

## We respect your privacy

At DFP, our mission is to recruit and retain passionate and engaged people to provide solutions and create value for our clients and candidates.

Protecting all the information we collect and using it only in ways you would expect will help us meet this mission and maximise the value in every client and customer contact.

Our approach to privacy is based on the following:

- We only collect and use information that we need to provide exceptional recruitment services. Without collecting the necessary personal information, we could not do this.
- We only share your personal information where it is reasonably necessary for the purposes of providing you with our recruitment, work placement services, career transition and training services. Most of these recipients are located in Australia and we always ensure they take the same level of care with your personal information that we do.

## Who we are

This Information Collection and Privacy Policy ("**Policy**") applies to DFP Recruitment Services Pty Ltd, ABN 66 394 749 447 ("**DFP**"). This Policy 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 we collect, hold, use and disclose your personal information.

In handling personal information, DFP acts as an Agency, in compliance with Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles in the Privacy Act. 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.

## What is 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 also includes "sensitive information".

## What is sensitive information?

Sensitive information is a special category of personal information, requiring additional protection. It may include information or an opinion about your:

- membership of a professional or trade association or membership of a trade union;
- criminal record;
- race or ethnicity;
- health or disability (including vaccination information and accessibility needs) and personal information collected from you in order to provide you with a health service.

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

## Vaccination Information

We may collect information about your vaccination status (eg COVID-19) and proof of vaccination as necessary to:

- ensure our own compliance with public health directions and to facilitate our prevention and management of the risk of transmission and;
- to support compliance with client requirements when placing candidates in a role.

We will only collect, use and disclose the minimum amount of vaccination status information necessary to achieve the purposes above.

We will always handle your vaccination information in accordance with this Policy, and we will take reasonable steps to keep this information secure and will safely destroy it once it is no longer reasonably necessary for the purpose for which we collected it.

## How we collect your personal information

### Collecting information from you

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 or a potential client; or
- a referee.

This Policy encompasses all of the above categories.

We typically collect your personal information 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, video, post or other means, whether at DFP's request or at your own initiative. We also collect your information when you:

- visit our website;
- register as a job seeker on our website;
- engage with us by online enquiry, chatbot or via social media;
- download one of our website or online resources
- participate in a discussion on our website or online platforms; or
- contact us for example, via phone or email, to request our services.

### Collecting information from other sources

We may also collect information about you from third party sources, such as public databases, social media platforms, third-party data providers, and our joint marketing partners. 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.

We use this information, alone or in combination with other personal information we collect, to enhance our ability to provide relevant marketing and content to you and to develop and provide you with more relevant services.

## What personal information we collect

The personal information we collect about you depends on how you interact with us. 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 us, so that we may contact them and conduct a reference check on your behalf. Referee information must not be provided to us 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 conditions, 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 and to allow us to provide our services.

## Online visitors

When you visit our website we may collect certain information about you and the device(s) you use through the use of cookies and other tracking technologies. 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, such as:

- device information (such as IP addresses);
- location (such as city and state);
- online behavioural data (such as information about your use of social media websites, page view information and search results and links).

## Anonymity and pseudonymity

You can remain anonymous or use an alias when making a general enquiry about our services through email, or our online chat function. However, we may need you to provide personal information to facilitate enquiries about your requirements as part of us providing service to our clients, candidates and website visitors.

## How we use your personal information

Your personal information is only used 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 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, nominated references, stated qualifications, experience, training or abilities (where we require third party validation of this information 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 use 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 administrative, application and business management purposes;
- our marketing, including feedback and review processes to identify and inform you of services that may be of interest to you;
- our own internal recruitment processes which include the use of applicant management systems and generative AI platforms; and
- our legal obligations.

We take all necessary and reasonable steps in the circumstances to ensure that our use of your personal information is relevant to the purpose for which it was collected.

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

We will not use personal information for any purpose not covered in this Policy, without your consent.

## Marketing

We may use and disclose your personal information in order to inform you of 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 us via the contact details set out below, or through the opt-out mechanism contained in the marketing communication.

## Who we share your information with and why

We will only disclose your information for the purposes for which we collected it, or if related to the provision of recruitment services or work placement services or as otherwise set out in this Policy. We may disclose personal information we hold to:

- our clients and potential clients, 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;
- our insurers and other professional advisors;
- professional associations or registration bodies if relevant to the provision of our services; or otherwise with your consent;
- a workers compensation body in accordance with applicable legislation;

- our 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;
- any other entity, with your consent, or to whom disclosure is required or authorised by law; and
- any other third parties engaged to perform administrative, recruitment, work placement or other services relevant to our business purposes.

## Trans-Border Disclosures

We typically only disclose personal information to recipients located in Australia. 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.

If we are required to transfer your personal information to third parties or service providers overseas, we will take all reasonable and necessary steps to ensure their handling of your personal information is in compliance with applicable data protection law, through robust contractual arrangements. However, the costs and difficulties of enforcing 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.

We will not disclose or share your personal information other than as described in this Policy or with your consent.

## What steps we take to keep your information safe

We take all reasonable and necessary steps to ensure personal information we hold is protected against misuse, interference and loss and from unauthorised access, modification or disclosure.

We hold 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 our clients, where necessary for recruitment or placement purposes.

Access to personal information we hold is restricted to a need to know basis. Only employees who need the information to perform their role are granted access to your personal information and we ensure all our employees are trained and kept up-to-date on our security and privacy practices.

We also have robust confidentiality agreements in place with all of our employees, clients and service providers. We will take all necessary and reasonable steps to destroy or de-identify personal information in circumstances where it is no longer required unless we are otherwise required or authorised by law to retain the information.

If you have any questions about our security practices, please contact us using the details below.

## 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.

## How can you access or correct your information

You have the right to access personal information we hold about you and to ask that your personal information be corrected or updated. You can make a request to access or correct your personal information at any time, by contacting our Privacy Coordinator using the email address below.

When you submit a request to access or correct your information, we request that you be reasonably specific about the information you require, to allow us to respond to your request promptly. We will also need to verify your identity, to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected.

We may charge you a reasonable administration fee, which reflects the cost we incur in providing access in accordance with your request.

We will endeavour to respond to your request to access or correct your personal information within 30 days of your request. We will also take all reasonable and necessary steps to provide you with access in a manner that meets your needs and the needs of our business.

If we refuse your request to access or correct your personal information, we will provide you with written reasons for the refusal and details of complaint mechanisms.

## Opt-out of marketing

You may opt-out of receiving marketing information from us at any time by:

- using the "opt-out" or "unsubscribe" mechanism included in any marketing communication you receive from us; or
- contacting us at [privacy@dfp.com.au](mailto:privacy@dfp.com.au) and requesting that you no longer receive marketing materials from us.

## How to contact us if you have any concerns

If you have any questions or concerns about the way that we collect, hold, use or disclose your personal information, you can contact our Privacy Officer at any time, at [privacy@dfp.com.au](mailto:privacy@dfp.com.au). If you are unhappy with our response to you, or if you wish to make a complaint about our handling of your personal information, you may lodge a complaint with the Office of the Australian Information

Commissioner.

## **Changes to this policy**

If we decide to change this Policy, we will post those changes on our website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

If you have questions or concerns regarding this Policy, please contact our Privacy Officer using the contact details above.



**Kate Coath**  
**Chief Executive Officer**  
**DFP Recruitment**  
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