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# Predictus Search

## Privacy and Cookies Policy

Version: June 2026

Predictive Search Pty Ltd (ABN 45 637 454 605) trading as Predictus Search

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Predictive Search Pty Ltd (ABN 45 637 454 605), trading as Predictus Search (“Predictus Search”, “we”, “us” or “our”), provides executive and senior management recruitment services in the healthcare and life sciences sectors. We are based in New South Wales, Australia.

We are committed to protecting the privacy of the personal information we collect and hold about candidates, clients, referees, website visitors and other individuals. We handle personal information in accordance with the Privacy Act 1988 (Cth) (“Privacy Act”) and the Australian Privacy Principles (“APPs”), and with the other laws described in this Policy.

This Policy explains what personal information we collect, how and why we collect it, how we use, store, secure, disclose and dispose of it, how we use artificial intelligence (AI) tools, how we disclose information overseas, and how you can access or correct your information or make a complaint.

### 1. The kinds of personal information we collect

The personal information we collect depends on your relationship with us. We collect:

#### Candidates

- Identity and contact details — name, postal and email address, telephone number(s), and links to professional profiles (e.g. LinkedIn);
- Career and professional information — curriculum vitae, employment and career history, qualifications, skills, professional memberships, remuneration and benefits expectations, references and referee details, and your suitability and motivation for a role;
- Assessment information — interview notes, our and our clients’ assessments, psychometric or skills assessment results (where conducted), and outcomes of background, reference and (where relevant to a role) qualification or probity checks;

Sensitive information — we only collect sensitive information (such as health information relevant to reasonable adjustments, or criminal-history information where it is a genuine requirement of a role) where it is reasonably necessary for our functions and, except where the law otherwise permits, with your consent (see section 3).

#### Clients (and their personnel)

- Business contact details, role and seniority of the people we deal with, and information about the organisation, the engagement and the position being recruited.

#### Referees

- Name, role, relationship to the candidate and contact details, together with the reference information you provide about a candidate.

#### Website visitors

- Information you provide through our website (e.g. enquiry forms), and technical information collected automatically through cookies and similar technologies (see section 11), such as IP address, device and browser type, and pages viewed.

## 2. How we collect personal information

Wherever it is reasonable and practicable, we collect personal information directly from you — for example when you send us your CV, complete a form, speak with us, or attend an interview.

Because we conduct executive search, we also collect personal information about candidates from third-party and publicly available sources — for example professional networking sites (such as LinkedIn), online directories and publications, referrals from people in our network, and from referees you nominate. Where we collect your information from someone other than you, we will, where reasonable, take steps to notify you of the collection and the matters in this Policy (APP 5), unless you would reasonably expect us to hold the information or an exception applies.

## 3. Sensitive information and consent

Sensitive information (including health, criminal record, and similar categories) is given additional protection under the APPs. We collect sensitive information only where it is reasonably necessary for our recruitment functions and, unless an exception under the Privacy Act applies, only with your consent. You may decline to provide sensitive information, although this may affect our ability to put you forward for a particular role.

## 4. Why we collect, hold and use personal information

We collect, hold and use personal information for purposes connected with our recruitment and related services, including to:

- assess your suitability for current and future roles and present you to relevant clients (candidates), with your knowledge;
- source, evaluate and shortlist candidates and manage searches for our clients;
- conduct interviews, reference checks and, where relevant to a role, background or probity checks;
- manage our relationship with you, respond to enquiries, and meet our contractual, legal and record-keeping obligations;
- with your consent or where you would reasonably expect it, keep you informed about relevant opportunities and market insights; and
- maintain and secure our systems, including our candidate and client relationship-management (CRM) system.

We will only use or disclose your personal information for the purpose for which it was collected, for a related purpose you would reasonably expect, where you have consented, or where the law otherwise permits or requires (APP 6).

## 5. Our use of artificial intelligence (AI)

We use commercially available AI tools to help us work more efficiently — for example to summarise CVs and documents, draft correspondence, and organise information. Our use of AI is guided by the following principles, consistent with the Office of the Australian Information Commissioner's (OAIC) guidance on privacy and commercially available AI products and the Australian Government's Voluntary AI Safety Standard:

- Human oversight — a person (the Director) reviews AI-assisted outputs. We do not make decisions that have a legal or similarly significant effect on you (such as whether to shortlist or recommend you) by automated means alone; a human always makes and is responsible for those decisions.

- Purpose limitation — we only input personal information into AI tools where it is reasonably necessary for the task, and we do not input sensitive information into general-purpose AI tools unless appropriate protections are in place.
- Accuracy — we treat AI-generated content as a draft to be checked, not as fact, and we verify information before relying on it.
- Transparency — we are open about our use of AI and will answer questions about it. We do not use your information to train public AI models.

The AI tools we currently use are ChatGPT, Claude, Microsoft Copilot and Apollo AI. These tools are configured so that the information we input is not used to train the providers' AI models.

From 10 December 2026, where an entity uses personal information in computer programs to make decisions that could significantly affect an individual's rights or interests, the Privacy Act will require additional transparency about that use. We will update this Policy to reflect any such use before that date.

## 6. When we disclose personal information

We do not sell your personal information. We disclose personal information only as needed for the purposes described in this Policy, including to:

- clients — we provide candidate information to the relevant client for a role, with the candidate's knowledge and, where appropriate, consent;
- referees and verification providers — to conduct reference and, where relevant, background checks;
- service providers — such as our CRM, IT, email, cloud-storage and professional advisers, who are bound to protect personal information and use it only to provide services to us; and
- others — where required or authorised by law, or with your consent.

## 7. Disclosure of personal information overseas

Some of our service providers — including our CRM and our email, document and cloud-storage providers — store or process personal information on servers located outside Australia, or are operated by companies based overseas. This means your personal information may be disclosed to, or accessible from, overseas recipients.

The countries in which these recipients are likely to be located include the United States, the United Kingdom, the European Union, Canada, South Africa, India and China, and may include other countries in which our service providers operate. Before disclosing personal information overseas, we take steps that are reasonable in the circumstances to ensure overseas recipients handle it consistently with the APPs (APP 8).

## 8. How we store and secure your information (including our CRM)

We hold most personal information electronically in our CRM and associated business systems. We take steps that are reasonable in the circumstances to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure (APP 11), including:

- access controls — access to the CRM and our systems is strictly limited to the Director and any authorised service providers on a need-to-know basis;
- technical safeguards — password protection, multi-factor authentication where available, encryption in transit, and up-to-date device and account security; and

- operational measures — confidentiality obligations on service providers and prompt removal of access when no longer required.

No method of transmission or storage is completely secure; while we strive to protect your information, we cannot guarantee absolute security.

Notifiable data breaches: if a data breach occurs that is likely to result in serious harm and to which the Notifiable Data Breaches scheme (Part IIIIC of the Privacy Act) applies, we will assess it promptly and, where required, notify affected individuals and the OAIC.

## 9. How long we keep your information, and destruction

We keep personal information only for as long as it is needed for the purposes described in this Policy, or as required by law. Because recruitment relationships are often long-term, we may retain candidate information so we can consider you for suitable future roles, unless you ask us to remove it.

When personal information is no longer needed and we are not required to retain it, we take reasonable steps to destroy it or to de-identify it (APP 11.2). You can ask us to delete your information at any time (see section 10), and we will do so unless we are required or permitted by law to keep it.

We maintain a separate Data Retention and Destruction Schedule that sets out how long we keep each category of information and when we destroy or de-identify it. In particular, we retain engagement and financial records for seven years to meet our tax and limitation-period obligations.

## 10. Accessing and correcting your information

You may request access to the personal information we hold about you, and ask us to correct it if it is inaccurate, out of date, incomplete, irrelevant or misleading (APP 12 and APP 13). There is no charge to make a request.

To make a request, contact our Privacy Officer at [privacy@predictussearch.com](mailto:privacy@predictussearch.com). We will respond within a reasonable period (ordinarily within 30 days). If we cannot give access or make a correction, we will tell you why in writing and explain how you can complain.

## 11. Cookies and website analytics

Our website uses cookies and similar technologies to help it function, to remember your preferences, and to understand how the site is used. Cookies are small files stored on your device. We use:

- strictly necessary cookies — required for the website to operate; and
- analytics and functional cookies — to measure and improve how the website performs.

The third-party tools we currently use are Google Analytics and the LinkedIn Insight Tag, together with analytics information provided by our website developer, Shazamme Inc. You can control or delete cookies through your browser settings; if you disable cookies, some parts of the website may not work properly.

## 12. Direct marketing

Where permitted, we may send you information about relevant opportunities or market insights. You can opt out at any time by using the unsubscribe facility in our communications or by emailing [privacy@predictussearch.com](mailto:privacy@predictussearch.com). We will action your request promptly (APP 7 and the Spam Act 2003 (Cth)).

### 13. Equal opportunity and anti-discrimination

We conduct recruitment consistently with applicable anti-discrimination and equal-opportunity laws, including the Anti-Discrimination Act 1977 (NSW) and the Commonwealth anti-discrimination Acts (covering race, sex, disability and age) and the Fair Work Act 2009 (Cth). We do not collect or use information about your protected attributes to treat you less favourably, and we assess candidates on merit.

### 14. Complaints

If you have a privacy complaint, please contact our Privacy Officer at [privacy@predictussearch.com](mailto:privacy@predictussearch.com). We will acknowledge your complaint and aim to resolve it within a reasonable time (ordinarily 30 days).

If you are not satisfied with our response, you can complain to the Office of the Australian Information Commissioner (OAIC): [www.oaic.gov.au](http://www.oaic.gov.au), by phone on 1300 363 992, or by post to GPO Box 5288, Sydney NSW 2001.

### 15. Individuals in the EU or UK

If you are located in the European Union or the United Kingdom, additional rights may apply to you under the GDPR or UK GDPR. Please contact us at [privacy@predictussearch.com](mailto:privacy@predictussearch.com) and we will work with you to address your request.

### 16. Changes to this Policy

We may update this Policy from time to time to reflect changes in our practices or the law. The current version will always be available on our website, and the version date appears at the top of this Policy.

### 17. How to contact us

Privacy Officer — Predictus Search

Email: [privacy@predictussearch.com](mailto:privacy@predictussearch.com)

Post: Level 24, International Towers 3, 300 Barangaroo Avenue, Sydney NSW 2000