



Privacy Policy

(Revised: March 2014)

1. Introduction

Accountancy Connect (hereafter referred to in this policy as 'AC', 'we', 'our' or 'us') is a specialist accounting recruitment consultancy that provides permanent, contract and temporary solutions in industry and the accounting profession.

We manage personal information, as an APP Entity, in accordance with the *Privacy Act 1988* and the *Australian Privacy Principles (APP's)*.

Our staff are trained to respect the confidentiality and privacy of individuals and to adhere to our Privacy Policy.

2. Collection

We only collect information that is reasonably necessary for the proper performance of our activities or functions as a recruitment and on-hire 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 may decline to collect unsolicited personal information from or about you and take steps to purge it from our systems.

2.1 Kinds of information that we collect and hold

Personal information that we collect and hold that is reasonably necessary for the proper performance of our functions and activities as a recruitment and on-hire agency and is likely to differ depending on whether you are a Candidate, a Client or a Referee.

For Candidates

The kind of information that we typically collect and hold about you is necessary to determine your suitability to work offers and placements, your availability to work; or to manage your performance in work obtained through us. This includes:

- information submitted and obtained by you and other sources in connection with your application for work. This will include your name, telephone numbers, email, and position title;
- information submitted in connection with your resume, career profile and preferences;
- information submitted and obtained in relation to absences from work due to leave, illness or other causes;
- any reference about you in relation to work performance feedback;
- any information about incidents in the workplace where you are involved;
- any information and opinions obtained from current or former employers, work colleagues, professional; associations or registration and accreditation bodies;
- results of any skills, competency, pre-employment or medical tests/checks;
- information received resulting from a Police Criminal History Check;
- information resulting from insurance investigations, litigations, registration or professional disciplinary matters, criminal matters, inquests or inquiries in which you are involved;
- any information we are required to collect under Australian law to perform our recruitment services, such as taxation, superannuation, immigration or recruitment agency laws.



For Clients

The kind of information that we typically collect and hold about you is necessary is information that is necessary to help us manage the presentation and delivery of our services. This includes:

- information to manage our communication with you. This will include your name, telephone numbers, email, social media profile and position title;
- information obtained to deliver our recruitment services to you, including your career profile, company profile, staffing policies, organization charts, affiliated and global parent company profile, social media profiles and staff contact information;
- any reference we receive about you as part of our recruitment functions and activities;
- management of any complaints, investigations or enquiries in which you are involved that relate to our activities or functions.

For Referees

The type of information that we typically collect and hold about you is information that is necessary to make determinations about the suitability of one of our Candidates for particular jobs or particular types of work.

This includes:

- information to enable our communication with you such as your name, position title, company name, email and telephone numbers;
- information to confirm your working relationship with the candidate and the circumstances by which you are able to provide a reference on the candidate, including employment dates;
- information that you are able to provide to us about the candidate, including your opinions and assessments;
- your consent for us to use and disclose the information you provide to us to future employers and other relevant parties to our recruitment process.

2.2 Information collected about our website users

On a monthly basis we collect information about our website users collectively. This may include what pages our users visit more frequently, the length of visit to each page, device and browser types, keyword search and the geographic regions that users originate from. We will only use the data we collect anonymously and in aggregate. This information assists us in determining what is most beneficial for our users and how we can continually create a more positive and constructive website experience for our users.

2.3 Information Flow

When we collect your personal information;

- we check that it is reasonably necessary for our functions or activities as a recruitment and on-hire agency;
- we check that it is current, complete and accurate. This will sometimes mean that that 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 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 (APP's);
- we correct or attach associated statements to your personal information in accordance with APP:13 of the (APP's);



- 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.

3. Purposes

Primary Purpose

The primary purposes for which we collect, hold, use and disclose your personal information are likely to differ depending on whether you are a Candidate, a Client or a Referee:

For Candidates

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

- actual or possible permanent or on-hire placement management and operations;
- assessment of suitability, pre-employment testing and checking;
- candidate care programs;
- delivery of payroll functions;
- ongoing performance management during a placement;
- career guidance;
- marketing opportunities we may be assisting you with (*refer to section 7:Direct Marketing*)
- social media marketing campaigns; (*refer to section 7:Direct Marketing*)
- statistical purposes and statutory compliance requirements;
- recruitment functions;
- insurance claims or proposals;
- Police Criminal History Checks;
- management of any Workplace Health and Safety (WHS) complaints, inquiries or investigations in which you may be involved;
- any workplace rehabilitation program as a result of a WHS directive;

For Clients

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;
- social media marketing campaigns; (*refer to section 7: Direct Marketing*)

For Referees

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

- confirmation of identity and authority to provide references;
- Candidate suitability assessment;
- recruitment functions;
- marketing services to you; (*refer to section 7: Direct Marketing*)

Secondary Purpose

We may use and disclose your personal information for any secondary purpose you consent to, or when it is:

- required under Australian law or authorized by a tribunal/court order;
- necessary to take appropriate action to investigate a reasonable suspicion of unlawful activity or serious misconduct that affects our functions or activities;
- necessary for the establishment, exercise or defence of a legal or equitable claim.



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 Candidate, a Client or a Referee. Wherever possible we will collect your personal information from you directly and with your consent.

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.

Photos and 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.

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 or our candidate marketing mail out listing;
- 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' our company LinkedIn profile or 'Like' our company Facebook page.

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 Office of the Australian Information Commissioner's* resource on *Internet Communications and other Technologies*.

You can contact us by landline, telephone or post if you have concerns about making contact via the internet.

Other means by which we will collect personal information are likely to differ depending on whether you are a Candidate, Client or Referee:

For Candidates

Personal information will generally be collected from you directly when you apply for an advertised position, register online via our website, complete and submit one of our registration forms, or provide us with any other information in connection with your application or registration.

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 APP's and our Privacy Policy.

For Clients

Personal information about you may be collected when you or your employer provide it to us for business or business related social purposes.



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 APP's and our Privacy Policy.

For Referees

Personal information about you may be collected when you provide it to us in the course of our checking Candidate references with you and when we are checking information that we obtain from you about Candidates.

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.

Our Information Record System

We hold personal information in a combination of secure storage facilities and paper based files. All hard copy information is stored within our head office or transferred to a secure, archive facility. Electronic and online forms are stored on our business server and on our contracted IT provider's offsite server.

Information Security

We take a range of measures to protect your personal information from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

Such measures include, user staff training, "clean desk" policies, time out screen displays, read-only and password protected documents and networks, security document shredding, antivirus protection monitoring, mail guard filters, secure and locked filing units, authorised policies and procedures and contracted service suppliers who comply with Australian privacy law.

6. When do we disclose your personal information?

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. Wherever possible, we will only disclose our personal information with your consent.

Disclosure will usually be:

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

Related Purpose Disclosure

We outsource a number of services to contracted service suppliers (CSP's) from time to time. Our CSP's may see some of your personal information. Typically our CSP's would include our software solutions providers, IT programmers, website developers and designers, internet service suppliers, insurance brokers, superannuation fund managers, background checking and screening agents, psychometric skills assessors, loss assessors and underwriters.

We take reasonable steps to ensure that the terms of service with our CSP's 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.



Cross-Border Disclosure

We will only transfer personal information to an overseas recipient or recruitment agency located in the United Kingdom in circumstances provided under APP:8 such as when required by law, or where you provided consent..

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.

7. Direct Marketing

We comply with the requirements of anti-spam legislation.

At times we may use or disclose your personal information for the purposes of conducting direct marketing, such as sending you email notifications about potential job opportunities, events, recruitment news, competitions or newsletters.

We will only use your personal information we hold for direct marketing purposes with your consent, or where it is reasonable for you to expect us to do so. If we obtain your personal information from third parties (such as online job networks you have registered with), we will seek your consent, where practical, before conducting direct marketing with you.

We will provide you with the opportunity to request not to receive direct marketing, and we will provide you with a simple means to opt out from our direct marketing at any time.

8. Data Quality

We will, to the best of our ability, ensure that the personal information we collect, use and store is accurate, complete and up to date. This will sometimes mean that we may need to cross check the information that we collect from you with third parties. We may need to cross check it again, if we retrieve it from our systems and some time has passed since we last checked it.

We will take reasonable steps to confirm the accuracy, completeness and relevance of your personal information before we use or disclose to third parties. For example, we will always gain your consent before disclosing to potential employers or candidates. We may need to contact you again to check your personal information if we retrieve it from our systems and some time has passed since we last checked it.

If your personal information changes please advise our consultants as soon as practicable so that we can update our records accordingly.

9. Openness and Transparency

Under APP:1, to reflect our commitment to being open about our information handling, we provide access to our full Privacy Policy by having it on display in our office as well as providing a free downloadable version on our company website.

Our Privacy Coordinator is able to respond to any questions you have about our privacy practices, procedures and systems. Our Privacy Policy is kept up to date and is clearly expressed.



10. Anonymity

Under APP: 2, you have the option of not identifying yourself, or of using a pseudonym when interacting with us, whenever practical and lawful to do so.

For example, you may apply for one of our advertised positions anonymously or by using a pseudonym, however this will significantly limit our ability to represent you if we do not have your consent to collect and use your personal information for our primary purpose of providing recruitment systems.

11. Identifiers

With your consent, or where specific laws require it, we may request Commonwealth Government agency identifiers such as your Tax File Number and Medicare numbers to assist in providing recruitment services to you. These will not be requested, used or disclosed without your consent.

12. Access to and correction of your personal information

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 us performing reference checks; and access that would impact on the privacy rights of other people. In many cases evaluative material gained 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.

12.1 Access Policy

If you wish to obtain access to your personal information, you should contact our Privacy Coordinator at our office on 03 9585 2033. You will need to be in a position to verify your identity.

We will require a minimum of five (5) business days' notice (depending on the nature of the information being accessed), as we may need to retrieve information from archives, storage or back up.

We permit you to access the personal information we hold about you, subject to exemptions listed in APP: 12, such as when the disclosure would pose a serious threat to an individual or public health and safety, or where unlawful activity is suspected.

If we do refuse you access to your information, we will provide you with written notice explaining the reasons for refusal, and details of our compliance mechanism.

For more information about applying to correct your information please refer to our Correction Policy.

12.2 Correction Policy

If you find that the personal information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to correct it by contacting us.

If you advise us that the personal information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading we will take reasonable steps to correct it and advise any other entities to whom we previously disclosed your information, of this amendment.



If we do refuse to correct the information, we will provide you with written notice explaining the reasons for refusal, and the process to which you can follow should you wish to lodge a complaint.

We will require a minimum of five (5) business days' notice (depending on the nature of the information being accessed), as we may need to retrieve information from archives, storage or back up.

13. Complaints and how to contact us

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

You can make complaints about our handling of your personal information to our Privacy Coordinator (*see section on Privacy Coordinator*).

You can also make complaints to the Office of the Australian Information Commission.

Complaints may also be made to RCSA, the industry association of which we are a member. RCSA administers a Code of Conduct for the professional and ethical conduct of its members. The RCSA Code is supported by rules for the resolution of disputes involving members. *(Please note: The RCSA Code and Dispute Resolution Rules do NOT constitute a recognized external dispute resolution scheme for the purposes of the APP's; but are primarily designed to regulate the good conduct of Association members).*

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 authorized 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 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 to any recognized external dispute resolution scheme to which we belong or to the *Office of the Australian Information Commissioner*.

14. Privacy Officer

Our Privacy Coordinators' contact details are:

Name: Rachael Page
Address: Suite G01, 75 Tulip Street, Cheltenham, Vic 3192
Phone: +61 3 9585 2033
Email: rachael@accountancyconnect.com.au