

## CONEXSON Privacy Policy

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### 1. Introduction

We manage personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles*. This policy applies to information collected by CONEXSON 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

CONEXSON 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](#) as a Recruitment Agency;
- 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](#). 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 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 Agency and is likely to differ depending on whether you are:

- a [Workseeker](#);
- a [Client](#); or
- a [Referee](#).

### 2.1. For Workseekers

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:

- Previous employment details;
- Personal contact details including address, phone and email contacts;
- Pay details including but not limited to banking information, tax file number and superannuation details;
- Details and Copies of qualifications, tickets and licenses;
- Evidence of Right to Work in Australia (for non-Australian and NZ Citizens);
- Personal medical information and details relating to fitness for work;
- References from work referees;

### 2.2. 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:

- Company details including but not limited to ABN, contact information, company trading details and address details
- Company representative's contact details
- Company outlines and site descriptions
- Credit check results including reference check contact details and information

- Assessment reports on Health and Safety Risk and Hazard Assessments

### 2.3. 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 Workseekers for particular jobs or particular types of work and includes:

- Names and contact numbers;
- Details disclosed by the referee about the Workseeker or the company in the case of credit checks

## 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](#).

The following sections are also relevant to our use and disclosure of your personal information:

- [Our Policy on Direct Marketing](#)
- [Overseas Disclosures](#)

### 3.1. For Workseekers

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

- Establish your identity and assess your requests for employment or services;
- Assess whether you have the right to work in Australia, if you wish to work for us;
- Assess whether you are suitable for any employment opportunities with CONEXSON, based on qualifications, experience, physical and mental health, among other things;
- Contact you in relation to any employment or potential employment opportunities with any of our clients;
- Comply with any applicable legal obligations and assist government and law enforcement agencies or regulators;
- Provide quotes, estimates and tenders for our services;
- Administer our services and our role as an employer, including in relation to workers compensation claims;
- Manage our relationship with you;
- Manage our risks and identify and investigate any illegal activity;
- Conduct and improve our businesses; and
- Identify and tell you about other products or services that we think may be of interest to you.

### 3.2. 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;

### 3.3. For Referees

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

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

### 3.4. Our Policy on Direct Marketing

Client information is also used for the direct marketing of suitable and available Workseekers. Clients have the option to opt out of such direct marketing by reply email.

From time to time Workseekers information may also be used to be bulk emailed information regarding activities related to CONEXSON and also suitable positions that maybe available. Workseekers can choose to opt out of such communication by reply email.

Client and Workseeker information will never be given to a third party for the purposes of direct marketing.

At all times CONEXSON will abide by the requirements of anti-spam legislation.

#### **4. 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 [Workseeker](#);
- a [Client](#); or
- 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 section in this policy on [Electronic Transactions](#).

See also the section on [Photos & Images](#).

##### **4.1. For 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.

Personal information is also collected when:

- We conduct an interview with you;
- We conduct work references;
- We conduct Visa Entitlement Verification Online (VEVO) checks (for non-Australian & NZ Citizens);
- You are offered an assignment with CONEXSON;
- We conduct post placement references checks.

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. 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 the [APPs](#) and our Privacy Policy.

##### **4.3. For Referees**

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

- in the course of our 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 & Images**

For the purpose identification we will take a photo of all Workseekers upon your arrival for an interview. This photo is stored securely in our [Information Record System](#) and is used for the sole purpose of identifying Workseekers.

As part of our responsibility to our Clients, Workseekers and Work Health and Safety Requirements it's imperative we can prove our Workseekers have valid and current qualifications, tickets and licenses and as such will take a copy of these documents and store them securely in our [Information Record System](#).

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.

#### **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 or our pay system;
- 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. It might help you to look at the OAIC's resource on [Internet Communications and other Technologies](#).

You can contact us by landline telephone or post if you have concerns about making contact via the Internet.

If you use our website, apps, online services and other mobile applications, information about your location and activities may also be collected. Such information includes IP addresses, telephone numbers and whether you accessed third party sites. It also includes information on the volume of site visits, date and time of visits, the origin of visits, pages viewed and the length of time spent on our site.

Some of this information is collected through the use of cookies. We will use a combination of the various types of cookies. Our use of cookies will depend on what part of our websites and online services you use and what functions you request of those sites and services. For example, in order to measure the effectiveness of marketing campaigns (for example, banner advertising), there may be occasions where we allow third parties to collect analytical data from our site using their cookies.

Further, we may provide website visitor usage information to third party advertising servers in order to target our online banner advertising on other sites. Again we do not allow the capture or transmission of any site usage information that can personally identify you. Please note that these cookies do not capture information that leads to your personal identity being revealed.

By checking your browser settings, you can control how cookies are used on your computer or device. Please note that some of the cookies we use may be essential to ensuring privacy and protection of data and functionality. If you delete or block certain cookies, your experience on our websites and services may be affected. You may discover that functionality is limited or some parts of the website do not work at all.

## **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. Our Information Record System

Our Information Record System is a cloud based information system that is securely protected by a third party provider and hosted in Australia in accordance with the Australian Privacy Principles.

All hard copies of your personal information are scanned into the Information Record System and are then destroyed immediately.

## 5.2. Information Security

CONEXSON takes reasonable steps to ensure the security of your personal information. Our Information Record System, Email system, Pay system and all other systems are cloud-based systems that are securely hosted in Australia by third party providers. Their IT systems are password protected and they conduct regular audit and data integrity checks. They frequently update their anti-virus software in order to protect their systems (and the data contained in those systems) from computer viruses. In addition, all of their employees are required, as a condition of employment, to treat personal information held by them as confidential.

Only CONEXSON staff that have been trained in our Privacy Policy are allowed access to any of our systems. They all have a unique log in and password and any changes that are made by them are tracked accordingly.

All CONEXSON mobile phones, laptops and portable storage devices that have access to our systems are password protected to ensure no unauthorised access to your information.

Whilst we endeavour to provide a secure online environment, there are inherent risks associated with the transmission of information via the Internet and no data transmission over the Internet can be guaranteed to be completely secure. We therefore cannot warrant the security of any information you provide to us over the Internet and you do so at your own risk.

We encourage you to play an important role in keeping your personal information secure, by maintaining the confidentiality of any passwords and account details used on our website or for our services. It is your sole responsibility to maintain such confidentiality and we will not be liable for any damage, loss or expense suffered due to intentional or inadvertent disclosure of such information.

## 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;
- To our Clients;
- To Referees for suitability and screening purposes;
- To our service providers, including those to whom we outsource certain functions such as direct marketing, document production, debt recovery and information technology support;
- To advisers and persons acting on your behalf, such as your doctor or solicitor;
- To employers, former employers and potential employers.

### 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 suppliers;
- Legal and other professional advisors;
- Insurance brokers, loss assessors and underwriters;
- Our financiers, investors, advisers and persons who may acquire rights to our assets;
- Claims-related providers, such as assessors and investigators, who help us with claims;
- Our auditors and insurers;

- Government and law enforcement agencies or regulators; and
- Superannuation fund managers;
- Background checking and screening agents;

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.

## 6.2. Cross-Border Disclosures

Some of your personal information is likely to be disclosed to overseas recipients via overseas service providers or other third parties who operate or hold data outside Australia. Where we send your information overseas, we will make sure where possible appropriate security arrangements and data handling systems are in place; however, 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.

## 7. 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.

For more information about access to your information see our [Access Policy](#).

For more information about applying to correct your information see our [Correction Policy](#).

### 7.1. Access Policy

If you wish to obtain access to your personal information you should contact our Privacy Co-ordinator. You will need to be in a position to verify your identity. CONEXSON will not charge you for accessing your data. All requests to accessing your personal information (subject to confidentiality) will be responded to within 48 hours of receiving the request in writing and we endeavour to have your information available with in 14 days.

In some circumstances, we may deny your request to access your information, or otherwise limit the access we provide. We will only do this where we are legally permitted to so. In such case, we will explain our decision to you.

### 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 impracticable or unlawful to do so.

If we disagree with you about whether your information should be corrected, we will let you know our reasons. If this occurs, you can ask us to include a statement with the relevant information, indicating your view that the information is for example, inaccurate, misleading, incomplete, irrelevant or out-of- date, whatever might be the case. We will take reasonable steps to comply with such a request.

## 8. Privacy Complaints

You have a right to complain about our handling of your personal information if you believe that we have interfered with your privacy.

For more information see our [Privacy Complaints Procedure](#).

### 8.1. Privacy 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 our Privacy Co-ordinator, whose contact details are Tamara Bloxham, Systems and Compliance Manager, Ph: 07 3852 4252.

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. 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 established 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](#).