

# Information Management

## Policy 7 | Version 4.2

**We are committed to protecting the information rights of the public, our customers, our workers, and the organisation, and complying with legislation relating to the creation, capture, storage, disposal, and use of information.**

We understand the importance of information being collected, stored, and used appropriately. This Policy provides guidance to the Multicap Limited Board, all subsidiary Boards, management, and all workers regarding our expectations around the management of information including data, images and stories, as well as customer and business information.

### Scope:

This policy (and related document/s) applies to Multicap Limited and its subsidiary companies, related entities, and affiliates anywhere in Australia (collectively referred to as the Vertaview Group).

Members of the Vertaview Group include Allinto Australia Limited, Arbourwell Limited, Multicap Limited, and Open Minds Australia Limited (we/us).

### We will:

- ✓ Have a consistent approach for collecting and managing information across the organisation.
- ✓ Securely manage customer and worker information and records, whether in physical form or in data form to ensure privacy and confidentiality is maintained.
- ✓ Ensure proper and secure handling of business-related information necessary for services and functions.
- ✓ Manage access to records and data, ensuring access is only provided to authorised persons.
- ✓ Ensure information is easy to retrieve and that health and personal information is appropriately managed throughout its lifecycle.
- ✓ Ensure that internally and externally published or shared information is approved, appropriate, accurate and timely.
- ✓ Information Management capability is fostered and embedded across the organisation.
- ✓ Escalate information and data breaches in a timely manner.
- ✓ Periodically test our systems and controls around information management.

**We recognise** the importance of security of information for customers, their families, our workers, and our organisation as well as the need for simplicity in accessing information. All customers and workers have the right to privacy and confidentiality, and to decide who has access to information they have disclosed to the Vertaview Group.

**Our objective** is to have in place best practices for information management and protect the privacy of all individuals including our customers and our workers.

**Accountability** resides with the Group Chief Executive Officer who is accountable to the Multicap Limited Board for maintaining high quality information management systems and processes.

**We will comply** with all relevant legislative, regulatory, and legal requirements including data breach reporting and having appropriate internal controls in place.



Angela Tillmanns, Chair

May 2025



Damian Bell, GCEO

May 2025