

Privacy Policy

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POLICY STATEMENT

The purpose of this Privacy Policy is to provide information about the personal information Integrity collects, how that information will be handled, and how you can access your personal information or make a complaint about Integrity's handling of this information.

Integrity respects your right to privacy. We manage personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles (APPs)*. These principles and standards regulate most of our activities with respect to personal information collected, stored, used and disclosed by us.

We will only collect information that is necessary for the proper performance of our activities or functions. We do not collect personal information just because we think it could be useful at some future stage if we have no present need for it.

We do not routinely conduct criminal history checks and only do so in order to obtain relevant criminal history with regard to particular jobs you are offered or for which you are shortlisted. We do not collect or use personal information for the purposes of unlawful discrimination.

We may decline to record unsolicited personal information from or about you and may take such measures as we think appropriate to purge it from our systems.

We will need to collect personal information about you

Personal information is defined as:

- a) Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true or not; and
- b) whether the information is recorded in a material form or not.

Such information includes the opinions of others about your work performance (whether true or not), your work experience and qualifications, aptitude test results and other information obtained by us in connection with your possible work placements. Personal information includes sensitive information as defined in privacy legislation. It could include, for example, information obtained lawfully via a criminal history check.

When we collect your personal information:

- we check that it is reasonably necessary for our functions or activities as an employment agency;
- we check that it is current, complete and accurate. This will sometimes mean that we have to cross check the information that we collect from you with third parties, such as undertaking reference or qualifications' checks;
- we record and hold your information in our information record systems;

- we retrieve your information when we need to use or disclose it for our functions and activities. At that time we check that it is current, complete, accurate and relevant. This will sometimes mean that we have to cross check the information that we collect from you with third parties once again, especially if some time has passed since we last checked;
- subject to some exceptions, we permit you to access your personal information in accordance with the APP:12 of the **APPs**;
- we correct or attach associated statements to your personal information in accordance with APP:13 of the **APPs**;
- we destroy or de-identify your personal information when it is no longer needed for any purpose for which it may be used or disclosed provided that it is lawful for us to do so.

Sensitive Information

Sensitive information includes any information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association or professional or trade association or trade union, religious beliefs or affiliations, philosophical beliefs, sexual orientations or practices, criminal record, health information, genetic information, and now also includes biometric information used for automated biometric verification or biometric identification and biometric templates.

Kinds of information that we collect and hold

- Personal information that we collect and hold is information that is reasonably necessary for the proper performance of our functions and activities as an employment agency and is likely to differ depending on whether you are:
 - an Employee/a Potential Employee
 - a Client
 - a Referee

Employee/Potential Employee

The type of information we typically collect and hold about Employees/Potential Employees is information that is necessary to assess amenability to work offers and work availability, suitability for placements, or to manage their performance in work obtained through us and includes:

- candidate information submitted and obtained from the candidate and other sources in connection with applications for work;
- candidate name, age, contact details, gender, employment history, references, resume, medical history, emergency contact, taxation details, qualifications and payment details;
- work performance information;
- information about incidents in the workplace;
- information submitted and obtained in relation to absences from work due to leave, illness or other causes.

Client

The type of information we typically collect and hold about Clients is information that is necessary to help us manage the presentation and delivery of our services and includes:

- company name, contact details, location and nature of business;
- staff information;

- information about incidents in the workplace;
- placement history.

Referee

The type of information we typically hold about Referees is information that is necessary to help make determinations about the suitability of one of our Employees/Potential Employees for particular jobs or particular types of work and includes:

- referee name, position title, company name and contact details;
- circumstances that lead to being able to provide a reference;
- opinions about the Employees'/Potential Employees' work performance.

How your information will be collected

Integrity collects personal information only by lawful and fair means. Personal and sensitive information will be collected from you directly when you complete and submit one of our application/registration forms, or any other information in connection with your application to us for work.

Personal information is also collected when:

- We receive or give any reference about you;
- We receive results of inquiries that we might make of your former employers, work colleagues, professional associations or registration body;
- We receive the results of any competency or medical test;
- We receive performance feedback (whether negative or positive);
- We receive any complaint from or about you in the workplace;
- We receive any information about a workplace accident or incident in which you are involved;
- We receive any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved;
- You provide us with any additional information about you which is relevant while you are engaged with our services. We will not record or retain any unsolicited personal information where it is not relevant to our operations;

Received electronically through our technology systems.

Purposes for which we hold Personal Information

We primarily hold personal information for the following:

- Employment placement operations
- Recruitment
- Staff management
- Training
- Risk Management
- Client and business relationship management

- Statistical purposes and statutory compliance requirements.

- **Disclosures**

We may disclose your personal information for any of the purposes for which it is primarily held or for a related purpose where lawfully permitted.

Your personal and sensitive information may be disclosed to:

- Potential and actual employers and clients;
- Referees;
- Our insurers;
- Professional association/registration body where they have a proper interest in the disclosure of your personal and sensitive information;
- A Worker's Compensation body;
- Our contractors and suppliers e.g. our IT contractors and database designers;
- Any person with a lawful entitlement to obtain the information.

We may disclose your personal information where we are under a legal duty to do so, including circumstances where we are under a contractual or lawful duty of care to disclose information.

We do not share personal information about you with government agencies, organisations or anyone else unless one of the following applies:

- You have consented;
- You would reasonably expect, or have been told, that information of that kind is usually passed to those individuals, bodies or agencies;
- It is required or authorised by law;
- It will prevent or lessen a serious and imminent threat to somebody's life or health;
- The disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.

Outsourced Service Suppliers

We outsource a number of services to contracted service suppliers (CSPs) from time to time. Our CSPs may see some of your personal information. Typically our CSPs would include:

- IT contractors, database designers and internet service suppliers, some of whom may be offshore;
- Legal and other professional advisors;
- Insurance brokers, loss assessors and underwriters;
- Superannuation fund managers;
- Background checking and screening agents;

We take reasonable steps to ensure that terms of service with our CSPs recognise that we are bound by obligations to protect the privacy of your personal information and that they will not do anything that would cause us to breach those obligations.

Personal Information Quality – Employees/Potential Employees

We rely on you to tell us when there are changes to your personal information that we hold about you. This could be, for example, a change of address or employment status. If you do not provide accurate information:

- We may be limited in our ability to locate suitable work for you;
- We may be limited in our ability to place you in work.

Children, Minors and Persons under a Legal Disability

Determining the decision-making capabilities of a person who is under a legal disability can be a complex matter, often raising ethical and legal issues.

We endeavour to address each case individually with a view to deciding whether the individual is able to give consent or receive notifications based upon an assessment of whether the individual has sufficient understanding to comprehend the nature and quality of what is being proposed.

In some circumstances, it may be appropriate for a parent, guardian, holder of an enduring power of attorney (or like authority) or next of kin to be contacted when consent is required or when notification is to be given and where it is not practicable to obtain it from, or give it directly, to an individual.

Personal Information Security

We take reasonable steps to destroy or permanently de-identify personal information when it is no longer required for any purpose for which it may be used or disclosed, however, it is not always practicable to destroy or de-identify electronic data. Where it is not reasonable to destroy or permanently de-identify personal information in electronic form, we will take reasonable steps to prevent unauthorised access to it.

Data Cleanse

Integrity performs an annual data cleanse of candidates' personal information. The personal details of any candidate who has not been engaged by Integrity to work for a period of six months or more will be permanently removed from our database.

Photos and Images - Employees/Potential Employees

We will not request that you supply photographs or capture and retain photographic data of you in cases where simply sighting photographs or proof of identity documents would be sufficient in the circumstances. Where we are required to scan photographic identification and licences, we will:

- Only use or disclose the information for the purpose of collection;
- Only retain the scanned information for as long as necessary, consistent with collection purposes;
- Store the information securely and take all reasonable steps to prevent unauthorised access to this information.

Other Parties

We cannot guarantee that any recipient of your personal information will protect it to the standard to which it ought to be protected. The costs and difficulties of enforcement of privacy rights in foreign jurisdictions and the impracticability of attempting to enforce such rights in some jurisdictions will mean that we will need to seek your consent prior to disclosure.

Electronic Transactions

This section explains how we handle personal information collected from our website www.integritystaffing.net.au and by other technology in the course of electronic transactions.

It is important that you understand that there are risks associated with the use of the internet and you should take all appropriate steps to protect your personal information.

It is important that you:

- Know your rights: read this Privacy Policy and our Privacy Collection and Disclosure Statement.
- Be careful what information you share on the Web.
- Use privacy methods while using our website; control access to your search listing and profile.
- Make sure your anti-virus and data protection software are up to date.

Please contact our office by telephone or mail if you have concerns about making contact via the internet.

Sometimes, we collect personal information that individuals choose to give us via online forms or by email, for example when individuals:

- Ask to be on an email list such as a job notification list;
- Make a written online enquiry or email us through our website;
- Submit a resume by email or through our website.

Cloud Computing Services

In cases where we use cloud computing services we will take reasonable steps to ensure that:

- Disclosure of your personal information to the cloud service provider is consistent with our disclosure obligations under the Privacy Principles. This may include ensuring that we have obtained your consent, or that the disclosure is for purposes within your reasonable expectations;
- Disclosure is consistent with any other legal obligations, such as the restrictions on the disclosure of tax file number information or the disclosure by private employment agencies of work seeker details;
- Our Cloud computing service provider's terms of service recognise that we are bound by obligations to protect the privacy of your personal information and that they will not do anything that would cause us to breach those obligations.

Social Networking and Web Services – Employees/Potential Employees

In order to assess your suitability for positions and to assist you to find work, we will need to collect, use and disclose personal information about you. It has become common practice in some places for employment service providers to conduct background checking via social network media sites frequented by candidates.

We will not conduct background checking via social network media sites other than those that you identify and authorise us to check. We may conduct internet searches using search engines and entering your name and relevant identifying details.

Emails

Our technology system tracks emails received and sent and may include read receipt notifications to enable tracking.

When you provide us with your email address or your email address is received by us because you send us a message, the email address will only be used or disclosed for the purpose for which you have provided it. It will not be added to a mailing list or used or disclosed for any other purpose without your consent other than as may be permitted or required by law.

Call and Message Logs

Our telephone technology (systems and mobile phones) logs telephone calls and messages (sms) received and sent and enables call number display.

When your telephone number is received by us because you send us a message or phone us, the number will only be used or disclosed for the purpose for which you have provided it and it will not be added to a phone list or used or disclosed for any other purpose without your consent other than may be permitted or required by law.

Database

We use recruiting software and databases to log and record recruitment operations. We will log and record all communications we have with you.

Paperless Office

Recognising the environmental advantages and efficiencies it provides, we work in a partially paperless office. As a result of which, your paper-based communications with us may be digitised and retained in digital format and the paper-based communications destroyed.

It is therefore important that, except where specifically requested, you do not send us originals of any paper-based document and that you retain copies for your own records. Where we do request original paper-based documents we will return them to you once they are no longer required by us for the purpose for which they may be used or disclosed.

Privacy Policy and Procedure Review

Integrity will conduct a Privacy Review at least once per year. The Review will be undertaken by the Managing Director. The Review will consider:

- The flow of personal information;
- The consistency of collection of personal information; and
- The use of personal information.

and assess these against the current Privacy Policy and Procedure, Privacy Collection and Disclosure Statement and the Accessing, Amending and Disclosing of Personal Information documents.

The Reviewer will assess staff and candidate awareness and understanding of Integrity's Privacy policies and procedures by means of short surveys of randomly selected respondents.

The Review will identify any data which may have potentially serious adverse consequences if misused and discuss the appropriate mitigations with the Managing Director. Amendments to policies and procedures will be effected as quickly as is practicable.

The Review will also confirm that the individuals who have been nominated to respond to actual and potential breaches are still available, capable and willing to continue to do so.

A report will be provided to the Management Team for their information and input.

Future Changes

This policy may change over time in light of changes to privacy laws, technology and business practices. If you use our website regularly it is important that you check this policy regularly to ensure that you are aware of the extent of any consent, authorisation or permission you might give.

Adherence to RCSA Code for Professional Conduct

As a member of Recruitment, Consulting and Staffing Association Australia and New Zealand (RCSA) we must take reasonable steps to maintain the confidentiality and privacy of information obtained in the course of our professional practice. We must also take reasonable steps to ascertain the extent to which any information we collect may be confidential.

For information subject to Australian Law, the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* which amends the *Privacy Act 1988*, applies to Agility Staffing Pty Ltd, Agility Industrial Pty Ltd, and Agility Executive Recruitment Pty Ltd (trading as Integrity Staffing and Skilled Resources Group).

Access

Subject to some exceptions which are set out in privacy law, you can gain access to your personal information that we hold. Important exceptions include evaluative opinion material obtained confidentially in the course of our performing reference checks where disclosure would impact on the privacy rights of other people. In many cases evaluative material contained in references we obtain will be collected under an obligation of confidentiality, and which the communicator of that information is entitled to expect will be observed. We do refuse access if it would breach any confidentiality that attaches to that information or if it would interfere with the privacy rights of other people. If you wish to obtain your personal information you should contact our Managing Director whose contact details are below. You will need to be in a position to verify your identity. You should anticipate that it may take a little time to process your application for access. There may be a need to retrieve information from storage and review the information in order to determine what information

may be provided. We will acknowledge a request for access to information within 5 business days, and aim to respond within 30 calendar days.

Correction

If you find that any personal information that we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to correct it by contacting us.

We will take such steps as are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

If we have disclosed personal information about you that is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to notify the third parties to whom we made the disclosure and we will take such steps (if any) as are reasonable in the circumstances to give that notification unless it is impracticable or unlawful to do so.

For full information about how we access, amend and disclose personal information, please refer to our Accessing, Amending and Disclosing Personal Information Policy and Procedure.

How to Contact Us – Inquiries and Complaints

If you wish to contact us about your personal information you should contact our **Managing Director, Alex Jack**, via phone on **08 9327 5444** or email **alexj@integritystaffing.net.au** during office hours, **Monday – Friday; 7:00am – 5.30pm.**

You have the right to complain about our handling of your personal information if you believe that we have interfered with your privacy. If you are making a complaint about our handling of your personal information, it should first be made to us in writing addressed to our Managing Director whose contact details are listed above.

You can also make complaints to the Office of the Australian Information Commissioner.

Complaints may also be made to RCSA, the industry association of which we are a member.

NOTE: The Association Code and Dispute Resolution Rules do NOT constitute a recognised external dispute resolution scheme for the purpose of the APPs, but are primarily designed to regulate the good conduct of the Association's members.

When we receive your complaint:

- We will take steps to confirm the authenticity of the complaint and the contact details provided to us to ensure that we are responding to you or to a person authorised by you to receive information about your complaint;
- Upon confirmation we will write to you to acknowledge receipt and to confirm that we are handling your complaint in accordance with our policy;
- We may ask for clarification of certain aspects of the complaint and for further detail;
- We will consider the complaint and may make enquiries of people who can assist us to establish what has happened and why;
- We will require a reasonable time (usually around 30 calendar days) to respond;
- If the complaint can be resolved through our procedures for access and correction, we will suggest these to you as possible solutions;
- If we believe that your complaint may be resolved an alternative way we will suggest that to you, on a confidential and without prejudice basis in our response.

If the complaint cannot be resolved by means that we propose in our response, we will suggest you take your complaint to any recognised external dispute resolution scheme to which we belong or to the Office of the Australian Information Commissioner, www.oaic.gov.au.

Declaration – Employees/Potential Employees

Integrity takes all reasonable steps to ensure that your personal information is protected from misuse, loss and from unauthorised access, modification or disclosure. When no longer needed, your personal information will be securely destroyed.

You declare that the details given to Integrity in your registration form, curriculum vitae, written references, interview and telephone conversations are true and correct. You understand that if you withhold relevant information, or provide any information which is false or misleading, and you are placed in employment, you may be subject to disciplinary proceedings, including possible termination of employment.

If we are not successful in placing you in employment your personal information will be removed from our database after a period of six months. Unless you tell us otherwise, you agree to the processing of your personal information we hold about you

Relevant Legislation / Regulations:	<i>Fair Work Act 2009 (Cth)</i> <i>Privacy Act 1988 (Cth)</i>
Related Documents:	Confidentiality Policy Record Keeping Policy Data Breach Policy and Procedure Code of Conduct Policy Code of Conduct (RCSA)