

# PRIVACY POLICY

## Part A – About Worthwhile Recruiting

### What is Worthwhile?

Worthwhile Recruiting Pty Ltd (**Worthwhile, we, our**) is responsible for delivering recruitment and other consulting services directly to companies or organisations.

You can learn more about Worthwhile by:

- visiting the Worthwhile website [www.worthwhile.com.au](http://www.worthwhile.com.au)
- calling us on +61 2 9411 4649
- emailing any questions to us via [privacy@worthwhile.com.au](mailto:privacy@worthwhile.com.au)

### What are Worthwhile's privacy obligations?

Our policy is to respect and take reasonable steps to protect the privacy of all people connected with Worthwhile, including clients, prospective clients, employees, applicants, contractors, service providers and suppliers. This Privacy Policy tells you the kinds of personal information we, and others for us, collect and hold, how and why we collect and hold that information and how we use it. It also tells you how you can access and amend your personal information and how you may make a complaint if you think that we have breached our privacy obligations.

Personal information is information or an opinion about an individual whose identity is reasonably identifiable. Examples of personal information include a person's, name, address, date of birth and details about their employment history.

Privacy laws do not apply to the information of corporate entities, such as clients, however, the personal information of individuals connected with those entities (such as client or prospective client contacts) will be protected by privacy laws.

In dealing with personal information, we abide by the obligations imposed on us under federal law, including the *Privacy Act 1988* (Cth) (**Privacy Act**).

## Part B – Our personal information handling practices

### What kinds of personal information does Worthwhile collect and hold?

Most of the information we collect and hold includes (but is not limited to) data provided by you directly when you contact us, submit an application, attend an in-person recruiting event, through phone conversations, contact us about our services, or during your employment relationship.

We also collect data about individuals who are employed by our clients in connection with our provision of consulting services to those clients. This is generally obtained through our interaction with clients, suppliers and service providers.

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Privacy Policy Worthwhile Recruitment Pty Ltd Version July 2019

## PRIVACY POLICY

Please see **Appendix 1** for further details on the types of personal data we collect, store and use and the reasons we use your personal data.

Some of the personal information we collect is 'sensitive information' or 'health information', as described in the Privacy Act, and we will deal with that information only as required or permitted by law.

### **Do I have to give my name?**

We will, if practicable, allow you to choose not to give your name or identify yourself (unless this is against the law).

In some cases, if you do not provide us with certain personal information, we may not be able to provide you with the workforce solutions or employment requirements. This may affect whether you can become or continue to be a client, candidate or employee of Worthwhile.

### **How will the Worthwhile collect and hold personal information?**

We often collect personal information from people directly or from people who are authorised to represent them. While you do not have to provide us with all information requested, not providing this information to us may mean that:

- we may not be able to properly assist you with your workforce solutions or employment requirements
- decisions may be delayed while we seek further information; and
- we may not be able to provide services requiring an executed agreement.

We sometimes collect personal information from a third party if you have consented, been told of this practice, or would reasonably expect us to collect the information in this way. An example of this is collecting information from Centrelink who is managing a Child Support payment process.

We, or third parties acting on our behalf, may also collect personal information from Clients, state and territory governments and other Commonwealth government entities (for example, the Australian Tax Office) where this collection is authorised under law. The information collected is usually about employees or applicants.

We, or third parties acting on our behalf, may contact you by phone, for example, to facilitate your access to an employee or employer portal. In the event we do ask for certain personal information over the phone, we will only request this information once explaining the purpose for asking for this information and seeking your consent to proceed.

## PRIVACY POLICY

We may otherwise collect personal information from you via agreements, applications, or consent forms you provide, or other means of communication like via email, or our website.

If you are ever unsure about whether a person calling you is from Worthwhile, or calling on behalf of us, before you give them any information, you should ask the person to verify their identity, take their name and number and call us back at our office on 02 9411 4649. For more information please see **Appendix 1**.

### **Employees**

We collect personal information about employees and prospective employees in order to conduct employment and employment-related activities such as payroll services, recruitment and selection, performance management, reporting and work health and safety. Our collection, use, storage, and disclosure of personal information about employees and prospective employees is in accordance with the Privacy Act and *Fair Work Act 2009*.

For more information see **Appendix 1**.

### **How do we use and disclose personal information?**

We collect, hold, use and disclose personal information for the purpose of providing services, conducting our operations, communicating with applicants, employees and health service providers, conducting research and evaluation on and improving and promoting our services, and complying with our legal obligations. By providing personal information to us, you consent to us using your information for those purposes, and for any related purpose, or any purpose that could reasonably be expected at the time your personal information was collected or to which you otherwise consent.

We make a record or note of some phone calls to help us in ensuring that the service we provide meets the highest standards. We may use your information to seek feedback from you regarding your level of satisfaction with our services.

Email addresses provided through website queries will only be used for the purpose of responding to those queries and may be added to our mailing lists (unless that person has elected to unsubscribe to our mailing list).

If we need to disclose personal information outside Worthwhile, we will de-identify the information prior to disclosure, wherever it is practicable to do so. We will not normally disclose a person's personal information to anyone outside Worthwhile except where we refer candidates to clients; where that person consents; or where the disclosure is permitted or required under law.

Some examples of when we may disclose personal information include:

## RECRUITING SKILLED PEOPLE IS...**WORTHWHILE**

## PRIVACY POLICY

- in delivering Worthwhile services and our other functions (for example, quality assurance purposes, training and the purpose of improving our services);
- this is required or authorised by law;
- it will prevent or lessen a serious and imminent threat to someone's life or health or a threat to public health or safety;
- it is a necessary part of an internal investigation following a complaint; or
- we use a contractor to provide some Worthwhile services and the contractor needs personal information of certain candidates, employees, client contacts or other persons in order to perform that service.

Users of Worthwhile's computer systems may at times be able to see a person's name (if the person is a candidate, employee, client contact or other person known to Worthwhile) when performing duties either as an Worthwhile employee or on behalf of the Worthwhile, but are only permitted to record, use or disclose that information if it is directly related to performing those duties.

A state or territory government official may also have access to personal information as part of the intergovernmental arrangements.

We will not sell or rent your information to anyone and will not disclose your information overseas unless you agree to this (though you acknowledge and agree that your information may be stored on servers based overseas).

When we use third parties, such as contractors, to perform certain functions, we will take reasonable steps to ensure that the third party will also be required to treat personal information they may see or handle with care and confidentiality.

In the case of applicants under 18 we liaise with the people (such as a parent, guardian, representative or nominee) who are responsible for their welfare, rather than them directly.

### **How does Worthwhile deal with Tax File Numbers?**

If a person gives us their Tax File Number (**TFN**), we keep that information secure.

Due to legal restraints on the disclosure of TFNs, if a person asks us for their TFN, we will not be able to provide it to them. If a person wants to obtain their TFN, or the TFN of a family member, they will need to obtain this from the Australian Taxation Office directly.

In limited circumstances, the Australian Taxation Commissioner can be required by law to provide a person's TFN to us.

### **How does Worthwhile protect personal information?**

## PRIVACY POLICY

We take steps to ensure that no-one outside Worthwhile can access information we hold about someone without that person's consent, unless that access is authorised or required under law.

We have systems and procedures in place to protect personal information from misuse and loss, as well as from unauthorised access, modification or disclosure. These steps include:

- paper records are held securely;
- access to personal information is on a need-to-know basis, by authorised personnel;
- our premises have secure access; and
- storage and data systems and protections are regularly updated and audited.

When no longer required, personal information is destroyed in a secure manner, or archives or deleted in accordance with our obligations under federal law.

### **Worthwhile's web-based services**

We provide secure web-based services. However, users are advised that there are inherent risks in transmitting information across the internet, including the risk that information sent to or from a website may be intercepted, corrupted or modified by third parties. You can communicate with us, or provide documents to us, by a range of means, including in person or by post, as well as electronically (via email or through our website).

### **Does Worthwhile use cookies?**

A "cookie" is a small file supplied by Worthwhile and stored by the web browser software on a person's computer when they access our website. (An explanation of cookies can be found at the website of the [Australian Information Commissioner\(external\)](#).)

We use a session cookie for maintaining contact with a user throughout a web browsing session. At the end of the session, the user may choose to manually logoff and the cookie is immediately deleted. If a person does not logoff at the end of the session, we will automatically log that person off after about 20 minutes. This will ensure that no other person has access to this information. In order to use certain features which, personalise our website, users must use a browser which is enabled to accept cookies.

We analyse non-identifiable website traffic data (including through the use of third-party service providers) to improve our services and for statistical purposes. No attempt will be made to identify anonymous users or their browsing activities.

### **External links to third party websites**

Our website contains external links and widgets operated by certain third parties, such as Facebook, YouTube, Instagram, Twitter, LinkedIn and Google. These external third parties may not be subject to the Privacy Act. We are not responsible for the privacy practices of these third parties, or the accuracy, content or security of their websites. You should examine each website's privacy policies and use your own discretion regarding use of their site.

## PRIVACY POLICY

### **How can a person access or update the information Worthwhile holds about them?**

We aim to ensure that the information we hold about a person is accurate, up to date, complete and relevant before acting on it. If a person learns that personal information, we hold about them is inaccurate, outdated, incomplete, irrelevant or misleading, that person should contact us so that their information can be updated.

Where a person requests us to correct personal information, we hold about them, we will action this request promptly. A person can also request that we notify that change to any other agencies or organisations that we have previously disclosed the personal information to.

If we do not agree to correct our records as requested, we will give written notice of the decision, setting out our reasons for refusing the request and how that person can lodge a complaint about our decision. Where a person's own information can be provided to them, we will provide this information as soon as possible (and by no later than 30 days of the request).

If we do not agree to a request for access to personal information, we will take reasonable steps to give the person access to the information in an alternative form. We will also provide the person with a written notice setting out the reasons for refusal, and how they can lodge a complaint about the decision.

### **What if I have a complaint?**

If you would like to leave feedback, suggestion or complaint about the service you have received from us, or if you think we have breached your privacy obligations, please contact us via [email](mailto:privacy@worthwhile.com.au) at [privacy@worthwhile.com.au](mailto:privacy@worthwhile.com.au), or call us on 02 9411 4618

We will promptly investigate and resolve your complaint and respond to you as soon as possible. Sometimes this may mean we have to speak to other Worthwhile staff members who are handling your matter.

In all cases, we will inform you of the progress of your complaint.

If you are not satisfied with our response or how we handled your complaint, you may complain to the Office of the Australian Information Commissioner through [oaic.gov.au](http://oaic.gov.au).

### **How can you contact us regarding privacy matters?**

You can contact us by visiting [Worthwhile](http://Worthwhile) on our website, send an email to [privacy@worthwhile.com.au](mailto:privacy@worthwhile.com.au) or call us on 02 9411 4618

### **Updates to this Privacy Policy**

Worthwhile may update this Privacy Policy from time to time so please review it frequently.

# PRIVACY POLICY

## APPENDIX 1

	<b>What personal data we collect</b>	<b>The reason we use your personal data</b>
1	<p>Information you provide to us as part of the registration process and our relationship with you when you engage us to provide recruitment or job-matching services whether provided online, in-person, or by telephone, including:</p> <ul style="list-style-type: none"> <li>• <b>Name and contact information</b> – including: postal address, e-mail address, telephone number, and other similar contact data.</li> <li>• <b>Education, work history, and qualifications</b> – including your education history, employment history, work-related skills and experience, professional credentials or licenses, membership in professional organisations, career interests, preferences, qualifications, information provided by references, and other information provided on your résumé or Curriculum Vitae (CV).</li> <li>• <b>Demographic data</b>– including your date of birth, citizenship and Right to Work status, and contents of any other identification provided to Worthwhile for application or employment purposes.</li> <li>• <b>Identification data</b>– including your employee identification, driver’s license or passport, TFN or Superannuation fund details.</li> <li>• <b>Job-related social media data</b>– including collecting your information from and related to publicly published profiles you’ve created on job-related social media platforms and job boards (such as LinkedIn or Indeed)</li> <li>• <b>Performance and Employment data</b> – including information contained in your personnel file with Worthwhile, performance</li> </ul>	<p>We use this personal data:</p> <ul style="list-style-type: none"> <li>• to create, manage, and administer the individual's relationship with us;</li> <li>• to assess an individual's suitability for employment and employ individuals;</li> <li>• to match candidates with potential positions;</li> <li>• to offer candidates placement at our clients;</li> <li>• to refer an individual for employment to one of our clients;</li> <li>• to provide general work-seeking services to individuals;</li> <li>• to meet our obligations when acting as an employer in connection with the contract of employment and other obligations which apply to us under applicable employment laws;</li> <li>• to manage the employment relationship with an individual, including for human resources management (for example career development, training, talent management, performance management, appraisals, and disciplinary and grievance management);</li> <li>• to detect or prevent any inappropriate behaviour or breach of our policies, including protecting our intellectual property, confidential information, and assets;</li> <li>• for making contact in an emergency;</li> <li>• for ensuring that our systems are used primarily for business purposes, have sufficient capacity for the needs of the business, and are protected against cybersecurity threats such as malware;</li> <li>• to meet our obligations to an individual in respect of our contract with the individual when we act as an employment agency, recruiter, hirer, or outsourcing or consulting agency;</li> <li>• to contact individuals via regular mail, e-mail, phone, text messages, and online communication platforms about our company or job openings that match the individual's stated preferences, qualifications, and/or profile; these communications will only come directly from Worthwhile (or agents working on</li> </ul>

## PRIVACY POLICY

	<p>reviews, assessments, and disciplinary action.</p>	<p>behalf of Worthwhile). At all times, individuals may opt out of receiving these communications; for details see the Your Rights and Choices section below);</p> <ul style="list-style-type: none"> <li>• for the purposes of any potential and/ or actual litigation or investigations concerning us or any group company or its officers; and</li> <li>• to personalise and deliver content about our services to individuals. For example, where individuals share geolocation data with us, this will allow the individual to search for jobs or create job alerts within that geographic area.</li> </ul>
2	<p>Information that we receive from our clients and other third parties about their employees and other personnel that we require for the purposes of providing staffing consultancy and outsourcing services including:</p> <ul style="list-style-type: none"> <li>• <b>Name and contact information</b>– including: postal address, e-mail address, telephone number, and other similar contact data.</li> <li>• <b>Education, work history, and qualifications</b>– including your education history, employment history, work-related skills and experience, professional credentials or licenses, membership in professional organisations, career interests, preferences, qualifications, information provided by references, and other information provided on your résumé or Curriculum Vitae (CV).</li> <li>• <b>Demographic data</b>– including your date of birth, citizenship and Right to Work status, and contents of any other identification provided to Worthwhile for application or employment purposes.</li> <li>• <b>Identification data</b>– including your employee identification, driver’s license or passport, TFN or Superannuation Fund details</li> <li>• <b>Performance and Employment data</b> –including information contained in your personnel file</li> </ul>	<p>We use this personal data:</p> <ul style="list-style-type: none"> <li>• to provide staffing consultancy, outsourcing, and vendor management services;</li> <li>• for staff administration and operational purposes (for example, in relation to absences, pay, benefits, compensation, reimbursable travel, maintaining employee directories, enabling access to our systems and resources, managing authorisation controls, ensuring the security of our systems and resources, management forecasts, and planning changes in our organisational structure);</li> <li>• to manage the employment or outsourcing relationship, such as responding to inquiries, providing human resource services, processing and administering payments and payroll, administering benefits, providing counselling, training, or discipline, complying with work health safety, and internal policies, corporate management, career and performance monitoring, and employment contract/agreement administration</li> <li>• to provide, improve, or develop services we provide to our clients, suppliers, or service providers or to perform essential business operations. This includes performing data analysis, research, and studies to assess the candidate, employee, and contractor population for staffing and outsourcing services. This also includes analysing trends in hiring and placement opportunities, evaluating workforce trends related to requested and available skills and experience,</li> </ul>



## PRIVACY POLICY

	<p>with Worthwhile, performance reviews, assessments, and disciplinary action.</p>	<p>researching, implementing, and marketing business opportunities, succession planning, and corporate organisation. These tasks are necessary to recruit, match, and present potential placement opportunities for individuals in our staffing and outsourcing programs;</p> <ul style="list-style-type: none"> <li>• to detect or prevent any inappropriate behaviour or breach of our policies including protecting our intellectual property, confidential information, and assets;</li> <li>• for ensuring that our (or any of our group companies) systems are used primarily for business purposes, have sufficient capacity for the needs of the business, are protected against cybersecurity threats such as malware; and</li> <li>• for the purposes of any potential and/ or actual litigation or investigations concerning us or any group company or its officers.</li> </ul>
3	<p>Information collected about you which falls within "special categories of personal data" including:</p> <ul style="list-style-type: none"> <li>• <b>Screening data</b>– including drug, alcohol, and national police or background checks.</li> <li>• <b>Financial and benefits data</b> – including your national or tax file number (TFN) , superannuation fund details , financial or bank account information, tax-related information, next-of-kin or emergency contact information, benefits selections potentially including health insurance, retirement planning information, and disability and health-related information, including that related to a work-related claim (e.g. Workers’ Compensation Claim).</li> <li>• <b>Information relating to leaves of absence</b> - including sickness absence or family related leave.</li> <li>• <b>Information about your physical or mental health, condition, or disability status.</b></li> </ul>	<p>We use this personal data as outlined below:</p> <ul style="list-style-type: none"> <li>• In some jurisdictions, we must process this personal data in order to comply with statutes, rules, and regulations pertaining to equal employment opportunities. We may also ask you to provide additional information. The provision of this type of information will be voluntary, unless it is required by law, and failure to provide this information will not hinder your employment or project opportunities.</li> <li>• We collect and use Screening Data when consistent with a legal basis and only as authorised under applicable law.</li> <li>• We collect and use financial and benefits data to administer payments to you, provide employment-related health and retirement services, and other benefits applicable to your employment.</li> <li>• We use information relating to leave of absence to comply with employment and other laws, and to record and administer for example; personal/ carer’s leave, parental leave etc</li> <li>• We use information about your physical or mental health to ensure your health and safety in the workplace and to assess your fitness to work subject to appropriate confidentiality safeguards</li> </ul>

## PRIVACY POLICY

		and to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
4	<p>Information that we collect from <b>individuals representing organisations</b>, including:</p> <ul style="list-style-type: none"> <li>• contact details of individuals working for our clients, service providers, and suppliers.</li> <li>• contact details of individuals who attend our sponsored events, conferences, and webinars.</li> <li>• other personal information regarding such individuals.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• provide and manage staffing placement, consultancy, outsourcing, and vendor management services;</li> <li>• develop and maintain staffing and outsourcing relationships with our clients, suppliers, and service providers. We use the information, including delivering event and marketing communications, through e-mail, telephone, text messaging, direct mail, and online communication platforms. These notifications will provide instructions on how to opt out of receiving similar e-mails or communications from the service; and</li> <li>• improve our services and develop new services based on the preferences and behaviours of these individuals.</li> </ul>
5	<p>Information we collect through your use of our website, including:</p> <ul style="list-style-type: none"> <li>• <b>Website data</b>– We collect User ID, log-in credentials, password, and/or PIN.</li> <li>• <b>Location data</b>– We collect data about your location, such as Global Navigation Satellite System (GNSS) data (e.g., GPS), data identifying nearby cellular towers and Wi-Fi hotspots.</li> <li>• <b>Cookies and similar data</b> – As further described in our <a href="#">Cookie Policy</a>, we use cookies, web beacons, and other similar technologies to recognize and personalise your online experience with Worthwhile.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• identify issues with the website or application and user's experience of the website or application;</li> <li>• manage and administer our IT systems; and</li> <li>• monitor the way our website is used (including locations it is accessed from, devices it is accessed from, understanding peak usage times, and analysing what functionality and information is most and least accessed). Instead of having to type in your personal information, some of functionalities on our website may allow you to use third-party authentication tools such as Facebook, Twitter, and Google to populate certain fields. By authenticating through one of the social media options, you allow us to receive your personal and other information that is accessible through these tools. This information may be incorporated into your profile. For any such tool you choose to use, we encourage you to also review the tool provider's privacy policy and any terms and conditions.</li> </ul>
6	<p>Information when <b>you communicate with us</b> whether in person, through our website or via e-mail, over the</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• answer any issues or concerns;</li> </ul>

## PRIVACY POLICY

	<p>phone, through social media, or via any other medium, including:</p> <ul style="list-style-type: none"> <li>• your contact details (which can include your e-mail address or social media account details, depending on how you choose to communicate with us)</li> <li>• the details of your communications with us (including when you sent it, when we received it and where you sent it from (such as our website, post, telephone, e-mail, or social media))</li> <li>• the details of our messages to you (including information that you may post on our social media platforms)</li> </ul>	<ul style="list-style-type: none"> <li>• monitor communications for quality and training purposes;</li> <li>• develop new services which is based on the information you provide;</li> <li>• improve our services based on the information and feedback you provide and the information and feedback provided by others;</li> <li>• personalise our service to you to take account of the information and feedback you have provided; and</li> <li>• make necessary disclosures in response requests which we are legally required to comply with, to law enforcement or regulatory authority, body or agency, or in the defence of legal claims.</li> </ul> <p>We may use personal information to permit you to participate in live social media feeds. If you choose to participate, your public username may be displayed on the sites along with your post, including, but not limited to, comments, images, and video. We may provide you with access to third-party functionality that allows you to post content to your social media account(s). Any information that you provide through use of this functionality is governed by the applicable third party's privacy policy, and not by this Privacy Policy.</p>
7	<p><b>Information that we collect from third party partners or our customers, which</b> includes:</p> <ul style="list-style-type: none"> <li>• Credit reference agencies</li> <li>• Background screening companies</li> <li>• Identity verification companies</li> <li>• State or Federal Agencies</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• ensure that individual are genuine and to verify the information provided to guard against fraud and other criminal activities;</li> <li>• provide, manage, and administer our services to individuals and our clients;</li> <li>• manage and administer our IT systems;</li> <li>• personalise our service to you by complementing your behaviours and preferences;</li> <li>• perform statistical analysis and research into the individuals using our services so that we can better understand our users and develop and improve our services to meet the needs and preferences of our users and our clients; and</li> <li>• combine this information with other types of information mentioned above to create holistic profiles of our clients which allows us to make our services more personal and tailored to each client's preferences and habits.</li> </ul>

## PRIVACY POLICY

8	Information that we collect incidentally from <b>other sources or public sources</b> , including: <ul style="list-style-type: none"><li>• information available in the media;</li><li>• information presented on our social media or wider social media platforms including Facebook, Twitter, and LinkedIn;</li><li>• information collected by security systems</li></ul>	We use this information to: <ul style="list-style-type: none"><li>• maintain market awareness;</li><li>• build and maintain social media presence and branding; and</li><li>• provide security to our premises.</li></ul>
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