

“We”, “us” and “our” means Pace (VIC) Pty Ltd, ACN: 169 774 485, Pace (NSW) Pty Ltd ACN: 609 027 152.

We are bound by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**). This policy explains how and why we collect, use, hold and disclose your personal information.

You consent to us collecting, holding, using and disclosing your personal information, including sensitive information, in accordance with this policy.

What is personal information?

Personal information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information regardless of whether it is true.

Personal information includes sensitive information, where sensitive information is any information or an opinion that is both personal information and information about you:

- health information;
- criminal record;
- membership of a professional or trade association; or
- membership of a trade union;

Sensitive information will be used by us only:

- for the primary purpose for which it was obtained;
- for a secondary purpose that is directly related to the primary purpose;
- with your consent; or where required or authorised by law.

What personal information do we collect and hold?

We collect both personal information and sensitive information about you and your interactions with us, for example:

- when you use any of our services:
 - if you are a candidate;
 - when you provide us with the information necessary for us to determine your suitability for any role;
 - when we conduct reference checks on you or information that we otherwise obtain through contacting your former employers, work colleagues, professional associations, or registration bodies;
- when we receive the results of any required competency test or medical test;
- when we receive information about your performance in the workplace, whether that be negative or positive and including any complaints about your performance or your role in the workplace;
- when we receive information relating to any workplace accident that you were involved in or associated with;
- where we receive information about any investigation, litigation, insurance claim, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved;
- contact us in anyway, including through phone calls, emails, fax or otherwise visit our website.

The information we collect from you will include personal information and sensitive information including such as your identity and contact details, your health information as it pertains to your employment, and your use of our services.

We may collect information about how you access, use and interact with the website. We do this by using a range of tools such as Google Analytics. This information may include:

- (a) the location from which you have come to the site and the pages you have visited; and
- (b) technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system.

We use cookies on the website. A cookie is a small text file that the website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website. You may refuse to use cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of the website.

Why do we collect, hold and use your personal information?

We collect, hold and use your personal information, including sensitive information, so that we can:

- (a) provide you with services including finding and procuring work placements for you, and manage our relationship with you;
- (b) provide assistance with your work appraisals;
- (c) assess your ongoing performance and prospects regarding your employment or placement;
- (d) conduct tests and assessments in relation to your capacity to fulfil the inherent requirements of any placement;
- (e) assist you with any workplace rehabilitation;
- (f) manage any complaints, investigations or inquiries which relate to your employment or placement;
- (g) manage insurance claims related to your employment or placement;
- (h) contact you, for example, to respond to your queries or complaints, or if we need to tell you something important;
- (i) comply with our legal obligations and assist government and law enforcement agencies or regulators; or
- (j) identify and tell you about other services or placements that we think may be of interest to you.

If you do not provide us with your personal information, we may not be able to provide you with our services, communicate with you or respond to your enquiries.

How do we collect your personal information?

We will collect your personal information directly from you whenever you interact with us.

We may collect information from third parties such as:

- (a) from your prior employers;
- (b) persons you nominate for reference checks;
- (c) professional or trade organisations;
- (d) third parties that hold information about you that are relevant to the seeking of employment or placing you in a role or which we need to contact for the purposes of confirming education or qualification.

How do we store and hold personal information?

We store most information about you in computer systems and databases operated by either us or our external service providers. Some information about you is recorded in paper files that we store securely.

We implement and maintain processes and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

These processes and systems include:

- (a) the use of identity and access management technologies to control access to systems on which information is processed and stored;
- (b) requiring all employees to comply with internal information security policies and keep information secure;
- (c) requiring all employees to complete training about information security; and
- (d) monitoring and regularly reviewing our practise against our own policies and against industry best practice.

We will also take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the APPs.

Who do we disclose your personal information to, and why?

We may transfer or disclose your personal information to companies that are a part of the Pace network or to any third parties to whom we are engaged to provide recruitment or other employment related services.

We may disclose personal information to external service providers so that they may perform services for us or on our behalf.

We may also disclose your personal information to others outside our group of companies where:

- (a) we are required or authorised by law to do so;
- (b) you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- (c) we are otherwise permitted to disclose the information under the Privacy Act.

If the ownership or control of all or part of our business changes, we may transfer your personal information to the new owner.

Do we disclose personal information to overseas recipients?

We may disclose your personal information to recipients which are located outside Australia.

Do we use your personal information for marketing?

We will use your personal information to offer you placements and services we believe may interest you, but we will not do so if you tell us not to. These services may be offered by us, members of the Pace network, our other business partners or our service providers.

Where you receive electronic marketing communications from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication.

Access to and correction of your personal information

You may access or request correction of the personal information that we hold about you by contacting us. Our contact details are set out below. There are some circumstances in which we are not required to give you access to your personal information.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate and up to date.

Your rights under the EU GDPR

Under the European Union (EU) General Data Protection Regulation (GDPR), as a data subject you have the right to:

- (a) access your data;
- (b) have your data deleted or corrected where it is inaccurate;
- (c) object to your data being processed and to restrict processing;
- (d) withdraw consent to having your data processed;
- (e) have your data provided in a standard format so that it can be transferred elsewhere; and
- (f) not be subject to a decision based solely on automated processing.

Data subject rights

We have processes in place to deal with Data Subject Rights requests. Our actions and responsibilities will depend on whether we are the controller or processor of the personal data at issue. Depending on our role as either a controller or processor, the process for enabling Data Subject Rights may differ, and are always subject to applicable law.

Complaints

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us. Our contact details are set out below.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (OAIC) (www.oaic.gov.au) for guidance on alternative courses of action which may be available.

Contact details

If you have any questions, comments, requests or concerns, please contact Belinda Heffey at: belinda@pacevic.com.au

Changes to this policy

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy from our website or by contacting us at the contact details above.