

# Privacy Policy

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## About this policy

The Privacy Act 1988 requires entities bound by the Australian Privacy Principles to have a privacy policy. This privacy policy outlines the personal information handling practices of Arnold Group Australia Pty Ltd and its Divisions (Arnold Group Australia).

This policy is written in simple language. The specific legal obligations of Arnold Group Australia when collecting and handling your personal information are outlined in the Privacy Act 1988 and in particular in the Australian Privacy Principles found in that Act. We will update this privacy policy when our information handling practices change. Updates will be publicised on our website and Policy and Procedure Manual.

## 1 Overview

We collect, hold, use and disclose personal information to carry our functions or activities as an employment firm.

These functions and activities may include:

- work placement operations
- recruitment functions
- client and business relationship management
- marketing or communicating services to you
- to confirm identity and authority to provide references
- statistical purposes and statutory compliance requirements

## 2 Collection of your personal information

At all times we try to only collect the information we need for the particular function or activity we are carrying out. The main way we collect personal information about you is **when you give it to us**, for example, we collect personal information such as contact details, current employment details, education history, work history and referee details when you:

- contact us to ask for information (but only if we need it)
- submit your information to us electronically or in person

We may also collect contact details and some other personal information if you are participating in a meeting or consultation with us.

### 2.1 Collecting sensitive information

Sometimes we may need to collect sensitive information about you. This might include information about your health, association memberships, criminal history information.

### 2.2 Indirect collection

We may 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 when you have consented or would reasonable expect us to collect your personal information in this way. For further information refer to Social Networking Services in this policy.

### 2.3 Collecting through our websites

Where our websites allow you to make comments or give feedback we collect your email address and sometimes other contact details. We may use your email address to respond to your feedback. We may store this personal information on servers located in Australia.

#### 2.3.1 Analytic, session and cookie tools

We use a range of tools provided by third parties, including Google to collect or view website traffic information. These sites have their own privacy policies. We use the information to maintain, secure and



improve our websites and to enhance your experience when using them. In relation to Google Analytics you can opt out of the collection of this information using the Google Analytics Opt-out Browser Add-on.

## 2.4 Social Networking Services

We use social networking services such as LinkedIn, Twitter, Facebook and YouTube to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These sites have their own privacy policies.

## 2.5 Email lists

We may collect your email and, if you provide it, other contact details when you subscribe to our email lists. We only use this information for the purpose of communicating with you, and to administer the lists.

# 3 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 destroy 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.

## 3.1 Storage and security of personal information

We take steps to protect the security of the personal information we hold from both internal and external threats by:

- regularly assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure that information
- we destroy personal information in a secure manner when we no longer need it.

# 4 Disclosure

We may disclose your personal information for any of the purposes for which it is 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.

## 4.1 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;
- 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.

## 4.2 Disclosure of personal information overseas

Generally we only disclose personal information for the purposes for which you gave it to us or for directly related purposes you would reasonably expect or if you agree.

Web traffic information is disclosed to Google Analytics when you visit our websites.

Google stores information across multiple countries. For further information see [Google Data Centres](#) and [Google Locations](#).

When you communicate with us through a social network services, the social network provider and its partners may collect and hold your personal information overseas. These sites have their own privacy policies.

## 5 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.

### 5.1 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.

### 5.2 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.

## 6 Complaints

If you wish to complain to us about how we have handled your personal information you should complain in writing. If we receive a complaint from you about how we have handled your personal information we will determine what (if any) action we should take to resolve the complaint.

If we decide that a complaint should be investigated further, the complaint will usually be handled by the Director than the manager whose actions you are complaining about.

We will tell you promptly that we have received your complaint and then respond to the complaint within 30 days.

### 6.1 How to contact us

You can contact us by:



Email: [enquiries@arnoldgroup.com.au](mailto:enquiries@arnoldgroup.com.au)

Telephone: (03) 9642 2227 (from overseas +61 3 9642 2227)

Post: 1/517 Flinders Lane

Melbourne VIC 3000