

The Privacy Act 1988 (Cth) (**Privacy Act**) seeks to protect individuals against interferences with their privacy by regulating the way in which personal information is collected, handled, disclosed, used and stored.

DFP Recruitment Services Pty Ltd (referred to as 'DFP') understands the importance of, and is committed to, protecting the privacy of an individual's personal information. In handling personal information, DFP is committed to complying with the Privacy Act and the Australian Privacy Principles in the Privacy Act.

This statement sets out how DFP aims to protect the privacy of your personal information, your rights in relation to your personal information managed by DFP and the way DFP collects, holds, uses and discloses your personal information. This statement may be updated from time to time.

What is your personal information

Personal information is any information or an opinion (whether true or not) about you. It may range from the very sensitive (e.g. medical history or condition) to the everyday (e.g. address and phone number). It would include the opinions of others about your work performance (whether true or not), your work experience and qualifications, aptitude test results and other information obtained by us in connection with your possible work placements. Personal information includes sensitive information.

What is sensitive information

Sensitive information is a special category of personal information. It includes information or opinion about you:

- membership of a professional or trade association or membership of a trade union;
- criminal record;
- health or disability (at any time);
- It includes personal information collected to provide a health service.

There are other types of sensitive information; but they are generally less relevant to work and pre-work situations.

Sensitive information can, in most cases, only be collected with your consent.

We will only collect information that is necessary for the proper performance of our tasks or functions. We do not collect or use personal or sensitive information for the purposes of unlawful discrimination.

In the event that we are contracted to provide services to a Commonwealth, State or Territory government agency, it may become necessary to collect and manage personal information as an Agency under different privacy arrangements.

This policy acknowledges that the purposes for which we collect, hold, use and disclose your personal information are likely to differ depending on whether you are:

- a work seeker
- a Client
- a Referee

This policy encompasses all of the above categories.

You are under no obligation to provide your personal information to DFP. However, without certain information from you, or where information provided is inaccurate or irrelevant, DFP may not be able to provide its services to you or may be limited in its ability to provide its services to you.

DFP will only collect information that is necessary for the proper performance of our tasks or functions. We do not collect or use personal information for the purposes of unlawful discrimination. 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 do not routinely conduct criminal history checks and only do so in order to obtain relevant criminal history with regard to particular jobs you are offered or for which you are shortlisted. If you only browse our website, we do not collect information that identifies you personally, though we may collect information related to your visit to our website.

Type of personal information collected and held

Personal information that we collect and hold usually falls into the following categories:

- Candidate information submitted and obtained from the candidate and other sources in connection with applications for work including general contact information, your education, work history, qualifications, skills.
- Referee information submitted and collected including work history, titles, relationship to applicant and contact details. By providing referee names and details (email address, contact information) implies you have clear consent from them to provide that information to DFP so that we may contact them and conduct a reference check on your behalf. Referee information must not be provided to DFP if you do not have the referee's consent to do so.
- Information about your work rights and your eligibility to work within Australia which may include details, copies or presentation of the originals of any applicable visa, passport, birth or citizenship certificate, or other relevant documentation.
- Opinions of others about your work performance (whether true or not) which will be collected with your consent.
- Sensitive information (e.g. information about your health, medical history or specific condition, criminal record, professional memberships etc), which will only be collected with your consent.
- Any results of relevant tests in which you participate including but not limited to online testing carried out on DFP's behalf by other providers.
- Any personal information relevant to any training programs you undertake.
- Your tax file number and relevant bank and superannuation account information necessary to facilitate the payment of wages and superannuation contributions and to ensure appropriate taxation treatment.
- Driver's licence number and relevant information about your driving history or infringements and any other applicable licences and certificates.
- Work performance information.
- Information about incidents in the workplace.
- Information submitted and obtained in relation to absences from work due to leave, illness or other causes.
- Information obtained to assist in managing client and business relationships.

How your information is collected

Generally, personal information will be collected from you directly when you complete an application form or submit your resume, either online or in hard copy, attend an interview, or otherwise provide us with personal information in person or via telephone, email, fax, post or other means, whether at DFP's request or at your own initiative.

Personal information may also be collected from a source other than you when:

- You submit an application form or your resume through a third party website.
- We undertake reference checks by inquiring with, or we otherwise receive references or performance feedback (whether negative or positive) from, any of your former or current employers, work colleagues, professional associations or registration bodies (reference checks are only undertaken with your consent).
- We receive results of any medical tests or criminal history checks, (which are only undertaken with your consent).
- We receive results from any competency tests in which you participate.
- We receive results from any other online process or testing including but not limited to assessments, induction courses and background checks carried out by providers on DFP's behalf.
- We undertake a VEVO Check through which to assess your eligibility to work within Australia.
- We receive any complaint from or about you in the workplace.
- We receive information from your employer for the provision of employee benefits or career assessments for candidates receiving our career transition or training services.
- We receive information about a workplace accident in which you were involved; and we receive any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you were or are involved during, or in connection with, a work placement.

- 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 Australian Privacy Principles and this Policy.

Why your personal information is collected

DFP collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of providing you with recruitment, work placement services, career transition and training services. This may include using and disclosing your personal information to facilitate or otherwise in connection with:

- our assessment of your suitability for registration with us;
- the necessary validation (including from appropriate third party sources) of your resume, v.v., nominated references, or stated qualifications, experience, training or abilities. Where we require third party validation we will tell you how we propose to obtain it;
- your actual or possible work placement
- your performance appraisals our assessment of your ongoing performance and prospects
- any test or assessment (including medical) that you might be required to undergo
- our identification of your training or career transition needs
- any workplace rehabilitation in which you and we are involved;
- our management of any complaint, investigation or inquiry in which you are involved, and
- any insurance claim or proposal that requires disclosure of your personal or sensitive information
- suggestions we may make to you , whilst you remain registered with us, for further training in connection with work of the type that you are seeking through us;
- any reference that we may give concerning your work;
- our statutory compliance obligations;

DFP may also collect, hold, use or disclose your personal information for:

- Administrative and business management purposes.
- Marketing purposes and to identify and inform you of products and services that may be of interest to you.
- Its own internal recruitment processes; and/or
- Any other legal requirement.

Where personal information is used or disclosed, DFP takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed.

You are under no obligation to provide your personal information to DFP. However, without certain information from you, or where information provided is inaccurate or irrelevant, DFP may not be able to provide its services to you or may be limited in its ability to provide its services to you.

Disclosures

DFP discloses information for the purposes for which DFP collects it. Therefore related to the provision of recruitment services or work placement services or as otherwise set out in this policy statement.

Circumstances where we may disclose your information include:

- Clients and potential clients of DFP in relation to recruitment practises.
- Your referees or a person who seeks a reference about you;
- Other members of the DFP Group
- Educational institutions and organisations, for the purpose of recommending and facilitating courses or programs through which you can upgrade your skills and undertake further training.
- DFP's insurers.
- A professional association or registration body if relevant to the provision of DFP's services or otherwise with your consent.
- A workers compensation body in accordance with applicable legislation.
- DFP's contractors and suppliers including IT contractors and database designers.
- A federally registered Job Services Provider, for the purpose of confirming hours of work and hourly rate of pay.

- DFP's professional advisors.
- Any other entity, with your consent, or to whom disclosure is required or authorised by law; and/or
- Any other third parties engaged to perform administrative or other services.

Trans-Border Data Flows

We cannot guarantee that any overseas recipient of your personal information will protect it to the standard to which it would be protected in Australia. 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 into a jurisdiction in place of seeking an assurance of protection from the overseas jurisdiction.

Direct Marketing

DFP may use and disclose your personal information in order to inform you of products and services that may be of interest to you. In the event you do not wish to receive such communications, you can opt-out by contacting DFP via the contact details set out below or through any opt-out mechanism contained in a marketing communication to you.

Security of your Personal Information

DFP takes all reasonable steps to ensure personal information it holds is protected against misuse, interference and loss and from unauthorised access, modification or disclosure. DFP holds personal information in both hard copy and electronic forms in secure databases on secure premises. Some of your personal information may be held on portable devices such as mobile phones, laptop computers or in diaries operated and held by our staff members. Some of your personal information will also be held on such devices by clients of DFP for recruitment or placement purposes.

DFP will destroy or de-identify personal information in circumstances where it is no longer required, unless DFP is otherwise required or authorised by law to retain the information.

Employee Records Exemption

A private sector employer's handling of employee records in relation to current and former employment relationships is exempt from the Australian Privacy Principles.

An employee record is defined under section 6(1) of the Privacy Act 1988 (Cth) to mean a record of personal information relating to the employment of the employee. Examples include health information about an employee, as well as personal information relating to:

- The engagement, training, disciplining, resignation or termination of employment of an employee
- The terms and conditions of employment of an employee
- The employee's personal and emergency contact details, performance or conduct, hours of employment or salary or wages
- The employee's membership of a professional or trade association or trade union membership
- The employee's recreation, long service, sick, maternity, paternity or other leave
- The employee's taxation, banking or superannuation affairs.

In the event personal information is collected during an application, recruitment or other assessment process and you subsequently become an employee of DFP, DFP's handling of such personal information may no longer be governed by the Privacy Act and this statement will no longer apply to you. DFP will nevertheless treat personal information it holds about its employees appropriately in the circumstances.

You can gain access to, and seek correction of, your Personal Information held by DFP

DFP takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that is collected and held by DFP. If at any time you would like to access or correct the personal information that DFP holds about you, or you would like more information on DFP's approach to privacy, please contact DFP via the contact details set out below. DFP will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- You will have to provide proof of identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected.
- DFP requests that you be reasonably specific about the information you require; and
- DFP may charge you a reasonable administration fee, which reflects the cost to DFP for providing access in accordance with your request.

DFP will endeavour to respond to your request to access or correct your personal information within 30 days from your request. If DFP refuses your request to access or correct your personal information, DFP will provide you with written reasons for the refusal and details of complaint mechanisms. DFP will also take steps reasonable in the circumstance to provide you with access in a manner that meets your needs and the needs of DFP.

Inquiries and Complaints

If you have concerns regarding a breach of your privacy or would like further information about our Privacy Policy you may email our Privacy Coordinator at privacy@dfp.com.au.

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



Kate Coath
Chief Executive Officer
DFP Recruitment Services
March 2022