

PRIVACY POLICY

INTRODUCTION

Infracon Australia respect the confidentiality of information and the privacy of individuals and manage personal information in accordance with the Privacy Act 1988 and Australian Privacy Principles. This policy applies to information collected by Infracon Australia Recruitment Pty Ltd (ABN 31 634 011 135). It outlines how we collect personal information and how we maintain, use, store and disclose the personal information we hold and reflects our commitment to you.

The Infracon Australia Privacy Policy will be reviewed and updated from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Please regularly check our Privacy Policy so that you are aware of these updates and changes. Any information we hold will be governed by the most current version of the Infracon Australia Privacy Policy, which is available at any time on the Infracon Australia website.

By accessing Infracon Australia's website and/or submitting your personal information to us through any means, you consent to the use of your information as described in this policy. If you do not agree with any terms of this Privacy Policy, please do not use Infracon Australia's website or send your details to Infracon Australia in any way.

KINDS OF INFORMATION WE COLLECT

For **job seekers** it includes information regarding your contact details, employment history, qualifications, aptitude/psychometric test results, opinions about your work performance (e.g. references), incidents at the workplace, and other information obtained or received by us in connection with your possible and actual work placements.

For **clients** it includes information regarding your company contact details, employee details, job descriptions, conversation logs, proposals for recruitment assignments, billing details and records, and other information obtained or received by us in connection with managing the presentation and delivery of our service to you.

For **referees** it includes information regarding your contact details, employment experience and relationship to the work seeker, and other information obtained or received by us in connection with the verbal or written reference.

Sensitive information is a special category of personal information under the *Privacy Act 1988*. It is information or opinions about you, including membership of a professional or trade association or membership of a trade union; criminal record; health information, racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, and sexual preferences or practices. As outlined in the *Privacy Act 1988*, sensitive information can, in most cases, only be disclosed with your consent.

PURPOSES AND USE FOR WHICH WE COLLECT PERSONAL INFORMATION

For **job seekers**, information that we collect, hold, use and disclose is typically used for work placement operations, recruitment functions, statistical purposes and statutory compliance requirements, client requests for contact details, service standard surveys for post registration functions, referral of work seekers to clients (with work seeker permission), and direct marketing services.

For **clients**, information that we collect, hold, use and disclose is typically used for client and business relationship management, recruitment functions, direct marketing services, statistical purposes and statutory compliance requirements, service standard surveys for post recruitment functions.

For **referees**, information that we collect, hold, use and disclose is typically used to confirm identity and authority to provide references, work seeker suitability assessments, validation of work seeker provided information, recruitment functions.

If you do not give us the information we seek we may be limited in our ability to provide recruitment services to you.

HOW YOUR PERSONAL INFORMATION IS COLLECTED

Personal information from **job seekers** 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 about **clients** may be collected when you provide it to us for business or business related social purposes.

Personal information about **referees** may be collected when you provide it to us in the course of our checking work seeker references with you and when we are checking information that we obtain from you about work seekers.

We may also collect personal information about **job seekers, clients and referees** 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.

Sometimes the technology that is used to support communications between us will provide personal information to us.

ELECTRONIC TRANSACTIONS

Sometimes, we collect personal information that individuals choose to give us via online forms or by email, for example when individuals:

- Request to be included on email lists such as job notifications or exceptional candidate summary reports
- Send general applications via our website or other job boards

It is important that you are aware of the risks associated with use of the Internet, and you should ensure that you are undertaking appropriate measures to protect your personal information.

SOCIAL MEDIA & WEB

Infracon Australia utilises both internet search engines, and social media to conduct relevant background checks. These may include details such as your name, or any other applicable identifying details.

GENERAL INFORMATION COLLECTED FROM VISITORS TO OUR WEBSITE

Users are advised that there are inherent risks in transmitting information across the internet. The Internet is an open system and Infracon Australia cannot guarantee that the personal information you submit will not be intercepted by others. Our websites may include links to external websites operated by other organisations. They may collect personal information from visitors to their site. Infracon Australia cannot guarantee the content or privacy practices of any external websites and does not accept responsibility for those websites.

WEBSITE ANALYTICS

To improve your experience on our site, we may use 'cookies'. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. You may refuse the use of 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 this website.

Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of such other sites. When you go to other websites from here, we advise you to be aware and read their privacy policy.

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

By using this website, you consent to the processing of data about you by Google in the manner described in [Google's Privacy Policy– external site](#) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or [use the opt-out service provided by Google– external site](#).

DIRECT MARKETING

If you have provided your personal details to Infracon Australia, we may use personal information to send you direct marketing material, but only subject to the following:

- Your personal information is only used for marketing purposes to allow Infracon Australia to provide:
 - **Job seekers** with updates in relation to employment opportunities, market information and promotions
 - **Clients** with market information and promotions
- Your personal information is not used by or disclosed to any third party for marketing purposes
- Client lists are not generally obtained from third parties for marketing purposes
- In accordance with the anti-spam legislation, individuals to whom marketing communications are sent are:
 - Chosen on the basis of having given their express and/or implied consent for such communications to be sent to them
 - Always given on opt out or unsubscribe option in relation to such communications – please see complaints section

WHEN WE COLLECT YOUR PERSONAL INFORMATION:

- We check that it is reasonably necessary for our functions or activities as a recruitment 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
- 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

HOW YOUR PERSONAL INFORMATION IS HELD

We hold personal information in a combination of secure computer storage facilities, paper-based files and other records at our secure premises and take a range of measures to protect your personal information from misuse, interference and loss; and unauthorised access, modification or disclosure. Personal information is held 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.

INFORMATION SECURITY:

Infracon Australia upholds strict policies, procedures and processes surrounding the collection, storage and security of information that we hold.

Our other staff policies that assist in protecting information include:

- It Usage Policy
- Social Media Policy

INFORMATION RECORD SYSTEM

Our Information Record System (JobAdder) is a recruitment CRM system where is held on secure servers owned by third party hosting providers and leased by JobAdder.

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

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
- T. contractors and database designers and Internet service suppliers
- Legal and other professional advisors
- Insurance brokers

ACCESS

Subject to some exceptions set out in privacy law, you can obtain access to your personal information that we hold. Important exceptions include:

- Evaluative opinion material obtained confidentially by us when undertaking reference checks; and access that would impact on the privacy rights of other people.
- Evaluative opinion material obtained confidentially by us when sourcing feedback from involved parties
- Evaluative opinion material created by us when assessing candidate suitability

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

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. We may impose a moderate charge to cover the administration of processing the request. Any time delay or charge will be discussed with you at the time you request access to your personal information.

CORRECTION

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.

ENQUIRIES, COMPLAINTS AND UNSUBSCRIBING

You can make enquiries, requests to access/delete or correct your information, or complain about alleged breaches of the APP's to our Privacy Officer:

Mr Mike Gray
Director
Infracon Australia
C/ 355 Scarborough Beach Rd
Osborne Park WA 6107

We aim to acknowledge receipt of all complaints within 10 working days and aim to resolve all complaints within 30 working days. This may not be possible in all circumstances depending on the contents of the complaint. In this situation, we will respond to your complaint in a reasonable time. If you are not satisfied with our response to your complaint you can contact the Australian Information Commissioner (Oaic).

Individuals have the option to unsubscribe from receiving marketing material at any time. If you would like to unsubscribe from receiving marketing material, please contact us or respond to any marketing email you receive from us with your request.

FEEDBACK

Infracon Australia has several areas on our website where you can submit feedback, under the 'contact us' section. Any feedback that is submitted through this area becomes the property of Infracon Australia. We may use this feedback, such as success stories or responses to surveys, for marketing purposes, or to contact you for further feedback on the site.

DEFINITIONS

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Cookies are small data files that may be placed on the hard drive of your computer when you visit www.infracon.net.au. Cookies permit the Infracon Australia server to identify your browser whenever you interact with us.