



Policy: Privacy Policy

Purpose: To demonstrate the commitment to preserve the privacy of the personal information we collect.

Definitions: CPE - Connect Personnel Engineering

CPM - Connect Personnel Medical

THIS POLICY IS PUBLICLY AVAILABLE ON OUR WEBSITE

1 TRANSPARENCY

1.1 Connect Personnel Engineering and Connect Personnel Medical takes seriously its commitment to preserve the privacy of the personal information we collect.

We will only collect information that is reasonably necessary for the proper performance of our activities or functions as a recruitment agency.

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 do not collect, use or disclose personal information for unlawful purposes including discrimination. During the course of your interaction with CPE & CPM, you may provide us with unsolicited information and we will take reasonable steps to ensure that this information is purged from our systems providing it is not required for the proper performance of our functions and activities as a recruitment agency.

CPE & CPM acknowledges that an individual has the right to not identify themselves, or to use a pseudonym when dealing with us. However, this only applies if it is practicable for CPE & CPM to do so and it does not impact our service delivery to our clients.

CPE & CPM will not use government related identifiers for the purpose of identifying you unless required by law.

2 INFORMATION COLLECTION

It is necessary for our functions or activities as a recruitment agency to collect personal information about you. Information collection will commence at the point at which you either register your details on our website or contact us via email or phone. When we collect personal information, we will:



- 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.
- Record and hold your information in our information record system (see point 9 for further information on information record system). Some information may be disclosed to overseas recipients only as necessary for our functions or activities as a recruitment agency.
- retrieve your information when we need to use or disclose it for our functions and activities as a recruitment agency. At the 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 expectations, we permit you to access personal information in accordance with the Australian Privacy policy. Please see point 11.1 for more information on accessing your personal information.
- Correct or attach associated statements to your personal information in accordance with the Australian Privacy policy. Please see point 11.2 for more information on correction of your personal information.
- Destroy or de-identify any financial information we hold after a period of seven (7) years if it is lawful for us to do so. We do not destroy or De-identify information that is contained in the commonwealth record.
- Keep your personal information for a minimum of three (3) months, after which we may destroy or de- identify it if no longer serves our functions or activities as a recruitment agency.

3 KINDS OF INFORMATION THAT WE COLLECT AND HOLD

The type of 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 and is likely to differ depending on whether you are

- a workseeker- i.e. someone who is looking for a placement or work through us; or whom we have identified as person, who might be receptive to an offer of a placement or work through us; or someone who is looking to work at CPE & CPM.
- a client- i.e. someone other than a workseeker who is looking to acquire our services or whom we have identified as someone, who might be interested in acquiring our services;



- a referee – i.e. a person from whom we have sought facts or opinions regarding the suitability of one of our workseekers for work or positions through us; and who may be a Referee nominated by a client or us.
- A CPE & CPM employee i.e. a person who is currently, or was previously, employed by CPE or CPM
- Sensitive information is only collected with consent and where it is necessary for the performance of our functions and activities as a recruitment agency. Sensitive information will need to be collected where it relates to a genuine occupational requirement or an inherent requirement of the job or work being considered.

3.1 For Workseekers

The type of information that we typically collect and hold ranges from the personal to the sensitive. Information will only be requested as is necessary to assess amenability to work offers and work availability; suitability for placements; to comply with state legislation our clients work under or to manage the performance in work obtained through us.

It includes:

- Information submitted and obtained from workerseekers and other sources (e.g. Referees and Clients) in connection with applications for work;
- Personal details such as name, address, date of birth, gender, and contact information;
- Information about character, personality, skills and experience;
- Information about career path and preferences;
- Information about work entitlement and ability to undertake specific types of work;
- Work performance information
- Information about incidents in the workplace
- Information submitted and obtained in relation to absences from work due to leave, illness or other causes;
- Bank details for the purpose of making payment
- Criminal history records and working with children's checks
- Health records
- Tax file number, ABN or any other relevant pay rolling information



3.2 For Clients

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 may include:

- Client relationship information
- Information about position, contracting and hiring authority;
- Information about team structures and roles
- Information about incidents in the workplace;
- Company financials
- Credit history checks

3.3 For Referees

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 may include;

- Information about work position, authority to give a reference and preferred contact details;
- Opinions of the referee regarding the Workseeker's character and work performance or work environment
- Facts or evidence in support of those opinions, sometimes involving the Referees own knowledge and experience of having worked with the Workseeker.

3.4 For CPE & CPM Employees

The type of information we typically collect and hold about an employee is information ranging from personal to sensitive and is used to perform the normal functions of an employer. This information may include;

- Information submitted and obtained from the employee and other sources
(e.g. Referees or Clients) in connection with applications for work
- Information submitted and obtained from Workseekers and other sources
(e.g. Referees or Clients) in connection with applications for work



- Personal details such as name, address, date of birth, gender, and contact information;
- Information about character, personality, skills and experience;
- Information about career path and preferences;
- Information about work entitlement and ability to undertake specific types of work;
- Work performance information
- Information about incidents in the workplace
- Information submitted and obtained in relation to absences from work due to leave, illness or other causes;
- Bank details for the purpose of making payment
- Criminal history records
- Health information, only when it is required to tailor a workspace to meet an employee's health needs
- Tax file number

3.5 Photos and images

We may request proof of identification from you including certified original copies of your passport, visa and or drivers license and will only do so to for the proper performance of our functions and activities as a recruitment agency.

You should also read the section about electronic transactions because sometimes your communications with us may attach profile images of yourself that you have uploaded to the internet.

4.0 PURPOSES- WHAT WE NEED INFORMATION FOR

The purposes for which we collect, hold, use and disclose your personal information are those purposes that are reasonably necessary for the proper performance of our functions and activities as a recruitment agency and are likely to differ depending on whether you are:

- a Workseeker
- a Client
- a Referee
- a CPE or CPM Employee



4.1 For Workseekers

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

- work placement operations;
- recruitment functions;
- staff management;
- payment purposes;
- training needs assessment;
- risk management;
- work health and safety operations;
- marketing services to you; but only where this is permitted and whilst you are registered with us;
- statistical purposes and statutory compliance requirements

4.2 For Clients

Personal information that we collect, hold, use and disclose about clients is typically used for;

- Client and business relationship management
- work placement operations;
- recruitment functions;
- training needs and assessment
- risk management;
- work health and safety operations;
- marketing services to you;
- statistical purposes and statutory compliance requirements
- sponsorship applications
- District of Workforce shortage (DWS) applications
- Area of Need (AON) applications



4.2 For Referees

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
- Risk management

4.4 For Employees

Personal information that we collect, hold, use and disclose about Employees is typically used for;

- work placement operations;
- recruitment functions;
- staff management;
- payment purposes
- training needs and assessment
- risk management;
- work health and safety operations;

5 HOW YOUR 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
- a Referee
- a CPE or CPM Employee

sometimes the technology that is used to support communications between us will provide personal information to us- see the point 7 for more information on electronic transactions.



- 5.1 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.

Information will also be collected electronically via our telecommunications or email systems. See section 7 for more information on electronic transactions.

Personal information is also collected when

- We receive or give any reference about you;
- We receive results of inquiries that we might make of your former employers, work colleagues, professional associations or registration body;
- We receive the results of competency, psychometric, or medical test;
- We receive performance feedback (whether positive or negative)
- We receive any complaint from or about you in the workplace
- We receive any information about a workplace accident in which you were involved
- We receive any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved
- You provide us with any additional information about you;
- 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. We collect personal information about you from publicly available sources for inclusion in our records only as reasonably necessary for the proper performance of our functions and activities as a recruitment agency, and this information is managed in accordance with our privacy policy.

5.2 For Clients

Personal information about you may be collected

- When you provide it to us for business or business related purposes;
- Electronically through our telecommunications and technology systems- see the point 8 for more information on electronic transactions



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. We collect personal information about you from publicly available sources for inclusion in our records only as reasonably necessary for the proper performance of our functions and activities as a recruitment agency, and this information is managed in accordance with our privacy policy.

5.3 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
- for business or business social related purposes;
- Electronically through our telecommunications and technology systems- see the point 8 for more information on electronic transactions

5.4 For CPE & CPM Employees

Personal information will be collected from you directly when you fill out and submit on of our application forms or any other information connection with your application for work.

Information will also be collected electronically through our telecommunications and technology systems- see the point 8 for more information on electronic transactions

Personal information is also collected when

- We receive or give a reference about you;
- We receive results of inquires that we might make of your former employers, work colleagues, professional associations or registration body;
- We receive the results of competency, psychometric;
- We receive performance feedback (whether positive or negative)
- We receive any complaint from or about you in the workplace
- We receive any information about a workplace accident in which you were involved
- You provide us with any additional information about you;



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. We collect personal information about you from publicly available sources for inclusion in our records only as reasonably necessary for the proper performance of our functions and activities as a recruitment agency, and this information is managed in accordance with our privacy policy.

6 DIRECT MARKETING

We may use your personal information for the purposes of direct marketing. Where it is practicable to do so, we will obtain your consent, and you will be provided with the option to unsubscribe from direct marketing at any time. When it is not practicable to obtain consent, you will be provided with the option to unsubscribe from direct marketing once communications are sent. We market to candidates and clients using a variety of methods including email, phone, SMS and print material.

We may provide mass email technology system providers with your personal contact information for marketing campaigns that you have not unsubscribed from.

Any opinions you provide us such as testimonials may be passed onto a third party for the purpose of creating marketing material. In these cases, we will ask your consent before passing this information onto the third party.

We provide candidates and clients with the option to opt out of marketing material and upon receipt of this request their marketing preferences are updated on our systems.

If you do not wish to have your personal information used for direct marketing purposes, you may contact your recruitment consultant or our Privacy offer to request not to receive direct marketing communications from us. At which time your marketing preferences will be updated on our systems.

7 ELECTRONIC TRANSACTIONS

This section explains how we handle personal information collected from our website <https://www.connectpersonnel.com> and by other technology in the course of electronic transactions.

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 is important that you

- Know your rights; read our privacy policy, personal data collection & privacy notice
- Be careful what information you share on the Web
- Use privacy tools on the site- control access to your search listing and profile
- Make sure your anti-virus and data protection software is up to date

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;
- Follow, interact and converse via social networking platforms such as Facebook, Twitter, and LinkedIn

7.1 Social Networks and Web Searches

In order to access your suitability for positions and to assist you to find work, we will need to collect, use and disclose personal information about you. We will conduct background checking via social network media sites, Google, regulatory and immigration sites and medical registration boards, for the purposes of assessing suitability for representation by CPE & CPM.

7.2 Web Browsing

When you look at our website, our web hosting provider makes a record of the visit and logs (in server logs) the following information for statistical purposes:

- Your server address
- Your top level domain name (for example.com, .gov, .org, .au etc)
- The pages you accessed and pages downloaded
- The previous site you visited and
- The type of browser being used



We do not identify users or their browsing activities except in the event of an investigation where the law enforcement agency may exercise a warrant to inspect the internet service provider's server logs.

We do not accept responsibility for the privacy policy of any other site to which our site has a hyperlink, and it is advisable to look at the privacy policy of other sites before disclosing personal information.

7.3 Cookies

Cookies are uniquely numbered identification numbers like tags which are placed on your browser. By themselves cookies do not identify you personally, but they link back into a database record about you. If you register on our site will then link your cookie back to your personal information details.

This site uses cookies to monitor usage of our website, including sessional usage, to create a personal record of when you visit our website and what pages you view. Cookies are necessary to enable various activities, such as retaining and allowing you to update your registration details and work preferences, login, username and search queries on our web site, but if you do not wish us to retain any information about your visit to our site you can delete the cookies in your browser and change the settings in your web browser program.

The website statistics for www.connectpersonnel.com.au are generated from usage data, as outlined above and the analytics programs such as google analytics are used to view and access data.

7.4 Cloud Computing Services

In cases where we use cloud computing services we will take reasonable steps to ensure that our cloud computing services provider's term of service recognize 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

7.5 Emails

Our technology systems log email received and sent and may include voting and read and receipt notifications to enable tracking. Our mass email technology systems also collect usage data such as receipts bounce backs,



open, open location and click through rates and subsequent connectpersonnel.com.au website actions.

When your email address is received by us because you send a message, the email address will only be used or disclosed for the purpose of which you have provided. It may be added to a mailing list for the purposes of communicating with you, information we feel you would be interested in unless you specifically requested not to be added to any mailing lists, or you opt-out of receiving communications.

7.6 Call & Message Logs

Our telephone technology (systems and mobile phones) log telephone calls and messages received and sent and enable call number display.

When your call number is received by us because you phone us or send us a message, the number will only be used or disclosed as is reasonable for the proper performance of our functions and activities as a recruitment agency.

Our cloud computing system will also log SMS messages sent to and received from your mobile phone number and will only be used or disclosed for the purpose for which you have provided it.

7.7 Teleconferences & Video Conferences

Teleconferences and Video conferences may be recorded with your consent. In cases where it is proposed that they be recorded, we will tell you that the purpose for which they are to be used and retained.

7.8 Database

We use a recruiting database to log and record recruitment operations. This recruiting database is allocated on our server that allows disclosure to cross boarder recipients, only as is reasonable for the proper performance of our functions and activities as a recruitment agency. The database will contain personal details and documentation you have provided to us and will only be used or disclosed for the purpose for which you have provided it.

7.9 Mobile Access

Our staff uses laptops, tablets, phones and other portable electronic devices that allow them to access, retrieve and store your personal information. This is



used for recruitment purposes and will only be used or disclosed for the purpose for which you have provided it.

8 HOW YOUR PERSONAL INFORMATION IS HELD AND DISPOSED OF

When your personal information is collected it will be held in our cloud based recruiting database, on our website and on our network drive, all of which restrict user access without the use of approved login credentials. Information is also stored in hard copy filing systems that are locked and only accessed by persons authorised to do so as is reasonably necessary for the proper performance of our functions and activities as a recruitment agency. Financial information is held for a period of seven (7) years or at which time it will be de-identified or destroyed provided that it is lawful for us to do so.

Personal information will be held for a minimum of three (3) months after which we will destroy or de-identify it if it no longer serves our functions or activities as a recruitment agency.

CPM is a 100% shredding organisation; therefore, all hard copy documentation is disposed of using a company that provides secure shredding services or it will be shredded on site.

8.1 Information Security

We take all reasonable steps to ensure your personal information remains secure and confidential and is only used as is reasonably necessary for the proper performance of our functions and activities as a recruitment agency.

We take a range of measures to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure, these measures include:

- CPE & CPM trains its employees in their privacy obligations
- Document naming protocols for sensitive information
- "Clean desk" procedures where desks must be clean and clear of paper records
- Need-to-know and authorisation procedures
- Restricted employee access, limiting access to files and the database only within the employees' working umbrella (Medical or Engineering)
- Password protection
- Office alarm systems and restricted access after hours
- Policies on laptop, mobile phone and portable storage device security;



- Destruction of records, including by shredding and secure disposal
- Locked filing cabinets for hard copy documents with restricted access

9 DISCLOSURES

This section deals with our disclosure policies. Personal Information that we hold about you is only disclosed for the primary and related purposes for which it was collected, and with your consent. In this section you will find out about our policies dealing with

- General Disclosures
- Related Purpose Disclosures
- Cross Border Disclosures

9.1 General Disclosures

We may disclose your personal information for any of the purposes for which it is primarily held or for a related purpose where lawfully permitted.

We may disclose your personal information where we are under a legal duty to do so, including circumstances where we are under a contractual duty to disclose information.

Disclosure will usually be:

- to our related entities
- to our Clients
- to Referees for suitability and screening purposes

In addition to disclosures for general purposes, we may also disclose your personal information for a range of related purposes

9.2 Related Purpose Disclosures

We outsource several 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;
- Legal and other professional advisors;
- Background checking and screening agents;
- Marketing suppliers;
- Data cleansing 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.

9.3 Cross-Border Disclosures



Some of your personal information is likely to be disclosed to overseas recipients, or in the case of health records, outside of NSW in accordance with Health Records and Information Privacy Act 2002. The likely states and countries, type of information disclosed, and likely recipients are indicated. so far as is practicable, in the following table-

Country	Type of Information	Likely Recipients
New Zealand	Personal and sensitive information including but not limited to resumes, qualifications, results of background checks photo identification and or any other documentation required for the purpose of your job search or applications with regulatory or immigration bodies.	Our New Zealand based clients as is reasonably necessary for the proper performance of our functions and activities as a recruitment agency Contacts at the Medical Council of New Zealand for the purpose of medical registration applications. New Zealand Immigration lawyers for the purpose of immigration applications
The Philippines	Personal and sensitive information including but not limited to resumes, qualifications. results of background checks	Contractors for the purpose of providing recruitment support as necessary for our functions and activities as a recruitment agency
Australian states and territories	Health information	To clients based in states and territories, other than NSW when required as a condition of your employment.

We take reasonable steps to ensure that terms of service with overseas recipients 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.

10 ACCESS, CORRECTION & DELETION

You have a right to access, correct and request deletion of personal Information under the Australian Privacy Principles (Apps) and ELI General Data Protection Regulation (GDPR) 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.

You should also anticipate that it may take a little time to respond and process your application for correction as there may be a need to retrieve information from storage and review information in order to determine that information may be corrected. We will generally respond to your request for access within five (5) working days.

There is no charge to correct information

In some cases, we may not agree that the information should be changed.

If we refuse to correct your personal information as requested by you, we will give you a written notice that sets out;

- the reasons for the refusal except to the extent that it would be unreasonable to do so; and
- the mechanisms available to complain about the refusal

You may also ask us to associate a statement that the information is contested as being inaccurate, out of date, incomplete, irrelevant, or misleading and we will take such steps as are reasonable to do so.

You have the right to request deletion of your personal information. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

If you wish to request that your personal information be deleted, you should contact our office on 02 9170 0804 or info@cmedical.com.au. You will need to be in a position to verify your identity.



11 COMPLAINTS

You have a right to complain about our handling of your personal Information if you believe that we have interfered with your privacy in this section you can learn:

- How to complain
- How your complaint will be handled

11.1 How to Complain

If you are making a complaint about our handling of your personal information, it should first be made to us in writing.

You can make complaints about our handling of your personal information to our Privacy Officer on 02 9170 0804 or info@cmedical.com.au

11.2 How your complaint will be handled 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 establish what has happened and why;
- We will require a reasonable time (usually 30 days) to respond, if at this time a response cannot yet be provided, you will be notified of an updated timeline,
- If the complaint can be resolved by procedures for access and correction, we 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 the Australian and New Zealand IT Contract and Recruitment Industry body (ITCRA), an external dispute resolution scheme to which we belong <http://www.itcra.com> or to the Office of the Australian Information Commissioner <http://www.oaic.gov.au/privacy-complaints> NOTE: The ITCRA Code and Dispute Resolution Rules do NOT constitute a recognized external dispute resolution scheme for the purposes of the Australian Privacy Policy but are primarily designed to regulate the good conduct of ITCRA members

12 FUTURE CHANGES

This policy may change over time in light of changes to privacy laws, technology, and business practices. If you use our website regularly or conduct transactions with us that involve the collection of your personal information. It is important that you check this policy regularly to ensure that you are aware of the extent of any consent, authorisation or permission you might give.

REFERENCES

Australia privacy Amendment (Enhancing Privacy Protection) Act 2012.
Connect Personnel Medical Collections Notice