

PRIVACY POLICY AND COLLECTION STATEMENT

1. CONFIDENTIALITY

Hughes-Castell Pty Ltd comprises the brands Hughes-Castell, Legal Eagles Recruitment and JD Recruitment. Reference made herein to Hughes-Castell, also refers to the abovementioned divisions of the company.

This Privacy Policy and Collection Statement explains how we collect personal information and how we maintain, use and disclose that information. It also provides some detail about your privacy rights along with our general rights and obligations in relation to the personal information we keep on record.

2. PRIVACY POLICY

2.1 National Privacy Principles

The National Privacy Principles established by the *Privacy Act 1988* apply to Hughes-Castell.

2.2 Type of Personal Information 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;
- Work performance information;
- Information about incidents in the workplace;
- Staff information;
- 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;

2.3 Purposes for which We Hold Personal Information

We primarily hold personal information for the following :

- Placement operations;
- Recruitment;
- Staff management;
- Training;
- Client and business relationship management;
- Marketing

2.4 Disclosures

We may disclose your personal information for the purposes for which it is primarily held or for a related secondary purpose.

In some cases we may only disclose information with your consent.

We may disclose your personal information where we are under a legal duty to do so, including circumstances where we are under a lawful duty of care to disclose information.

2.5 Contractors

We contract out a number of services from time to time. Our contractors may see some of your personal information. Typically our contractors would include:

- I.T. contractors and database designers; and/or
- Auditors, Accountants and our Legal representatives.

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2.6 Inquiries and Complaints

You can make further inquiries or complaints about our privacy policies to our Privacy Co-Ordinator whose contact details are:

Privacy Co-Ordinator
Level 18
66 Eagle Street
Brisbane QLD 4000

Telephone: 61 7 3100 7000

You can also make complaints to the Office of the Federal Privacy Commissioner.

2.7 Access

Subject to some exceptions that are set out in the National Privacy Principles, you can gain access to the personal information that we hold about you.

We do refuse access if it would interfere with the privacy rights of other persons or if it breach any confidentiality that attaches to that information.

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.

We might impose a moderate charge in providing access. Our Privacy Co-Ordinator would discuss these with you.

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.

3. COLLECTION STATEMENT

We do not collect personal or sensitive information unless it is necessary for the performance of our tasks or functions.

3.1 What your personal information is

Personal information is any information or an opinion (whether true or not) about you. 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 as defined in privacy legislation. It could include, for example, relevant information about your health status or information obtained lawfully via a criminal history check.

Under privacy laws we only collect personal information if it is necessary for the performance of one or more of our tasks or functions and, subject to the exceptions set out in privacy law, we would not collect sensitive information without your consent.

3.2 Who will be collecting your personal and sensitive information

Your personal and sensitive information will be collected by Hughes-Castell for its own use and on behalf of other members of the Vedior-Select Group who might require access to your personal and sensitive information in connection with your work placements.

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3.3 How to contact us

If you wish to contact us about your personal or sensitive information you should contact:

Privacy Co-Ordinator
Level 18, 66 Eagle Street
Brisbane QLD 4000

Telephone: 61 7 3100 7000
Email: brisbane@hughescastell.com

during normal office hours which are 8.30am to 5.30pm.

3.4 How your information will be collected

Personal and sensitive information will be collected from you directly when you fill out and submit one of our registration forms or any other information in connection with your application to us for registration.

Personal and sensitive information will also be collected when:

- we receive any reference about you;
- we receive results of inquiries that we might make of your former employers, work colleagues, professional associations or registration body;
- we receive the results of any competency or medical test;
- we receive performance feedback (whether positive or negative);
- we receive any complaint from or about you in the workplace;
- we receive any information about a workplace accident in which you are involved;
- we receive any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved;
- you provide us with any additional information about you.

3.5 Your information will be used

Your personal and sensitive information may be used in connection with:

- your actual or possible work placement;
- your performance appraisals;
- our assessment of your ongoing performance and prospects;
- any test or assessment (including medical tests and assessments) that you might be required to undergo;
- our identification of your training needs;
- any workplace rehabilitation;
- our management of any complaint, investigation or inquiry in which you are involved;
- any insurance claim or proposal that requires disclosure of your personal or sensitive information.

3.6 Your personal and sensitive information may be disclosed to:

- potential and actual employers and clients of Hughes-Castell
- referees;
- other members of the Vedior-Select group;
- our insurers;
- a professional association or registration body that has a proper interest in the disclosure of your personal and sensitive information;
- a Workers Compensation body;
- our contractors and suppliers - e.g. our I.T. contractors and database designers
- any person with a lawful entitlement to obtain the information.

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3.7 If you do not give us the information we seek

If you do not give us the information we seek:

- we may be limited in our ability to locate suitable work for you;
- we may be limited in our ability to place you in work;

3.8 You can gain access to your information to correct it if it is wrong

Subject to some exceptions which are set out in the *National Privacy Principles* (Principle 6 - Access and Correction), you have a right to see and have a copy of personal and sensitive information about you that we hold.

If you are able to establish that personal or sensitive information that we hold about you is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date.

If we are unable to agree that personal or sensitive information that we hold about you is accurate, complete and up-to-date, you may ask us to place with the information a statement by you that claims that particular information is not accurate, complete and up-to-date.

If you wish to exercise your rights of access and correction you should contact our Privacy Co-Ordinator, whose details are shown above.

In some cases we may impose a moderate charge for providing access to personal or sensitive information. We will not charge you simply because you lodge a request for access.

3.9 Important Information for Queensland Work Seekers

Under the Private Employment Agents (Code of Conduct) Regulations, Section 21 (2) we are required to collect information from each person looking for work through a particular employment agency:

- (a) the person's name, address, age, gender and occupation
- (b) the type of work the person is looking for; and
- (c) the date the particulars mentioned in (a) and (b) are entered in the register.

It is important that you provide this information, because in Queensland, but for the Private Employment Agents Code, it would be unlawful under the Anti-Discrimination Act 1991, and may be deemed unnecessary under the National Privacy Principles.