

# WORKTRYBE PRIVACY POLICY

POLICY/PROCEDURE	EFFECTIVE DATE	
<b>WorkTrybe Privacy Policy</b>	<b>15 October 2020</b>	
APPLICATION	LAST REVISION	NO. OF PAGES
<b>WorkTrybe Pty Ltd.</b>	<b>30 May 2025</b>	<b>8</b>

## 1. Introduction

- 1.1. This document outlines WorkTrybe Pty Ltd (ABN 92 640 849 574) company policy in relation to how we manage personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles*.
- 1.2. WorkTrybe is required to collect, hold, use and/or disclose personal information that is reasonably necessary for the proper performance of our activities or functions. The personal information can be relating to individuals including but not limited to, candidates, clients, suppliers, referees, contractors and employees.
- 1.3. 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.
- 1.4. We may decline to collect unsolicited personal information from or about you and take steps to purge it from our systems.

## 2. What Personal Information Does the Company Collect and Hold

2.1. Personal information that we collect and hold is information that is reasonably necessary for the proper performance of our functions and activities. The information that the Company collects and holds is likely to differ depending on whether you are:

- A **Candidate**: if you are a candidate seeking employment with the Company or the Company's clients, the type of information that we typically collect and hold about Candidates is information that is necessary to assess amenability to work offers and work availability; suitability for placements; or to manage the performance in work obtained through us and includes:
  - ✓ Name
  - ✓ Address, phone number, e-mail address
  - ✓ Gender

- ✓ Date of birth
  - ✓ Employment history
  - ✓ References
  - ✓ Resume
  - ✓ Medical history
  - ✓ Emergency contact
  - ✓ Taxation details
  - ✓ Bank details
  - ✓ Qualifications
  - ✓ Passport or identification details
  - ✓ Employee identification number
  - ✓ Contents of any other identification provided to the Company for application or employment purposes
  - ✓ Any licenses provided to the Company for job applications or employment purposes
  - ✓ Citizenship and work authorisation status.
- A **Client**: If you are a Client, the type of information that 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:
    - ✓ Name
    - ✓ Address, phone number, e-mail address
    - ✓ Gender
    - ✓ Date of birth.
  - A **Referee**: If you are a Referee, the type of information that we typically collect and hold about Referees is information that is necessary to help to make determinations about the suitability of one of our Candidates for particular jobs or particular types of work and includes:
    - ✓ Name
    - ✓ Address, phone number, e-mail address
    - ✓ Current employment details
    - ✓ Your professional reference on the candidate.
    - ✓

### 3. Purpose for the Company to Collect, Hold, Uses or Discloses

#### Personal Information

3.1. The purposes for which we collect, hold, use and disclose your personal information are likely to differ depending on whether you are:

- For **Candidates**: Information that we collect, hold, use and disclose about Candidates is typically used for:
  - ✓ Work placement operations
  - ✓ Recruitment functions
  - ✓ Statistical purposes and statutory compliance requirements
  - ✓ Training and events.
  
- For **Clients**: Information that we collect, hold, use and disclose about Clients is typically used for:
  - ✓ Client and business relationship management
  - ✓ Recruitment & HR consulting outcomes
  - ✓ Marketing services to you
  - ✓ Statistical purposes and statutory compliance requirements
  - ✓ Training and events
  
- For **Referees**: Information that we collect, hold, use and disclose about Referees is typically used for:
  - ✓ To confirm identity and authority to provide references
  - ✓ Candidate suitability assessment
  - ✓ Recruitment functions

#### 3.2 Our Policy on Direct Marketing

The Company may utilise or disclose personal information for marketing purposes as follows:

- ✓ Contacting candidates while they are registered with us with details in relation to employment opportunities, market information and/or promotions.
- ✓ Sending job alerts or news to any subscribers.
- ✓ Provide direct marketing material or promotions to clients or referees that we have a relationship with.
- ✓ You can opt out of receiving further marketing communications from the Company should you not wish to receive by following the directions contained within emails from the Company and unsubscribing appropriately. We will remain compliant with anti-spam legislation.

- ✓ Personal information is not used or disclosed to any third parties for marketing purposes.

#### 4. How Your Personal Information is Collected

- 4.1. For Candidates personal information will be collected from you directly when you fill out and submit one of our application forms or any other information in connection with your application to us for work. We may also obtain personal information via email or other written mechanisms, over a telephone call, in person, through transactions, through our website or by communications technology.

We may also collect personal information about you from a range of publicly available sources including newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from publicly available sources for inclusion in our records we will manage the information in accordance with the [APPs](#) [select this link to access the OAIC Privacy Fact Sheet No 17 Feb 2013 (amended January 2017)] and our Privacy Policy.

- 4.2. For **Clients** personal information will be collected when you provide it to us for business or business related social purposes.

We may also collect personal information about you from a range of publicly available sources including newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from publicly available sources for inclusion in our records we will manage the information in accordance with the [APPs](#) [select this link to access the OAIC Privacy Fact Sheet No 17 Feb 2013 (amended January 2017)] and our Privacy Policy.

- 4.3. For Referees personal information about you may be collected when you provide it to us in the course of our reference checking on a Candidate with you and when we are checking information that we obtain from you about Candidates.

We may also collect personal information about you from a range of publicly available sources including newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from publicly available sources for inclusion in our records we will manage the information in accordance with the [APPs](#) [select this link to access the OAIC Privacy Fact Sheet No 17 Feb 2013 (amended January 2017)] and our Privacy Policy.

4.4. **Electronic Transactions:** 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
- ✓ Register as a site user to access facilities on our site such as a job notification board
- ✓ Make a written online enquiry or email us through our website
- ✓ Submit a resume by email or through our website.

It is important that you understand that there are risks associated with use of the Internet and you should take all appropriate steps to protect your personal information. It might help you to look at the OAIC's resource on [Internet Communications and other Technologies](#) [select this link to access the OAIC website resource]

You can contact us by telephone or post if you have concerns about making contact via the Internet.

## 5. How Your Personal Information is Held

5.1. Personal information is held in our Information Record System, which is the Company's Recruitment Management System and Customer Relationship Management System. This contains hard copy files and/or electric files and may include cloud servers. The files are retained until it is no longer needed for any purpose for which it may be used or disclosed at which time it will be de-identified or destroyed provided that it is lawful for us to do so. We take a range of measures to protect your personal information from:

- ✓ misuse, interference and loss; and
- ✓ unauthorised access, modification or disclosure.

## 6. Disclosures

6.1. We may disclose your personal information for any of the purposes for which it is primarily held or for a lawful related purpose. We may disclose your personal information where we are under a legal duty to do so. Disclosure will usually be:

- ✓ internally and to our related entities
- ✓ to our Clients
- ✓ to Referees for suitability and screening purposes

**6.2. Related Purpose Disclosures:** 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:

- ✓ Software solutions providers
- ✓ Background checking and screening agents
- ✓ Assessment solution providers
- ✓ I.T. contractors and database designers and Internet service suppliers
- ✓ Legal and other professional advisors
- ✓ Insurance brokers, loss assessors and underwriters
- ✓ Superannuation fund managers.

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.

**6.3. Cross-border disclosure of personal information:** We may disclose personal information to overseas recipients. If and when your personal information will be presented to an overseas recipient, the Company will contact you about the possible disclosure and take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to the information.

## 7. Access and Correction

- 7.1. Access to Personal Information:** If you wish to obtain access to your personal information you should contact our Privacy Officer at [Privacy@WorkTrybe.com](mailto:Privacy@WorkTrybe.com). You will need to be in a position to verify your identity.
- 7.2. Access to Personal Information:** If you find that 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 WorkTrybe at [Talent@WorkTrybe.com](mailto:Talent@WorkTrybe.com). We will take such steps as are reasonable in 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.
- 7.3.** 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.

## 8. Complaints

- 8.1 You have the right to complain about the 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.

You can make complaints about our handling of your personal information to our Privacy Officer at [Privacy@WorkTrybe.com](mailto:Privacy@WorkTrybe.com).

You can also make complaints to the [Office of the Australian Information Commissioner](#) [select this link to access *OAIC Website*]

Complaints may also be made to [RCSA](#) [select this link to access *RCSA Website/Code Complaints Page*], the industry association of which we are a member. RCSA administers a Code of Conduct for the professional and ethical conduct of its members. The RCSA Code is supported by rules for the resolution of disputes involving members.

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

### 8.2. 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 whom you have authorised 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 inquiries of people who can assist us to establish what has happened and why
- ✓ We will require a reasonable time (usually 30 days) to respond
- ✓ If the complaint can be resolved by procedures for **access and correction** we will suggest these to you as possible solutions
- ✓ If we believe that your complaint may be capable of some other solution we will suggest that solution 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 that you take your complaint to any recognised external dispute resolution

scheme to which we belong or to the Office of the Australian Information Commissioner [[Links to OAIC Website](#)].

## 9. How to Contact Us

If you have any questions in relation to privacy or wish to make an access request or a privacy complaint, please contact the WorkTrybe Privacy Officer on the details below:



[hello@worktrybe.com](mailto:hello@worktrybe.com)



[worktrybe.com](http://worktrybe.com)



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Albert Park, VIC, 3206  
The Commons: 388 George  
Street, Sydney NSW 2000

