

## PRIVACY POLICY

### 1. Introduction

We manage personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles (APP)* – for more information, see [Australian Privacy Principles](#). This policy applies to information collected by Driftwood Group Pty Limited. 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.

#### 1.1. APP Entity

Driftwood Group manages personal information, as an APP Entity, under the [Australian Privacy Principles \(APPs\)](#).

#### 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, Human Resources and Project Management Consultancy;
- 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, Human Resources and Project Management Consultancy and is likely to differ depending on whether you are:

#### 2.1. A Workseeker or Coach Participant

The type of information that we typically collect and hold about Workseekers/Coach Participants 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:

- Work history, curriculum vitae, resume information
- Personal contact information
- Academic qualifications and transcripts
- Referee statements relating to your suitability for a specific role
- Other information as applicable

#### 2.2. A Client

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:

- Nature of the business
- Business contact details
- Organisational structure, chart, functional diagram
- Business strategic information
- Business process flows relating to staffing
- Human Resource functional information
- Other information as applicable

#### 2.3. A Referee

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:

- Referee contact details
- Nature of relationship with respective Workseeker
- Working relationship history and review information with respect to the Workseeker
- Other information as applicable

### 3. Purposes

The purposes for which we collect, hold, use and disclose your personal information are likely to differ depending on whether you are:

#### 3.1. A Workseeker or Coach Participant

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

- Work placement operations
- Recruitment functions
- Statistical purposes and statutory compliance requirements
- Career management and coaching assistance and advice

### 3.2. A Client

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
- Human Resource management and consultation purposes

### 3.3. A Referee

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

- To confirm identity and authority to provide references
- Workseeker suitability assessment
- Recruitment functions
- Referral information

### 3.4. Our Policy on Direct Marketing

Personal information that we collect and hold may be used for the purpose of marketing as follows:

- Direct marketing in the form of email newsletters, blog posts, emails and other communications sent by us or on our behalf, to you
- We do not obtain customer lists from any third party
- We use your personal information on an opt-in basis only
- You may at any time, opt out of any Direct Marketing by contacting us
- Driftwood Group adheres to the requirements of current anti-spam legislation as per the Spam Act 2003

## 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 or Coach Participants

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:

- You make an application for any position advertised by us
- You contact us directly to discuss your current and/or future career situation
- You provide us with referral information
- At other times as is relevant to the conduct of our normal business

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
- At other times as is relevant to the conduct of our normal business

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
- In the course of our receiving referral information from you
- At other times as is relevant to the conduct of our normal business

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

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
- Make a written online enquiry or email us through our website
- Submit a resume by email or through our website
- Otherwise contact us by alternative means

We may also collect personal information from other sources such as:

- Social networks and web searches
- Resume searching tools via online job-board systems
- Internet browsing
- Email traffic, referrals, other network partner connections
- Call and message logs
- Teleconference and Video conference information
- Register as a site user to access facilities on our site such as a job notification board

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 telephone or post if you have concerns about making contact via the Internet.

### 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
- Unauthorised access, modification or disclosure.

#### 5.1. Our Information Record System

Our information Record System includes the following:

- Cloud Storage eg. Dropbox, Gmail Mail Servers, Web Hosting Servers and equivalent
- Hard copy files and other paperwork, stored securely in our offices
- Information stored electronically may be viewed, edited and reprinted from secure online sources
- Mobile phones, tablets, computers and other devices may from time to time be used to securely access stored personal information
- Desktop computers, file servers and back-up systems may store personal information in a secure environment

#### 5.2. Information Security

Driftwood Group maintains policies and procedures to ensure the security of personal information held. These include:

- Staff training
- Information authorisation guidelines
- Password protection for data access, storage and backup
- Portable data security

### 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

### 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 including cloud storage 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
- Other Recruitment Agency partners

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. Overseas Disclosures

Some of your personal information is likely to be disclosed to overseas recipients. 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.

For further information please contact us.

## 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.

### 7.1. Access Policy

If you wish to obtain access to your personal information you should contact us. You will need to be in a position to verify your identity.

### 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.

## 8. Complaints

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

### 8.1. 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 also make complaints to the [Office of the Australian Information Commissioner](#).

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 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](#)