

PRIVACY POLICY

1. Purpose

Apex Event Recruitment Pty Ltd ABN 60 634 769 592 (**Apex**) takes seriously its commitment to preserve the privacy of the personal information that we collect. This Privacy Policy sets out how Apex manages the collection, use, disclosure and handling of, or otherwise processes the personal information of its existing or prospective clients, candidates, referees, employees, contractors, suppliers and others with whom Apex deals with (**you**) in accordance with the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth).

2. Scope

This Policy applies to Apex's existing or prospective clients, candidates, referees, employees, contractors, suppliers and others with whom Apex deals with.

This Policy may change over time in light of changes to privacy laws, technology and business practice. If you use our website regularly or conduct transactions with us that involve us to collect 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.

As a contracted service provider to a range of Commonwealth, State and Territory government agencies, it may be necessary for us to collect and manage personal information as an Agency under different privacy arrangements. To find out if this may apply please contact us on the details noted above.

3. Definitions

In this Policy the following terms have the following definitions:

"Candidate" means someone who is looking for a placement or work through Apex or whom we have identified as a person who might be receptive to an offer of a placement or work through us. In this procedure, reference to a "Candidate" includes reference to a work seeker, referee and clients, as defined in the Privacy Policy, unless otherwise defined.

"Client" means someone other than a Candidate who is looking to acquire our services as a recruitment agency or whom we have identified as someone who might be interested in acquiring our services.

"Personal Information" means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. Personal information includes information collected about an individual such name, address, bank account details and credit card information, photos, information about opinions and likes/dislikes, and can also be captured in business records generated by the business.

"Referee" means a person from whom we have sought facts or opinions regarding the suitability of one of our Candidates for work or positions through us; and who may be a Referee nominated by the Candidate, a Client or us.

"Sensitive Information" means a category of personal information which includes an individual's racial or ethnic origin, health or medical information, political opinion, membership information relating to a political association, professional or trade association or trade union, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practices, criminal record, genetic information. In this procedure information,

which has potentially serious consequences if misused, such as passport, visa and salary information, is treated in the same manner as sensitive information.

4. Types of personal information that we collect and hold

Apex may collect and hold personal information that is reasonably necessary for the proper performance of one or more of our activities or functions as a recruitment agency. The type of personal information that Apex collects and holds is likely to differ depending on the person’s relationship with Apex.

Apex will only collect sensitive information 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, for the purposes of the right to work in Australia verification or an inherent requirement of the job or work being considered. Our collection of some types of sensitive information is also governed by equal opportunity and anti-discrimination laws.

We may decline to collect unsolicited personal information from or about you and Apex may take such measures as we think appropriate to purge it from our systems.

4.1 For Candidates

Types of Information	Purpose
<ul style="list-style-type: none"> ● Information including name, address, email address, contact telephone number, gender, age, employment history, references, resume, medical history, emergency contact ● Information submitted and obtained from the Candidates and other sources (e.g. Referees or Clients) in connection with applications for work ● Information about personality, character, skills, qualifications and experience ● Information about career path and preferences ● Information about work entitlement and ability to undertake specific types of work ● Information about health status 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 and Tax File Number, for the purposes of invoicing Clients on a Candidate’s behalf and for direct payment during/following placement with some Clients ● Information required to undertake criminal history checks and obtain criminal history records ● Information required to ascertain a Candidates right to work in Australia – i.e. confirmation of citizenship, residency or visa status ● Proof of identification from you including copies of your passport, visa, driver’s license or any other relevant licences and will only do so for the performance of our activities or functions as a recruitment agency 	<ul style="list-style-type: none"> ● Assess amenability to work offers and work availability ● Assess suitability for placements ● Manage the performance in work obtained through us ● Work placement operations ● Recruitment functions ● Staff management ● Payment purposes ● Visa purposes ● Training needs assessments ● 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 ● To comply with any legal requirements we have under applicable labour hire licensing legislation in force from time to time

4.2 For Clients

Types of Information	Purpose
<ul style="list-style-type: none"> ● Information including name, address, email address, contact telephone number ● Information about position, contracting and hiring authority ● Information about team structures and roles ● Information about incidents in the workplace ● Client facility addresses, ABN, key personnel and contact details ● Credit check and financial information 	<ul style="list-style-type: none"> ● Help us manage the presentation and delivery of our services ● Client and business relationship management ● Work placement operations ● Recruitment functions ● Training needs assessments ● Risk management ● Credit checking ● Work health and safety operations ● Marketing services to you ● Statistical purposes and statutory compliance requirements ● To comply with any legal requirements we have under applicable labour hire licensing legislation in force from time to

4.3 For Referees

Types of Information	Purpose
<ul style="list-style-type: none"> ● Information including name, address, email address, contact telephone number, gender, age ● Information about work position and authority to give a reference ● Opinions of the Referee regarding the Candidates character and work performance or work environment ● Facts or evidence in support of those opinions, sometimes involving the Referee's own knowledge and experience of having worked with the Candidate 	<ul style="list-style-type: none"> ● To help make determinations about the suitability of one of our Candidates for particular jobs or particular types of work

4.4 For Others

For other persons Apex deals with we may collect information including name, address, email address, contact telephone number, business records, billing information, information about the goods and services supplied and any other personal information you choose to provide us that is reasonably necessary for the proper performance of our functions and activities as a recruitment agency.

5. Direct Marketing

Apex may use your personal information for the purposes of direct marketing except where you have specifically requested we don't. We market to Candidates and Clients using a variety of methods including email, social media (including Facebook, Twitter and LinkedIn), phone and print.

All approved direct marketing contains the option to opt out of receiving marketing material from. 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 Coordinator and request not to receive direct marketing communications from us, at which time your marketing preferences will be updated on our systems.

Should you wish to be removed from our recruitment software system, we will duly make you inactive and no longer contact you about prospective roles. Information that we have no present need for, will be removed from the database. However, your resume will remain on our database as it is linked to our record keeping processes and the manner by which our recruitment software operates.

6. 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, Client or Referee.

Sometimes the technology that is used to support communications between us will provide personal information to us (see Part 8 – 'Electronic Transactions').

6.1 For Candidates

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

Personal information about Candidates 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 any 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 are 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; or
- 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 is reasonably necessary for the performance of our activities or functions as a recruitment agency and this information is managed in accordance with this Policy.

6.2 For Clients

Personal information about Clients may be collected:

- When you provide it to us for business or business related social purposes; or
- Electronically through our telecommunications and technology systems.

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 is reasonably necessary for the performance of our activities or functions as a recruitment agency and this information is managed in accordance with this Policy.

6.3 For Referees

Personal information about Referees 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;
- For business or business related social purposes; or
- Electronically through our telecommunications and technology systems.

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 is reasonably necessary for the performance of our activities or functions as a recruitment agency and this information is managed in accordance with our Privacy Policy.

6.4 Other

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;
- Make a job application to us through an external job board or website;
- Follow and communicate with us via social media such as LinkedIn, Facebook and Twitter.

7. Electronic Transactions

This section explains how we handle personal information collected from our website www.apexeventrecruitment.com.au social media and by any other technology in the course of electronic transactions.

7.1 Social Networks and Web Searches

In order to assess a Candidate's suitability for positions and to assist a Candidate to find work, we conduct internet searches using search engines and regulatory or government agency sites by entering the Candidate's name and relevant identifying details.

7.2 Web Browsing

When you look at our website, our website host 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 documents 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 a 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 may link back to a database record about you. If you register on our site we will then link your cookie back to your personal information details.

This website uses cookies to ensure your next visit to the site is easier, enhancing your user experience. We use them, for example, to remember your search preferences, to make the information you see more relevant to you, to help you sign up for our services and to protect your data. It also allows us to effectively analyse how our visitors use our website and to monitor its performance.

If you do not wish us to retain any information about your visit to our site you might consider deleting the cookies on your browser and changing the settings on your web browser program.

7.4 Web Bugs

If we use web bugs we will display a clearly visible icon on the page. The icon will include the name of the company collecting information and will be labelled as a tracking device. The web bug will be linked to a page disclosing what data is collected, how it is used, and which companies receive the data. Web visitors will be able to opt out of data collection by web bugs. Web bugs will not be used to collect sensitive information.

7.5 Cloud Computing Services

In cases where we use cloud-computing services we will take reasonable steps to ensure that:

- Disclosure of your personal information to the cloud service provider is consistent with our disclosure obligations under the APPs. This may include ensuring that we have obtained your consent, or that the disclosure is for purposes within your reasonable expectations;
- Disclosure is consistent with any other legal obligations, such as the restrictions on the disclosure of tax file number information or the disclosure by private employment agencies of Candidate details;
- Our Cloud computing services provider's terms of service 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.

7.6 Emails

Our technology systems log emails received and sent and may include voting, and read and receipt notifications to enable tracking.

When your email address is received by us because you send us a message, the email address will only be used or disclosed for the purpose for which you have provided it and it will not be added to a mailing list or used or disclosed for any other purpose without your consent other than as may be permitted or required by law. Exception to this rule: Your email address, details, information and records as provided by email will be added to our information record system for the purposes of recruitment services.

7.7 Call & Message Logs

Our telephone technology (systems and mobile phones) logs telephone calls and messages received and sent and enables call number display, which may include your profile picture if you have provided it.

When your call number is received by us because you phone us or send us a message, the number (and profile picture) will only be used or disclosed for the purpose for which you have provided it and it will not be added to a phone list or used or disclosed for any other purpose without your consent other than as may be permitted or required by law.

7.8 Teleconferences & Video Conferences

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

7.9 Database

We use a cloud-based database to log and record recruitment operations. This database contains the information and documentation you have provided us. This database operates from servers that permit disclosure to cross-border recipients. Your information will only be used or disclosed as reasonably necessary for the performance of our activities or functions as a recruitment agency.

7.10 Mobile Access

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

7.11 Paperless Office

Recognising the environmental advantages and efficiencies it provides, we operate a partially paperless office as a result of which your paper-based communications with us may be digitised and retained in digital format. The paper-based communications may be culled.

It is therefore important that, except where specifically requested, you do not send us originals of any paper based document and that you retain copies for your own records.

Where we do request original paper based documents we will return them to you once they are no longer required by us for the purpose for which they may be used or disclosed.

8. How your Personal Information is Held

When your personal information is collected it will be 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. However, your resume will remain on our database as it is linked to our record keeping processes and the manner by which our recruitment software operates.

8.1 Our Information Record System

Information you provide to us is stored in our secure cloud-based recruitment database and document storage system, which are restricted and accessible by staff through the use of individual log-in credentials.

Your information may also be securely stored in hard copy in a lockable filing system until such time as it is digitised and that information filed in our cloud-based document storage system. When this occurs, the hard copy document/s are subsequently destroyed.

Your information is also securely retained as part of our backup and Disaster Recovery processes. Backups are secured with access by the Executive and Privacy Coordinator of Apex only.

8.2 Information Security

We will take all reasonable steps to ensure the information you provide us remains secure and confidential and is only used for the performance of our functions or activities as a recruitment agency.

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

- Staff training;
- Password-protection of cloud-based database and document storage system;
- "Clean desk" procedures;
- Secure office premises with restricted access;
- Need-to-know and authorisation policies;
- Policies on laptop, mobile phone and portable storage device security;
- Document culling procedures including shredding and secure disposal.

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.

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:

- Internally and to our related entities;
- To our Clients; or
- To Referees for suitability and screening purposes.

9.2 Related Purpose Disclosures



In addition to disclosures for general purposes, we may also disclose your personal information for a range of related 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;
- I.T. contractors;
- Financial service providers;
- Database designers and Internet service suppliers;
- Legal and other professional advisors;
- Insurance brokers, loss assessors and underwriters;
- Travel-booking agents;
- Government bodies as required by law; and
- Background checking and screening agents.

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. The likely 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
USA	Any information held on our financial accounting system.	Our database provider holds data on their servers in the US.

We will take reasonable steps in the circumstances to ensure that the overseas recipient does not breach the APPs. However, we cannot guarantee that any recipient of your personal information will protect it to the required standard. 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.

10. Access and Correction

You have a right to access and correct personal information under the APPs. If you wish to obtain access to or correct your personal information you should contact our Privacy Coordinator. You will need to be in a position to verify your identity.

10.1 Access

You can gain access to the personal information that we hold about you subject to the exceptions that are set out in privacy law.

One exception is where giving access would have an unreasonable impact on the privacy of other individuals. This exception applies to evaluative opinion material obtained confidentially in the course of our performing reference checks where access that would impact on the privacy rights of the individual who provided the

reference confidentially. In such circumstances we may refuse access if the evaluative material contained in references would breach any confidentiality obligation we have with the reference.

10.2 Correction

If 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 our Privacy Coordinator. We will take reasonable steps under the circumstances to correct that information.

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 reasonable steps (if any) in the circumstances to give that notification unless it is impracticable or unlawful to do so.

10.3 Timeframe

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

10.4 Refusal

If we refuse to give access to or 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.

If we refuse to correct your personal information, you may ask us to place with the information a statement that the information is contested as being inaccurate, out of date, incomplete, irrelevant or misleading and we will take such reasonable steps under the circumstances to associate the statement with your information.

10.5 Cost

Depending on the nature of the request, we may need to charge you for providing access to the personal information. These charges will be reasonable, and we will let you know if a charge will apply before proceeding with the request.

We will not charge you for making the request to correct your information, correcting the information, or associating a statement.

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.

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 Coordinator on info@apexeventrecruitment.com.au

You can also make complaints to the [Office of the Australian Information Commissioner](#).

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 established 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 take your complaint the [Office of the Australian Information Commissioner](#).