

INTRODUCTION

At Spark Recruitment Pty Ltd, 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.

INFORMATION FLOW

When we collect your personal information:

- We check that it is reasonably necessary for our functions or activities as a recruitment company;
- 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 recruitment 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 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.
- We correct or attach associated statements to your personal information.
- 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.

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 company and is likely to differ depending on whether you are:

- A Jobseeker
- A Client
- 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 typically includes:

- Work history, skills and experience – typically supplied by you in the form of a resume or CV
- 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 third party or for any test that you have undertaken specifically for Spark Recruitment Pty Ltd Pty Ltd e.g. YourSpark™ personality test
- Expectations – availability, preferences and expectations relating to potential work offers, e.g. salary expectations
- Sensitive information – this may be collected in regard to 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, email address, 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

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 candidates (jobseekers) for particular jobs or particular types of work and includes:

- Referee contact details – name, position, company, telephone number, email address, postal address, etc
- Confirmation of the following, the jobseeker's:
 - Employment and position
 - Performance
 - o 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
- A Referee

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 appropriate 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;
- 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;
- Marketing services to you.

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

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 sections in this policy on Electronic Transactions and Cookies and on Photos & Images.

FOR JOBSEEKERS

Personal information will be collected from you directly when you forward a resume to us or fill out and submit one of our application forms or supply 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 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 our Privacy Policy.

FOR REFEREES

Personal information about you may be collected when you provide it to us in the course of our checking Job seeker 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 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

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. Alternatively, you can contact us by land-line telephone or post if you have concerns about making contact via the Internet.

COOKIES

You may enter a web site using cookies 'A cookie is a small piece of text stored on a user's computer by a web browser.' (Definition– Wikipedia) and the main purpose of cookies is to identify users and possibly prepare customized Web pages for them. When you enter a Web site 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.

THIRD PARTY COOKIES & TRACKING

Spark Recruitment Pty Ltd uses Google Analytics to track website traffic and website usage for our website. 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 Spark Recruitment Pty Ltd.

Google Analytics' Terms of Service' 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 Opt –out ad –on is provided, should you not want to be tracked by Google Analytics. This tool prevents Google Analytics from tracking you but does not prevent data from being sent to Spark Recruitment Pty Ltd's servers nor any other tracking services/tools that Spark Recruitment Pty Ltd may use.

HOW SPARK RECRUITMENT PTY LTD HANDLES COOKIES AND DATA ON OUR WEBSITE

Cookies are an essential part of the workings of our website. Spark Recruitment Pty Ltd Pty Ltd 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. Spark Recruitment Pty Ltd website cookies are used ONLY within our individual website. No data is automatically transferred between 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. Spark Recruitment Pty Ltd does not, for any reason, directly access the data provided from these cookies for any purpose(s) outside the reasonable functioning of the website and/or services offered within the website.

Any personal detail which you submit to us (name, address, phone and e-mail details, plus – and including- information volunteered by you) through the website are held by Spark Recruitment Pty Ltd Pty Ltd 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 Spark Recruitment Pty Ltd 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 online. We guarantee that this resume 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 is kept secure. For the purposes of the recruitment process, we may share your details/information with employers/3rd party companies/individuals. In these instances where your detail is shared

outside Spark Recruitment Pty Ltd we will seek your approval prior to making your detail available.

Spark Recruitment Pty Ltd maintains email lists. When you registered your details you agreed to opt-in 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 to notify us of this.

HOW YOUR PERSONAL INFORMATION IS HELD

Personal information is held in our Recruitment 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.

OUR RECRUITMENT SYSTEM

Spark Recruitment Pty Ltd uses a number of 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), Spark Recruitment Pty Ltd has strict 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, Spark Recruitment Pty Ltd Pty Ltd 's password policy ensures that:
 - Employees are forced to change their system passwords on a regular basis;
 - 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 Spark Recruitment Pty Ltd 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, Spark Recruitment Pty Ltd has a secure disposal unit in which to deposit the documentation for its ultimate destruction.

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; 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.

ACCESS POLICY

If you wish to obtain access to your personal information you should contact our Privacy Officer. We will require a reasonable time (usually 30 days) to respond. You will need to be in a position 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.

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 Coordinator, Luke Singleton, Director Spark Recruitment Pty Ltd.

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

CONTACT US

Luke Singleton
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T: 02 8090 7788
E: privacy@sparkrecruitment.com.au

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