

# Privacy Policy

## 1. Introduction

We manage personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles*. This policy applies to information collected by Complete Recruitment Solutions Pty Ltd.

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 Australian Privacy Principles (APPs).

You will also be able to find out about the information flows associated with that information.

If you have any questions please [contact us](#).

### 1.1. APP Entity

Complete Recruitment Solutions Pty Ltd manages personal information, as an APP Entity, under the Australian Privacy Principles (APPs).

Because we are a contracted service provider to a range of Commonwealth, State and Territory government agencies, it sometimes becomes necessary for us to collect and manage personal information as an Agency under different privacy arrangements.

If you wish to know whether this applies to you, please [contact us](#).

### 1.2. Information Flow

When we collect your personal information:

- we check that it is reasonably necessary for our functions or activities
- 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;
- we record and hold your information in our Information Record System.
- 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 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.

## 2. 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 Consultancy & Labour Hire Company and is likely to differ depending on whether you are:

- a Workseeker
- a Client
- a Referee

### 2.1. Workseeker

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

- licences and other forms of identification
- trade and tertiary certificates
- resumes/work history
- referees and visa information if applicable
- tax file number, superannuation, and bank account details, if applicable.

### 2.2. 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:

- ABN/ACN
- Contact details



### **2.3. Referees**

The information that we typically collect and hold about Referees is information that is necessary to help make determinations about the suitability of one of our Workseekers for particular jobs or particular types of work.

## **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 Workseeker
- a Client
- a Referee

### **3.1. Workseeker**

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

- work placement operations;
- recruitment functions; and
- statistical purposes and statutory compliance requirements

### **3.2. 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; and
- statistical purposes and statutory compliance requirements.

### **3.3. Referees**

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

- to confirm identity and authority to provide references;
- Workseeker suitability assessment; and
- recruitment functions.

### **3.4. Our Policy on Direct Marketing**

- No personal information will be used for marketing purposes directly or by a third party without your prior consent;
- Client & Candidate lists are NEVER obtained from third parties for marketing purposes;
- Personal information would only flow to third parties such as a specific candidate or client on the strict and written approval from either party;
- You have the ability to opt out of any marketing or bulk emails by clicking the 'opt-out' button you reply with opt out on the email;
- Complete Recruitment Solutions adheres to the requirements of the anti-spam legislation.

## **4. How your personal information is collected**

We sometimes collect information from 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

See also the section on Photos & Images.

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

- a Workseeker
- a Client
- a Referee

### **4.1. Workseekers**

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 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.

#### 4.2. 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.

#### 4.3. Referees

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

- in the course of checking Workseeker references with you and when we are checking information that we obtain from you about Workseekers;

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.

#### 4.4. Photos and 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.

Our premises have 2 security cameras within the office which adhere to our workplace surveillance policy and disclosure notice. This footage is password protected.

#### 4.5. 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; and
- submit a resume by email or through 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 you to look at the OAIC's resources on Internet Communications and other Technologies.

You can contact us by landline 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 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.

### **5.1. Information Security**

Our information security system allows for all personal information to be protected using the below practices:

- Staff training;
- "Clean desk" procedures;
- Need-to-know and authorisation policies;
- Just-in-time collection policies;
- Password protection;
- Policies on laptop, mobile phone, and portable storage device security;
- Policy on timely culling; and
- Culling procedures including shredding and secure disposal etc.

### **5.2. Data Breach Notifications and Response**

In the event of a data breach, we would respond by measures appropriate to the nature and seriousness of the breach and the size and resources of our organisation taken in accordance with OAIC's data breach notification guidance and advice.

## **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;
- Government Agencies;

- to our Clients;
- to Referees for suitability and screening purposes; and
- to our contracted service providers, insurers, professional advisors, and others with a proper interest in receiving your personal information for a lawful related purpose.

#### **6.1. 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 providers;
- Legal and other professional advisors;
- Insurance brokers, loss assessors, and underwriters; and
- Superannuation fund managers.

We take all 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.

## **7. Access and 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; 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.

#### **7.1. Access Policy**

If you wish to obtain access to your personal information, you should contact us on 02 4731 2333. You will need to be in a position to verify your identity.

#### **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 impractical or unlawful to do so.

## 8. Complaints

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.

You can make complaints about our handling of your personal information to [recruit@completerecruitment.com.au](mailto:recruit@completerecruitment.com.au)

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. RCSA administers a Code of Conduct for the professional and ethical conduct of its 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 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 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; and
- 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 the 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.