

Salexo Consulting Privacy Policy

1. Introduction

- 1.1. Salexo Consulting Pty Limited (ACN 163 747 779) (**we, us or our**) is a recruitment and job placement service provider.
- 1.2. We are committed to ensuring your Personal Information is protected. We manage your Personal Information in accordance with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (**Privacy Act**).
- 1.3. By accessing and using and continuing to access and use our website (www.salexo.com.au), recruitment and job placement services you agree to this Privacy Policy.
- 1.4. This Privacy Policy outlines how we collect, store, use and disclose your Personal Information, and how you may access your Personal Information and Sensitive Information (as defined in the Privacy Act) kept by us or how you may make a privacy complaint.

2. The information we collect about you

- 2.1. We will only collect and hold Personal Information about you that is reasonably necessary to undertake our business activities and functions, make our website available to you, deliver our recruitment and job placement services to you, or as otherwise permitted by law.
- 2.2. The type of Personal Information that we collect and use depends on the type of dealings that you have with us.
- 2.3. For candidates, we typically collect and use your Personal Information to assess your suitability and availability for a job placement and to manage the recruitment and job placement process, and we collect the following types of Personal Information:
 - (a) candidate details (for example, full name, address, date of birth, mobile and telephone numbers and email address and immigration/visa status, including a copy of the candidate's passport);
 - (b) professional and work information for recruitment purposes (for example, your resume, qualifications, work history and experience, skills and talents, driver's licence details, salary/benefit information and your hobbies and interests);
 - (c) results of inquiries that we might make of your referees, former employers, work colleagues and professional bodies (for example, information and opinions relating to your work performance);
 - (d) results of any aptitude tests or background checks, including credit and criminal record checks and visa entitlement verification checks;
 - (e) information relating to complaints, accidents or incidents in the workplace;



- (f) information relating to your dealings, or enquiries you have made, with us, including information about our recruitment and job placement services;
 - (g) information regarding your access and use of our website, including location information, your computer's internet protocol (IP) address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on your website, dates and times of visits to your website and other usage statistics; and
 - (h) other information that you provide to us or that we may collect in the course of our relationship with you.
- 2.4. For employers, we typically collect and use Personal Information that is necessary to help us manage, provide and deliver our recruitment and job placement services to you and includes:
- (a) business details (for example, business name, business address, work mobile and office telephone numbers and work email address);
 - (b) information relating to the recruitment services required (including job/position description, any special qualifications, skills or attributes that may be required, work site locations, proposed commencement date and details of the salary package;
 - (c) feedback that you may have provided in relation to our candidates, or our recruitment and job placement services; and
 - (d) other information that you provide to us or that we may collect in the course of our relationship with you.
- 2.5. We may collect information about a candidate which is Sensitive Information (as defined in the Privacy Act), such as information or opinions about a candidate's health and disability, criminal records, membership of professional or trade associations, workplace rehabilitation records, insurance claim details or other such private information. In the succeeding paragraphs of this Privacy Policy, a reference to Personal Information shall include Sensitive Information.

3. How we collect Personal Information

- 3.1. We will collect Personal Information about you in a number of different ways. We may collect Personal Information directly from you or in the course of our dealings with you. For example, when you:
- (a) contact and correspond with us (for example, when you complete hardcopy or online forms for our recruitment and job placement services or subscribe to our publications, alerts and newsletters, or information you provide to us when you send us an email);
 - (b) when use or order our recruitment and job placement services;
 - (c) visit our website (including via cookies), contact us online, by email or via telephone with a query or request or make a comment on our social media sites;



- (d) provide your Personal Information to us or to prospective employers who we have introduced you to (for example, when you disclose your resume to us or when we receive feedback from prospective employers about your resume, references and interview);
- (e) provide your Personal Information to third parties (including to our related bodies corporate, business partners and service providers, credit reporting bodies, credit providers, government agencies, public registries, search agencies, regulatory and licensing bodies, parties to whom you refer us (for example, previous employers and referees), identity verification service providers, competency or psychometric testing providers, payroll processing or other employment related service providers;
- (f) provide your Personal Information to publicly available sources of information (for example, online databases and social media); or
- (g) when otherwise legally authorised or required to do so.

3.2. When we collect Personal Information directly from you, we will take reasonable steps to notify you (using a collection notice) at, before, or as soon as practicable after, the time of collection. As a collection notice is specific to a particular collection of Personal Information, it will provide more specific information about our information-handling practices than this Privacy Policy.

4. How we use your Personal Information

We use and disclose your Personal Information for the purposes for which the information is collected, including (but not limited to):

- (a) providing or delivering recruitment and job placement services to you;
- (b) assisting with, or responding to, your queries;
- (c) informing you about our website, our recruitment services, work placements opportunities or other matters which we believe are of interest to employers and candidates;
- (d) assessing your suitability for a job placement, to verify your qualifications, skills, experiences and professional memberships and to confirm whether you have been the subject of any criminal, civil or workplace disputes, claims or sanctions;
- (e) any test or assessment (including medical tests and assessments) that a candidate might be required to undergo in connection with a work placement;
- (f) share with our Third Party Providers;
- (g) administer, improve and manage our recruitment and job placement services, website (including customising the advertising and content on our website) and relationship with you;
- (h) charge and bill you for the use of our recruitment and job placement services;
- (i) verifying your identity and credit worthiness checks of actual or potential clients;



- (j) for internal record keeping;
- (k) for direct marketing purposes (see section 6 below); and
- (l) complying with our legal and regulatory obligations.

5. Disclosure to Third Party Providers

5.1. In order to provide or deliver our recruitment and job placement services to you (whether you a candidate or employer) we may disclose your Personal Information to:

- (a) potential and actual candidates and employers;
- (b) referees or relevant professional associations or registration bodies;
- (c) our related bodies corporate, business partners, service providers, third party contractors, agents or suppliers;
- (d) authorised external service providers who perform functions on our behalf, such as financial and credit card institutions, internet and technology services providers, web developers, hosting companies, marketing, advertising and security service providers, fulfilment companies, credit reporting agents, debt collection agents, identity verification service providers, market research providers, competency or psychometric testing providers, payroll processing, immigration agents or other employment related service providers;
- (e) external business advisors, such as auditors, lawyers, insurers and financiers, (collectively, **Third Party Providers**).

5.2. We may also disclose your Personal Information to:

- (a) to any other party with your consent and direction; and
- (b) law enforcement bodies or regulatory authorities to assist with their functions, or as otherwise required or authorised by law.

5.3. Prior to the disclosure of Personal Information to Third Party Providers, we will take such steps as are reasonable in the circumstances to ensure that the Third Party Providers treat your Personal Information securely and otherwise complies with the relevant Australian Privacy Principles in relation to the Personal Information.

6. Marketing communications

6.1. We may use and disclose your Personal Information to send you information about the recruitment and job placement services we offer, as well as other information that may be of interest to you. We may send this information in a variety of ways, such as by mail, email, SMS, telephone, social media or by customising online content and displaying advertising on our website.

6.2. If you do not wish to receive any of these marketing communications, you can opt out by following the unsubscribe instructions included in the relevant marketing communication, or by contacting us using the contact details set out in section 12 below.



7. Overseas disclosures of Personal Information

- 7.1. All of our Third Party Providers are located in Australia and we do not disclose your Personal Information to overseas recipients in the course of providing you with access to our products or services.
- 7.2. If we subsequently decide to disclose your Personal Information and Sensitive Information to an overseas recipient, we will take such steps as reasonable in the circumstances to ensure that the overseas recipient treats your Personal Information securely and otherwise complies with the relevant Australian Privacy Principles.
- 7.3. If you have any questions in relation to the transfer of your Personal Information please contact us using the contact details set out in section 12 below.

8. Notifiable Data Breach Laws

In the event of any loss, or unauthorised access or disclosure of your Personal Information that is likely to result in serious harm to you, we will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with notifiable data breach scheme contained within the Privacy Act.

9. Security of your Personal Information

- 9.1. We will take steps that are reasonable in the circumstances to ensure that the Personal Information that we hold are protected from 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, accessible only by authorised staff.
- 9.2. We protect your information using physical, technological and administrative security measures to minimise and manage the risks of unauthorised access, disclosure, use and alteration of your Personal Information.
- 9.3. The transmission of information via the Internet is not completely secure. We cannot guarantee the security of your data transmitted to our online services and any transmission is at your own risk.
- 9.4. We will destroy or de-identify Personal Information the earlier of when it is no longer required or 7 years from the date it was collected by us, unless:
 - (a) you request that we delete your Personal Information; or
 - (b) we are otherwise required or authorised by law to retain the information.

10. Accessing and correcting your Personal Information

- 10.1. We take reasonable steps in the circumstances to ensure the Personal Information we hold about you is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your Personal Information that is collected and held by us.



10.2. If at any time you would like to access or correct the Personal Information we hold about you, or you would like more information about our approach to privacy, please contact us. We will grant you access to your Personal Information the extent necessary or authorised by the Privacy Act or other law and we take reasonable steps in the circumstances to correct Personal Information where necessary and appropriate.

10.3. To obtain access to your Personal Information:

- (a) you will have to provide proof of identity to ensure that Personal Information is provided only to the correct individuals and that the privacy of others is protected; and
- (b) we may charge you a reasonable administration fee, which reflects our costs in providing you with access to your Personal Information in accordance with your request.

10.4. 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.

11. Cookies

11.1. We use small text files placed on your computer called 'cookies' to collect standard log and visitor behaviour information in an anonymous form. We use this information to analyse how visitors use our website and to compile statistical reports on website activity. You can set your computer to reject cookies, but this may affect your ability to use certain parts of our website.

11.2. We may also log your IP address. Your IP address is your computer's electronic Internet address. We may collect your IP address to see trends, run the website, track user movements, and gather broad demographic information.

12. Privacy complaints

12.1. If you have any complaints or issues you wish to raise with us regarding the way we have handled your Personal Information, or would like to discuss any issues about our Privacy Policy, please contact us directly by email to Salexo Consulting Pty Limited at admin@salexo.com.au. Please provide us with full details of your complaint and any supporting documentation.

12.2. We will respond to you within a reasonable period of time to acknowledge your complaint and inform you of the next steps we will take in resolving your complaint. At all times, we will treat your privacy complaint seriously and in a confidential manner.

12.3. If you are unhappy with a response that you have received from us, you may direct your complaint to the Office of the Australian Information Commissioner.

13. Changes to this Privacy Policy

From time to time it may be necessary for us to review and revise our Privacy Policy. We may notify you about changes to this Privacy Policy by posting an updated version on our website. We encourage you to check our website from time to time to ensure you are familiar with our latest Privacy Policy.

