# **Privacy Policy**



#### Introduction

At Talent Quarter ('the Company', 'we', 'us' or 'our') we manage personal information in accordance with the Privacy Act 1988 and Australian Privacy Principles. We only collect information that is reasonably 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 may decline to collect unsolicited personal information from or about you and take steps to purge it from our systems.

By following the links in this document, you will be able to find out how we manage your personal information as an APP Entity under the <u>Australian Privacy Principles (APPs)</u>.

### **Information Flow**

When we collect your personal information:

- We check that it is reasonably necessary for our functions and activities as a recruitment and on-hire firm;
- We check that it is current, complete and accurate. This will sometimes mean that
  we will cross check the information that we collect from you with trusted third
  parties;
- We record and hold your information in our Information Record System;
- Some information may be disclosed to overseas recipients;
- 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 will cross check the information that we collect from you with trusted 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 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. We do not destroy or de-identify information that is contained in a Commonwealth Record.

# 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 a recruitment and on-hire firm and is likely to differ depending on whether you are a Jobseeker, a Client or a Referee.

### For Jobseekers

Other than the everyday information such as your contact details, 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:



- Work history, skills and experience typically supplied by you in the form of a resume or CV and qualification certificates and/or transcripts.
- Nominated references and performance reviews the opinions of others about your work performance, your work experience and qualifications.
- Skills and aptitude test results any test results supplied by you, a trusted third party or for any test that you have undertaken specifically for Talent Quarter.
- Expectations availability, preferences and expectations relating to potential work offers, e.g. salary expectations.
- Sensitive information this may be collected regarding particular jobs you are offered or for which you are shortlisted, e.g. relevant medical history or criminal history.

### 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:

- Contact details name, position, telephone number(s), email address(es), postal address, etc.
- Company details industry, services provided, organisational structures, technologies used, etc.
- Preferences and needs typical skill sets required, marketing material and event interests, etc.
- Information and documentation to ensure Workers Health and Safety obligations are met this includes certificates of currency and workers compensation policies.

#### 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 particular jobs or particular types of work and includes:

- Referee contact details name, position, company, telephone number(s), email address(es), postal address, etc
- Confirmation of the following, the jobseekers:
  - o Employment and position.
  - o Performance.
  - Work ethics.
  - o Interpersonal skills.
  - o Reason for leaving role.

### **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 or a Referee. The following section is also relevant to our use and disclosure of your personal information.



#### For Jobseekers

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

- Our assessment of the jobseeker's suitability for registration with us;
- The necessary validation (including from trusted third-party sources) of the jobseeker's resume, CV, nominated references, or stated qualifications, experience, training or abilities;
- The jobseeker's actual or possible work placement(s);
- The jobseeker's performance appraisals;
- Any test or assessment (including medical tests and assessments) that the jobseeker might be required to undergo;
- Our assessment of the jobseeker's ongoing performance and prospects;
- Our identification of the jobseeker's training needs;
- Suggestions we may make to the jobseeker, whilst they remain registered with us, for further training in connection with work of the type that they are seeking through us;
- · Any workplace rehabilitation in which the jobseeker and we are involved;
- Our management of any complaint, investigation or inquiry in which you are involved;
- Any insurance claim or proposal that requires disclosure of the jobseeker's personal or sensitive information;
- Any reference that we may give concerning the jobseeker's work;
- Marketing services to you;
- Statistical purposes and statutory compliance obligations.

#### 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.

### For Referees

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

- Confirming the identity and authority to provide references;
- · Jobseeker suitability assessment;
- · Recruitment functions.

### **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 or a Referee.



We sometimes collect information from trusted third parties and publicly available sources 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 - see the section in this policy on Electronic Transactions and Cookies

See also the section on Photos and Images

#### 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 or to find a role through 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 <u>APPs</u> and our Privacy Policy.

#### For Clients

Personal information about you may 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 and our Privacy Policy.

### For Referees

Personal information about you may be collected when you provide it to us in the course of our checking jobseeker references with you and when we are checking information that we obtain from you about jobseekers.

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 <a href="#APPs">APPs</a> and our Privacy Policy.

### Photos & Images

We will not request that you supply photographs, scan photo ID, or capture and retain video image data of you in cases where simply sighting photographs or proof of identity documents would be sufficient in the circumstances.

#### **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 Office of the Australian Information Commissioner's (OAIC) resources at <a href="https://www.oaic.gov.au/privacy/your-privacy-rights">https://www.oaic.gov.au/privacy/your-privacy-rights</a>.

#### Cookies

What are browser cookies and what do they do?

'A cookie (also tracking cookie, browser cookie, and HTTP cookie) is a small piece of text stored on a user's computer by a web browser.' – Wikipedia. The main purpose of cookies is to identify users and possibly prepare customized Web pages for them. When you enter a website using cookies, you may be asked to fill out a form providing such information as your name and interests. This information is packaged into a cookie and sent to your Web browser which stores it for later use. The next time you go to the same Web site, your browser will send the cookie to the Web server. The server can use this information to present you with custom Web pages. So, for example, instead of seeing just a generic welcome page you might see a welcome page with your name on it.' – Webopedia.

### Third Party Cookies & Tracking

Talent Quarter uses Google Analytics and other forms of analytics to track website traffic and website usage for all our websites. Google Analytics cookies are used to store information, such as what time the current visit occurred, whether the visitor has been to the site before, and what site referred the visitor to the web page. This information is specific to the individual domains and websites within Talent Quarter.

<u>Google Analytics' Terms of Service</u> prohibits the use of its service for the collection of personally identifiable information, such as your name, address, email address or any other data that can be reasonably linked to such.

# Opting out of Google Analytics

A browser <u>Opt-Out ad-on</u> is provided, should you not want to be tracked, for any reason, by Google Analytics. This tool prevents Google Analytics from tracking you but does not prevent data from being sent to Talent Quarter's servers nor any other tracking services/tools Talent Quarter may use.

How Talent Quarter Handles Cookies and Data on Our Websites

Cookies are an essential part of the workings of our website. Talent Quarter's cookies are first-party cookies and are used only as part of the navigation and do not record any personal information of anyone using the website. Talent Quarter's website cookies are used ONLY within our individual websites. No data is automatically transferred between our domains except for services that reasonably require such data transference (i.e. Job searches). In such cases, we only pass the specific service data required for the proper functioning of the service. We do not, for any reason, directly access the data provided from these cookies for any purposes outside the reasonable functioning of the website



and/or services offered within the website.

Any personal details which you submit to us (e.g. name, address, phone and email details, or any other information volunteered by you) through the website are held by Talent Quarter for its own use for the purposes of recruitment and/or related services/activities.

By submitting your personal data, you consent to it being processed by Talent Quarter to be used, within reason, for the prosecution of its business. We may use this data to make you aware of additional services that may be of interest to you, or any changes to the site. It is your responsibility to ensure that your Personal Data is accurate and up to date and to inform us of any changes that need to be made.

You have the opportunity to send us your resume or CV online. We guarantee that this resume or CV will not appear on the website but may be stored on our internal database to assist in finding you a job placement. We will make every effort to ensure your resume and CV is kept secure. For the purposes of finding a wider range of opportunities for you, Talent Quarter, may, at times, share your detail/information with our offices in other countries/regions that Talent Quarter operates within. For the purposes of the recruitment process, we may share your details/information with employers/3rd party companies/individuals. In these instances where your details are shared outside Talent Quarter, we will seek your approval prior to making your details available.

Talent Quarter maintains email lists. When you registered your details, you agreed to optin and receive emails from us. Your details will be stored on a database, and we will occasionally email you to keep you informed about new vacancies that are appropriate to you, or any new services available. If you do not wish to receive this e-mail service, please email us at hello@talentquarter.com

#### How Your Personal Information Is Held

Personal information is held in our Applicant Tracking Systems 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, unauthorised access, modification or disclosure.

### Our Information Record System

Talent Quarter uses several databases to store personal information, some of which are cloud-based. As such, personal information is accessible and may be held on portable devices such as mobile phones, laptop computers or in diaries operated and held by our employees.

#### Information Security

With the majority of the personal information we collect and hold being of an electronic format (soft copy), Talent Quarter has policies relating to systems access, ensuring that:

- Access to systems and related system permissions is granted based on the individual employee's role within the organisation; and
- Access to systems is immediately revoked on the termination of an employee.



As password protection is a key feature of information security, Talent Quarter's password policy ensures that:

- Passwords are forced to be 'strong' passwords, e.g. a forced minimum number of characters, inability to use the same password within a set number of iterations, etc; and
- Computers and laptops within Talent Quarter's offices automatically lock after a short period of inactivity and cannot be unlocked without a valid password.
- Personal or sensitive information contained in a hard-copy format is stored securely when not in use.
- When hard-copy documentation containing personal or sensitive information is no longer required, each Talent Quarter office has a secure disposal unit in which to deposit the documentation for its ultimate destruction.

#### THIRD PARTY PARTNERS

We work in partnership with several trustworthy third-party organisations to collect, store and analyse certain information.

#### **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.

# **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;
- I.T. contractors and database designers and Internet service suppliers;
- Legal and other professional advisors;
- Insurance brokers, loss assessors and underwriters;
- Superannuation fund managers;
- Background checking and screening agents; and
- Auditors.

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.

#### Overseas Disclosures

Some of your personal information is likely to be disclosed to overseas recipients. 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 in some instances, we will need to seek your consent to disclosure.



#### 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 in the course of our performing reference checks,
- Access that would impact 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.

# **Access Policy**

If you wish to obtain access to your personal information you should contact us to submit your request. We will require a reasonable time (usually 30 days) to respond. You will need to be able to verify your identity before any access will be granted. In some cases, we may impose a moderate charge for providing access to personal or sensitive information. We will not charge you simply because you lodge a request for access.

# **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.

### Complaints

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

### Complaints Procedure

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 Compliance and Governance Lead, whose contact details are <a href="mailto:qovernance@talentquarter.com">qovernance@talentquarter.com</a>

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

Complaints may also be made to the Recruitment, Consulting and Staffing Association of Australia & NZ (RCSA), 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.

# 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 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 <u>Office of the Australian Information Commissioner</u>.

### **CHANGES TO OUR PRIVACY POLICY**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on our website.

#### **CONTACT US**

General Enquiries: Phone: 1800 879 500

Email: info@talentquarter.com

SYDNEY PERTH

A: Suite 9.02, Level 9/95 Pitt St, Sydney NSW 2000 A: Level 10/111 St Georges Terrace, Perth WA 6000

### **BRISBANE**

Level 6, 10 Felix St, Brisbane, QLD, 4000

