PSV is otherwise required or authorised by law to identify you. For example, this may occur in response to a subpoena, if you share information about child abuse with the PSV or we have regulatory investigation obligations (such as in response to a WHS Notifiable Incident).

### 2. If we collect your personal information, what will we use and hold it for?

If we collect your personal information for any of the reasons set out in section 1 above, we will take appropriate steps to keep this information safe. We may use and hold it for the purpose of:

- delivering and managing CONNECT, including to provide you with support through CONNECT;
- reviewing, reporting on and improving CONNECT;
- protecting and managing the protection of the life, health and safety of you, our people and our guests;
- managing our relationship with you, including determining your “fitness to operate”; and
- assessing and complying with legal, audit, insurance, reporting, record-keeping and investigation requirements and for safety and regulatory compliance purposes, including investigating unlawful activity, or misconduct of a serious nature, that relates to our functions or activities.

Subject to the circumstances in section 1 where you may be identifiable, where possible, we will use aggregate and de-identified information. For example, when reviewing, reporting on and improving CONNECT as a program, we will only use anonymous insights and statistics generated from the information we collect.

### **3. Who will we share your personal information with?**

As noted above, we don’t expect that we will usually need to share personal information about Peers. However, sometimes this will be necessary. We may share your personal information internally and externally on a ‘need-to-know’ basis for the purposes described under section 2 - *“What will we use and hold your personal information for?”*.

If we need to share your personal information, where practicable, we will limit the amount of information disclosed or share de-identified information.

### **4. Questions or concerns?**

If you have a question or concern in connection with CONNECT, including about the collection, use, access, correction, storage or disclosure of your personal information, you can contact the CONNECT team at [connect@virginaustralia.com](mailto:connect@virginaustralia.com). Such requests, questions and concerns will be assessed on a case by case basis.

### **5. Updates to this Privacy Statement**

Updates to this Privacy Statement will be published on the CONNECT website, available at [HOME | Connect Peer Support Program](#).

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