

# Privacy Policy

## Introduction

We manage personal information in accordance with the *Privacy Act 1988* and the *Australian Privacy Principles*. This policy applies to information collected by Spinifex Recruiting Pty Ltd and related companies (or collectively "Spinifex Recruiting", "we", "us", "our"). The related companies include Small & Associates Pty Ltd, GWS Personnel Pty Ltd, JHA Recruitment & Staff @ work 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.

If you have any questions, please contact us.

## This policy will explain:

- Why we collect your information.
- What types of information we collect?
- Purposes for which we collect and hold personal information
- What happens if you choose not to provide us with the required information.
- How your information is collected?
- Security & Protection of your personal information
- Parties to whom your information may be disclosed to by us.
- How you can access or correct information we hold about you.
- How you can complain about our handling of your personal information

### Why do we need a privacy policy?

The *Privacy Act 1988* and its subsequent amendments require us to have policies and procedures in place to cover the collection, use and disclosure of personal information we may hold about you.

### Type of personal information collected and held

Personal information that we collect and hold that is reasonably necessary for the proper performance of our functions as a recruitment agency usually falls into the following categories:

- Candidate information submitted by, and obtained from, the candidate and other sources in connection with applications for work.
- Candidate information submitted by candidate to facilitate payment of services ie. bank account details, tax file number.
- Referee contact details as supplied by candidates seeking employment.
- Work performance information supplied by referees and/or clients when placed on labour-hire assignment or in permanent roles.
- Information about incidents in the workplace supplied by referees and/or clients when placed on labour-hire assignment.
- Information submitted and obtained in relation to absences from work due to leave, illness or other causes.

- Client contact information obtained to assist in managing client and business relationships.

### **Purposes for which we collect and hold personal information**

Spinifex Group holds information relating to its employees, temporary staff, contractors and other workplace participants. The information collected, which may vary depending on whether you are a candidate (work seeker), client or employer referee, is primarily used for the following:

- To identify you
- Temporary employment services
- Permanent recruitment services
- Staff management and performance appraisal
- Training
- Client and business relationship management
- Marketing
- Statutory requirements

### **For candidates if you do not give us the information we seek**

- We may be limited in our ability to locate suitable employment for you.
- We may be limited in our ability to employ you.

### **Using a pseudonym or engaging with us anonymously**

If practicable you have the option of engaging with us anonymously or using a pseudonym, however due to the nature of our services, in most cases anonymity will not be possible.

### **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 candidate, client or referee.

For candidates your 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.

For clients personal information may be collected when you provide it to us for business or business related social purposes.

For Referees personal information about you may be collected in the course of checking our candidates references and work history with you.

Information may be collected in person, via mail, or electronically. With electronic transactions 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.

### **Security & Protection of your personal information**

Spinifex Recruiting takes all reasonable steps to ensure the personal information it holds is protected against misuse, interference and loss and from unauthorised access, modification or disclosure. Personal information is held in both hard copy and electronic forms in secure databases on secure premises, accessible only by staff trained to respect confidentiality and privacy of individuals.

Safeguarding candidate information is important to us. At Spinifex Recruiting we take breaches of privacy very seriously and if any personal information has been lost or subjected to unauthorised access, use or modification, we will take all necessary steps to immediately contain and rectify the breach and prevent future occurrences of a similar breach. If the breach is deemed likely to result in serious harm to our candidates, Spinifex Recruiting will take all reasonable steps to notify you and provide you with the relevant information in relation to the breach.

Although we will take all reasonable steps to keep information secure, no internet server or data transmission over the internet can be guaranteed to be 100% secure. We cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Therefore, any information which you transmit to us online is transmitted at your own risk.

### **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 contractors from time to time. Our contractors may see some of your personal information. Typically our contractors 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

### **Cross-Border Disclosures**

Spinifex Group does not directly disclose personal information to overseas recipients. However, we cannot guarantee that any recipient of your personal information will protect it to the standard to which it ought to be protected.

### **Compulsory release of information**

There may be circumstances where Spinifex Group is contacted in relation to the compulsory release of information. For example, as a result of supplying the Australian Taxation Office with an employee's tax declaration, a statutory body such as Centrelink or the Child Support Agency may require us to release relevant information to their authority. In such cases Spinifex Group are obliged to comply with the request, without necessarily seeking the employee's permission.

## Access and Correction

Subject to some exceptions that are set out in Australian Privacy law, you can gain access to the personal information that we hold about you. We may refuse access that would interfere with the privacy rights of other persons or that breaches any confidentiality attached to that information.

If you wish to obtain access to your personal information you should contact our Privacy Officer. You will be required to verify your identity.

You should also anticipate that it may take a little time to process your application for access as there may be a need to retrieve information from storage and review information in order to determine what information may be provided.

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.

## 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 Officer, whose contact details are;

- The Privacy Officer
- Spinifex Recruiting
- Level 8
- 33 York Street
- Sydney NSW 2000
- Email: [privacy@spinifexaustralia.com.au](mailto:privacy@spinifexaustralia.com.au)

You can also make complaints to the Office of the Australian Information Commissioner  
<http://www.oaic.gov.au/>

Complaints may also be made to RCSA, the industry association of which we are a member.  
<http://www.rcsa.com.au>

## Links to other web sites

Spinifex Recruiting and related company websites contain links to other third party web sites. We are not responsible for the privacy policies or the content of any such web sites.

## Contact Us

If you have any questions about this Privacy Policy, the practices of our web sites, or your dealings with our web sites, you can contact us on 1300 800 301 or [privacy@spinifexaustralia.com.au](mailto:privacy@spinifexaustralia.com.au).