

# Privacy Policy

September 2015

## **Introduction**

We manage personal information in accordance with the Privacy Act 1988 and the Australian Privacy Principles. Intowork Australia and its group of businesses are committed to protecting the privacy and personal information of our clients, who generally include applicants for positions, students for training programs, apprentices and trainees and host employers and government agencies.

## **The kinds of personal information that we collect and hold**

We will collect information essential to providing our services, and information required by State and/or Federal Government Departments.

The information collected may differ for various clients, however, may include (but not limited to) the following:

- name and contact details
- date of birth and residency
- qualifications, work history, resume and application information
- bank account details and Tax File Number
- driver's license number
- police and working with children check clearances

## **How we collect and hold personal information**

We use a number of collection methods, however, where practical, we prefer to collect personal information directly from an individual or organisation. This is done by a person filling out a form, personal interview or meeting, phone conversations or from material supplied by a person such as a business card or resume. Information can also be collected from our websites through receiving position and placement applications and emails.

We may use temporary (session) cookies or permanent cookies when you access our web site. This allows us to recognise your browser and track the web pages you have visited. You can switch off cookies by adjusting the settings on your web browser. If you disable cookies on your browser or device, you may not be able to fully experience all features of the website.

## **The purpose for which we collect, hold, use and disclose personal information**

All means of collection of personal information will be by lawful and fair means and will be used and disclosed for the primary purpose for which it was collected. Typically this will include:

- communicating with our clients and suppliers
- managing and providing the organisation's services to our clients'
- complying with our legislative and regulatory responsibilities'
- conducting pre-employment checks
- marketing our services

## **Availability**

Our Privacy Policy is available and can be found on the IntoWork group of businesses websites. Should you request a copy of the policy it shall be provided free of charge.

## **Anonymity & pseudonymity**

We would reasonably require under Australian law to deal only with individuals who have identified themselves, and who do not use pseudonyms.

## **Collection of personal information**

We will only collect sensitive information if needed and if it is reasonably necessary or directly related to our functions or activities. This will only be collected if the individual consents.

## **Dealing with unsolicited personal information**

If we receive personal information and did not solicit the information we will within a reasonable period determine whether or not we could have collected the information if we had solicited the information and destroy it if not required.

We will destroy the information or ensure the information is de-identified if we believe that we could not have collected the personal information.

## **Notification of the collection of personal information**

Where possible we will take such reasonable steps to notify the individual of the personal details collected from someone other than the individual.

## **Dealing with personal information**

Any personal information collected for a particular primary purpose will only be used for that purpose, unless the individual has consented to the use and disclosure of the information for a secondary purpose.

## **Direct marketing**

We will not disclose any held personal information about an individual for the purpose of direct marketing unless:

- the individual has given consent
- the individual has requested not to receive direct marketing material.

## **Cross border disclosure of information**

We will not disclose personal information held to an overseas recipient.

## **Adoption, use or disclosure of government related identifiers**

We will not adopt a government related identifier of an individual as its own unless, it is required or authorised by or under Australian Law.

---

We will not use or disclose government related identifiers on an individual unless:

- the use or disclosure is necessary to verify the identity of the individual for the purposes of our activities or functions
- the use or disclosure of the identifier is reasonably necessary for it to fulfill its obligation to an agency
- it is required or authorized under Australian Law

### **Quality of personal information**

We will take such reasonable steps (if any) to ensure that the personal information collected is up-to-date, accurate and complete.

### **Security of personal information**

We will take steps to ensure the protection of personal information from:

- no misuse, interference and loss
- unauthorized access, modification or disclosure

All personal information you provide is held on secure servers.

We will destroy any information that is no longer needed in line with Australian legislation.

### **Correction of personal information**

We will correct our information if requested by an individual to ensure that it is accurate, up to date and complete.

If you believe that there is an error or information is missing then you should contact the Privacy Officer by email [privacyofficer@intowork.com.au](mailto:privacyofficer@intowork.com.au) and we will try to correct or add the information as soon as possible.

### **Access to personal information**

If you make a request for access to the personal information held on you, we will respond within a reasonable period after the request has been made. You will need to provide proof of identity in order to obtain access to your personal information.

We may charge you for the time and effort; however, the charges will not be excessive.

If we refuse to provide you with access then written notice will be provided setting out the reasons for refusal and the complaint process mechanisms available.

Reasons why a refusal may occur are varied and may include:

- that giving access would pose a serious threat to the life, health or safety of any individual
  - deemed to be frivolous or vexatious
  - information relates to legal proceedings
  - giving access would be unlawful
  - if access would prejudice negotiations with the individual
-

## **How to contact us if you have a complaint**

Please make contact by email to the [privacyofficer@intowork.com.au](mailto:privacyofficer@intowork.com.au)

At all times, privacy complaints will be treated seriously, dealt with promptly and in a confidential manner. If you make a complaint about privacy, we will acknowledge receipt of your complaint and commence an investigation into your complaint and will inform you of the outcome of your complaint within a reasonable period of time following the completion of the investigation.

---

## Version Control

Process Owner: Human Resources U/Management System//Policies
CEO Authorisation: April 2014, HR amendment to How we collect and hold personal information September 2015
Review Date: April 2016