



Think Talent Privacy Policy

Think Talent Pty Ltd

Think Talent Pty Ltd (ACN 169 153 735) ('Think Talent') is committed to protecting the privacy of your personal information. This Privacy Policy explains how Think Talent manages the personal and sensitive information that we collect, use, and disclose and how to contact us if you have any further queries about our management of, or would like to request access to, your personal or sensitive information.

1. INTRODUCTION

Think Talent Pty Ltd manages personal information in accordance with the Privacy Act 1988 and Australian Privacy Principles. Think Talent Pty Ltd is committed to protecting the privacy of all individuals and does not collect personal or sensitive information unless it is necessary for the performance of our tasks or functions.

1.1. APP ENTITY

Think Talent Pty Ltd manages personal information, as an APP Entity, under the Australian Privacy Principles (APPs).

1.2. INFORMATION FLOW

When we collect your personal information:

- We check that it is reasonably necessary for our functions or activities as a recruitment agency
- We check that it is current, complete, and accurate. This will sometimes mean that we must cross-check the information that we collect from you with third parties, which we won't do without your consent
- We record and hold your information in our Information Record System. Some information may be accessible to our third-party suppliers, refer to section 6. Disclosures
- 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 must cross-check the information that we collect from you with third parties (not without your consent) 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 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 if it is lawful for us to do so. We do not destroy or de-identify information that is contained in a Commonwealth Record.

2. TYPES 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 a recruitment agency and is likely to differ depending on whether you are:

- A Jobseeker
- A Client
- A Referee

2.1. FOR JOBSEEKERS

The type of information that we typically collect and hold about Jobseekers 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:

- Your resume or any registration paperwork
- Information recorded when you attend our office for an interview or participate in a telephone or remote interview with us
- Any references about you we receive
- Results of enquiries that we might make of your former employers, work colleagues, professional associations, or registration body
- Results of any competency or medical test we receive
- Performance feedback (whether positive or negative) we receive
- Any complaint from or about you in the workplace we receive
- Any information about a workplace accident 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 we receive
- Any additional information about yourself you provide us with.

2.2. FOR CLIENTS

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:

- Information on a role you provide us with
- Information in relation to a candidate you have met that you provide us with
- Information on a business, structure, contact details etc.

1.3. FOR REFEREES

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 Jobseekers for jobs or types of work and includes:

- Information you provide us with about a candidate, company, and contact information

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3. PURPOSES

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

- A Jobseeker
- A Client
- A Referee

3.1. FOR JOBSEEKERS

Information that we collect, hold, use, and disclose about Jobseekers is typically used for:

- Work placement operations
- Recruitment functions
- Answering your enquiries
- Keeping you informed of new developments that may be of interest to you
- Statistical purposes and statutory compliance requirements
- Communicating and marketing our services, advising you of news and industry updates, events, promotions, resources, and other information. Where we do so, you will be able to unsubscribe from such communications.
- Psychometric evaluations or skills tests
- Administrative tasks by third-party providers who provide services to us, such as IT consultants and administration providers. Some third-party suppliers may be located across international borders. These third parties comply with similar undertakings of privacy and confidentiality as Think Talent

Think Talent Pty Ltd may also seek your consent to collect, hold, use, and disclose your personal information for any other purpose not listed above.

If you do not give us the information we seek:

- 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.

3.2. FOR CLIENTS

Personal information that we collect, hold, use, and disclose about Clients is typically used for:

- Client and business relationship management
- Recruitment functions
- Marketing services to you
- Statistical purposes and statutory compliance requirements.

3.3. FOR REFEREES

Personal information that we collect, hold, use, and disclose about Referees is typically used for:

- To confirm identity and authority to provide references
- Jobseeker suitability assessment

- Recruitment functions.

3.4. OUR POLICY ON DIRECT MARKETING

Think Talent will advise you of news and industry updates, events, promotions, reports, resources, and other information. Where we do so, you will be able to unsubscribe from such communications. These communications will be delivered by Think Talent and no information will be provided to a third party for marketing purposes. Think Talent do not obtain customer lists from third parties for marketing purposes. Think Talent complies with The Spam Act 2003.

4. HOW YOUR PERSONAL INFORMATION IS COLLECTED

The means by which we will generally collect your personal information are likely to differ depending on whether you are:

- A Jobseeker
- A Client
- A Referee
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We collect information from third parties and publicly available sources, such as LinkedIn, when it is necessary for a specific purpose such as checking information that you have given us or where you have consented or would reasonably expect us to collect your personal information in this way.

Sometimes the technology that is used to support communications between us will provide personal information to us.

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 and our Privacy Policy.

4.1. FOR JOBSEEKERS

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.

Personal information is also collected when:

- You attend our office for an interview or participate in a telephone or Skype interview with us
- Via referees
- Results of any competency or medical test we receive
- You provide us with any additional information about yourself.

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4.2. FOR CLIENTS

Personal information about you may be collected:

- When you provide it to us for business or business-related social purposes
- When you fill out and submit one of our online enquiry forms.

4.3. FOR REFEREES

Personal information about you may be collected when you provide it to us:

- During our references with you or when we are checking information that we obtain from you about Jobseekers

4.4. ELECTRONIC TRANSACTIONS

You can visit our website and browse without the need to disclose any personal information. When you visit the Think Talent website, we record anonymous information such as the date and time of your visit, the server/IP address, which page was visited, and the information viewed and/or downloaded.

We collect personal information that individuals choose to give us via online forms or 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 CV or resume by email or through our website
- Submit a vacancy description by email or through our website
- Submit a timesheet via our website

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 might help you to look at the OAIC's resource on Internet Communications and other Technologies.

External sites that are linked to or from the Think Talent website are not under our control and you are advised to review their Privacy Statement. Users should note there are inherent risks associated with the transmission of information via the internet and you should, therefore, make your own assessment of the potential risk to the security of your information.

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

5. HOW YOUR PERSONAL INFORMATION IS HELD

Personal information is held in our Information Record System 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 if 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.

5.1. OUR INFORMATION RECORD SYSTEM

All data is stored electronically in the cloud managed by Microsoft 365 and Bullhorn enterprise security standards.

5.2. INFORMATION SECURITY

There are several measures used to keep your information secure.

- All data is stored electronically in the cloud managed by Microsoft 365 and Bullhorn enterprise security standards
- Access to the database and document management systems are only available to those who require such access.
- All staff and third-party suppliers are bound by confidentiality agreements regarding company and customer information.
- Visitors to our premises are always accompanied by a member of staff for the duration of the visit.
- Passwords are changed frequently.
- Hard copy information is disposed of in secure bins and shredded.
- There is a mandatory 2-factor authentication password policy for laptops, mobile phones, and portable storage devices.

6. DISCLOSURES

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.

6.1. RELATED PURPOSE DISCLOSURES

We outsource several services to contracted service suppliers (CSPs) or third-party suppliers from time to time. Our CSPs may see some of your personal information. Typically, our CSPs would include:

- Software solutions providers.
- I.T. contractors and database designers and Internet service suppliers.
- Legal and other professional advisors.

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- Insurance brokers, loss assessors and underwriters.
- Superannuation fund managers.
- Background checking and screening agents.
- Administration facilitators.

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.

6.2. CROSS-BORDER DISCLOSURES

Some of your personal information may be accessible to overseas third-party suppliers, such as software maintenance in the UK and US and administration facilitators in India. To the best of our ability Think Talent Pty Ltd do everything possible to ensure that suppliers comply with their own countries Privacy Policy, the Australian Privacy Act 1988 and Privacy Principle and the Think Talent Privacy Policy. These suppliers only have access to information, they do not use any personal information.

7. ACCESS & CORRECTION

Subject to some exceptions set out in privacy law, you can gain access to your personal information that we hold.

Important exceptions include evaluative opinion material obtained confidentially during our performing reference checks; and access that would impact on the privacy rights of other people. In many cases evaluative material contained in references that we obtain will be collected under obligations of confidentiality that the person who gave us that information is entitled to expect will be observed. We do refuse access if it would breach confidentiality.

We aim to acknowledge access and correction requests as soon as possible and commit to resolve all complaints no later than 30 days. However, there may be instances where this is not possible due to the contents of the complaint. In such circumstances, we will respond to your complaint in a reasonable and practical time.

7.1. ACCESS POLICY

If you have any questions or concerns about how we manage your personal or sensitive information, or would like to request a copy of the personal information we hold about you, please contact:

The Privacy Officer
Think Talent Pty Ltd
Level 20/ 31 Queen Street
Melbourne VIC 3000
Email: finance@thinktalent.com.au

Think Talent will provide you with access to your personal information if practicable and, will take reasonable steps to amend any of your personal information which is

inaccurate or out of date. We will not charge you for making the request to correct your information, correcting the information, or associating a statement.

7.2. CORRECTION POLICY

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 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.

You may also request that Think Talent stops using your information and contacting you and we will comply with your request. However, if this involves a request for deletion of your file, please be aware that we may not be required or able to do so, particularly where your file also holds information about our clients.

8. COMPLAINTS

If you consider a breach of the applicable privacy laws or your rights in relation to privacy has occurred, you may contact us, and we will attempt to resolve your complaint.

If you do not consider our response satisfactory, you may contact the Australian Privacy Commissioner at its website www.oaic.gov.au or by telephone on 1300 363 992.

You have a right to complain about our handling of your personal information if you believe that we have interfered with your privacy.

8.1. COMPLAINTS PROCEDURE

If you are making a complaint about our handling of your personal information, it should first be made to us in writing.

The Privacy Officer
Think Talent Pty Ltd
Level 20/ 31 Queen Street
Melbourne VIC 3000
Email: finance@thinktalent.com.au

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

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8. AMMENDMENTS

This Privacy Policy updated on the 20/12/2021

The Privacy Policy may be updated from time to time. To obtain a copy of the latest version at any time, visit our website at www.thinktalent.com.au or contact us by email at finance@thinktalent.com.au