

## Privacy Policy

Version 6.0 – January 2018

ENHANCING WORKPLACE  
PERFORMANCE THROUGH



Recruitment



Consulting



HR Solutions

## Purpose

This policy is designed to support Davidson compliance with Australian Privacy Principles (APP) as well as supporting positive branding within the market and consumer confidence.

## Influences

Australia:

- *Privacy Act 1988 (Cth)*
- the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*
- *Privacy Regulations 2013* (the Regulations)
- Australian Privacy Principles (APP)
- Australian Government - Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au))
- Attorney General's Office – Commonwealth of Australia Law
- Office of the Information Commissioner Queensland ([www.oic.qld.gov.au](http://www.oic.qld.gov.au))
- Australian Psychological Society Code of Ethics

## Applications

This policy sets out how we, Davidson Group (Aust) Pty Ltd (ABN 43 167 652 155) and all its related entities handle your personal information (i.e. information about you or serves to identify you).

Please refer to our Credit Information Policy for information on how we collect, use, store and disclose information pertaining to your credit file. This policy is available by contacting us using the details in the section "[contact us](#)" below.

## Important

This policy is complemented by:

- Privacy Policy Accountabilities
- Issue Management Policy
- Data Integrity Policy
- Credit Information Policy

# PRIVACY POLICY

**Introduction** Your privacy is important to us. We therefore manage personal information in accordance with the Australian Privacy Act 1988 and the Australian Privacy Principles.

This policy applies to information collected by Davidson Group (Aust) Pty Ltd (ABN 43 167 652 155) and all its related entities.

Please refer to our Credit Information Policy for information on how we collect, use, store and disclose information pertaining to your credit file. This policy is available by contacting us using the details in the section "[contact us](#)" below.

We only collect information that is reasonably necessary for the proper performance of our activities or functions.

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.

This document will tell you how we manage your personal information as an [APP Entity](#) under the [Australian Privacy Principles \(APPs\)](#).

You will also be able to find out about the [information flow](#) associated with that information.

If you have any questions please [contact us](#).

Please note that this document contains some active hyperlinks to information on other websites. If you click these links you will be taken away from our website. We do not warrant the accuracy of any information on an outside website.

**APP entity** Davidson Group (Aust) Pty Ltd (ABN 43 167 652 155) and all its related entities, hereby referred to as "**Davidson**", "**we**", "**us**" or "**our**" manages personal information, as an APP Entity, under the [Australian Privacy Principles \(APPs\)](#).

Because we are a contracted service provider to a range of Commonwealth, State and Territory government agencies, it sometimes becomes necessary for us to collect and manage personal information as an Agency under different privacy arrangements.

**Information flow** When we collect your personal information:

- We check that it is reasonably necessary for our [functions or activities](#) as a company that delivers recruitment and human resource consulting solutions.
- We 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;
- 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 use or disclose it for our [functions or 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 the exceptions set out in APP 12, we permit you to [access](#) your personal information in accordance with APP 12.
- We correct or attach associated statements to your personal information in accordance with APP 13).
- 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. In Australia we do not destroy or de-identify information that is contained in a [Commonwealth Record](#).

## Kinds of information we collect and hold

Personal information that we collect and hold is information that is reasonably necessary for the proper performance of our functions or activities as a company that delivers recruitment and human resource consulting solutions and is likely to differ depending on whether you are:

- an individual (someone seeking work, advice or coaching, or someone that is required to do assessments)
- a client
- a referee

### For Individuals

The type of information that we typically collect and hold is information:

- that is necessary to assess amenability to work offers and work availability; suitability for placements; or to manage the performance in work obtained through us;
- needed to assist our clients with coaching, advice, mentoring;
- required to do assessments;

and includes (but is not limited to):

- Personnel information including contact details, bank account, taxation and next of kin details;
- Information about personality, character, skills, work experience, qualifications, career aspirations and preferences;
- Information about your right to work and ability to undertake specific types of work;
- Medical and criminal history;
- Aptitude and psychometric tests;
- Racial or ethnic origin;
- Political opinions; membership of a political association;
- Religious beliefs or affiliations;
- Philosophical beliefs;
- Work performance, or information about incidents in the workplace;
- Information submitted and obtained in relation to absences from work due to leave, illness or other causes;
- Memberships of professional or trade associations;
- Membership of trade unions;
- Information obtained to assist in managing client and business relationships.

### 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 includes (but may not be limited to):

- Contact details;
- Client relationship information including recommendations and advice;
- Information about company and team structures, roles, position descriptions;
- Information about contracting and hiring authorities;
- Internal policies and procedures;
- Visions, mission statements and values;
- Workplace performance solutions;
- Annual reports;
- Psychometric tests;
- Information about incidents in the workplace;
- Client reports.

- 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 work seekers for particular jobs or particular types of work and includes:
- Information about work position in the company, authority to give a reference and preferred contact details;
  - Opinions of the referee regarding the candidate's character, 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.

## Purposes

The purposes for which we collect, hold, use and disclose your personal information are likely to differ depending on whether you are:

- an individual;
- a client;
- a referee.

The following sections are also relevant to our use and disclosure of your personal information:

- Our policy on direct marketing;
- Overseas disclosures.

**For Individuals** Information that we collect, hold, use and disclose about individuals is typically used for:

- Work placement operations;
- Recruitment functions;
- Any test or assessment (including medical, aptitude and competency tests) that you might be required to undergo;
- Payment purposes;
- Statistical purposes and statutory compliance requirements;
- Networking opportunities;
- Staff management;
- Training;
- Insurance purposes;
- Workplace rehabilitation;
- Immigration, verify your work rights status;
- Work health and safety operations including Workers compensation / Accident Compensation Corporation (ACC) claims;
- Legal compliance in relation to some types of information;
- Research, development;
- Identification of your training needs;
- Individual, team and organisational development and improvement;
- Performance appraisals;
- Career guidance or management;
- Workplace rehabilitation;
- Insurance purposes and risk management.

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

- Client and business relationship management;
- Recruitment and placement functions;
- Marketing services to you;
- Statistical purposes and statutory compliance requirements;
- Networking opportunities;
- Insurance purposes and risk management;
- Career guidance or management;
- Performance appraisals;
- Workplace rehabilitation;
- Work health and safety operations;

- Direct marketing;
- Tenders, research, development, business systems and software testing to better assist you whilst providing our services to you;
- Identification of your training needs
- Individual, team and organisational development and improvement.

### For referees

Personal information that we collect, hold, use and disclose about referees is typically used for:

- Confirming identity and authority to provide references;
- Work seeker suitability assessment;
- Recruitment functions;
- Risk management.

### Our policy on direct marketing

We give individuals, clients and referees the direct option as to whether or not they wish to receive marketing communications or participate in marketing activity Personal information may be used for marketing purposes:

- Directly or via a third party;
- All electronic marketing communications give recipients the option to unsubscribe;
- Please [contact](#) our Privacy Officer to opt out of any marketing communications;
- We comply with the requirements of the anti-spam legislation.
- On occasion customer lists may be obtained from third parties for marketing purposes;
- Personal information may flow between us and third parties via electronic means.

## 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:

- an [individual](#);
- a [client](#);
- a [referee](#).

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 - see the section in this policy on [electronic transactions](#).

See also the section on [photos and images](#).

### For Individuals

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 or in connection with your online learning, training and support.

Personal information is also collected when:

- You provide us with any additional information about you;
- We receive the results of any competency, aptitude, psychometric or medical tests;
- We receive the results of any criminal checks;
- We receive the results of any eligibility to work checks;
- We receive performance feedback (whether positive or negative);
- We receive the results of inquiries that we might make of your former employers, work colleagues professional associations or registration body;
- We receive or give any reference about you;
- We receive any complaint from or about you in the workplace;
- We receive any information about a workplace incident in which you are involved;

- When provided to us by your friends or work colleagues;
- We receive any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved;
- Electronically through our telecommunications and technology systems – see the section in this policy 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. 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 APPs and our Privacy Policy.

### For clients

Personal information about you may be collected:

- When you provide it to us for business or business related social purposes;
- When provided to us by your friends or work colleagues;
- When we receive the results of psychometric tests;
- Electronically through our telecommunications and technology systems – see the section in this policy 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. 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 APPs and our Privacy Policy.

### For referees

Personal information about you may be collected when:

- A work seeker provides it to us;
- You provide it to us in the course of our checking work seeker references with you;
- When we are checking information that we obtain from you about work seekers;
- For business or business related social purposes;
- Electronically through our telecommunications and technology systems – see the section in this policy 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. 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 APPs and our Privacy Policy.

### 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.

At times video surveillance which operates in or near our premises may capture images of you.

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.

### Electronic transactions

This section explains how we handle personal information collected from our website [www.davidsonwp.com](http://www.davidsonwp.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 might help you to look at the Office of the Australian Information Commissioner's resource on [internet communications and other technologies](#).

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, email us through our website or through our other social media channels;
- submit a resume by email or through our website or through our other social media channels

You can [contact us](#) by land line telephone or post if you have concerns about making contact via the Internet.

See also the following topics:

- [Social networks and web searches](#)
- [Resume harvesting and job matching software](#)
- [Browsing](#)
- [Cookies](#)
- [Web bugs](#)
- [Cloud computing services](#)
- [Uploading photographs](#)
- [Emails](#)
- [Call and message logs](#)
- [Teleconferences and video conferences](#)
- [Database](#)
- [Mobile access](#)
- [Paperless office](#)

#### **Social networks and web searches**

In order to assess your suitability for positions and to assist you to find work, we will need to collect, use and disclose personal information about you. It is common practice for us to conduct background checks and research via social network media sites frequented by candidates. We also use search engines by entering your name and relevant identifying details. We will only search sites that are available in the public domain.

#### **Resume harvesting and job matching software**

We may also use external service providers to collate and process your applications such as anti-virus software, automated document scanners, formatting tools or transcribers.

#### **Browsing**

When an individual looks at our website, our internet service providers make records of the visit and logs (in server logs) the following information for statistical purposes:

- the individual's server address
- the individual's top level domain name (for example .com, .gov, .org, .au, .co, .nz, etc)
- the pages the individual accessed and documents downloaded
- the previous site the individual visited and
- the type of browser being used and other information as specified in the providers terms and conditions

Davidson does 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.

Our website also contains links to other websites and if you click these links you will be leaving our website. We do not warrant the accuracy of any information on an outside website.

## 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 may link your cookie back to your personal information details.

Our website uses cookies to monitor usage, to enable user registrations, employment enquiries, and to create a personal record of when you visit our website and what pages you view. You may choose to delete the cookies on your browser and change the settings on your web browser program to disable cookies altogether.

Our website also uses session cookies during a job search query on the website and when an individual accesses their profile. Our internet service provider does not employ cookies on our website except in those circumstances. The website statistics for this site are generated from the server logs as outlined above.

When an individual closes their browser the session cookie set by our website is destroyed and no personal information is maintained at Davidson which might identify an individual should they visit our website at a later date.

## Web bugs

We may from time to time use clear GIFs to monitor our website utilization and/or the success of an electronic marketing campaign. The data collected is not personally identifiable and only generic browser information may be collected to allow us to improve website compatibility or email communications.

## 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 Australian Privacy Principles s. 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 jobseeker 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.

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<b>Uploading photographs</b>	<p>We do not upload photographs of any individuals who have not given consent to the display of their photograph.</p>
<b>Emails</b>	<p>Our technology systems log emails received and sent and may include voting, and read and receipt notifications to enable tracking.</p> <p>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.</p>
<b>Call and message logs</b>	<p>Our telephone technology (PABX systems and mobile phones) log telephone calls and messages received and sent and enables call number display.</p> <p>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 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.</p>
<b>Teleconferences and video conferences</b>	<p>Teleconferences and video conferences 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.</p>
<b>Database</b>	<p>We use recruiting software and databases to log and record recruitment operations.</p>
<b>Mobile access</b>	<p>Davidson employees and contractors may be provided with mobile phones/smart phones as part of their daily business. These are locked down by PIN and SIM PIN. Employees and contractors may also be given secured remote connection to our dedicated terminal servers which are all protected by antivirus, firewalls, server password security and encryption.</p>
<b>Paperless office</b>	<p>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 confidentially retained, archived or destroyed as required.</p> <p>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.</p> <p>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.</p>

## 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.

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

- Misuse, interference and loss; and
- Unauthorised access, modification or disclosure.

### Our information record system

Information is primarily stored on Davidson servers located across several data centres across Australia and other secure data centres around the world. All confidential digital and paper copies are archived in a secured facility. Any data and communications stored in the cloud are encrypted and secured by 128-bit encryption keys and password protected, and two layer authentication process is utilized where possible.

### Information security

We protect information by taking a number of steps and strategies in the following areas :

- Governance
- ICT security
- Data breach
  - OAIC's Data breach notification guide [www.oaic.gov.au](http://www.oaic.gov.au) will be followed
- Physical security
- Personnel security and training
- Workplace policies
- Risk assessments, policies and procedures in place for the information life cycle
- Australian and industry/sector standards
- Monitoring and review

## Disclosures

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, including circumstances where we are under lawful duty of care to disclose information.

We may disclose information to:

- Davidson employees, contractors and to our related entities located in Australia (and any other countries where Davidson provide its services in the future) regarding possible work placements or to assist us in providing our services to you,
- to our clients,
- to our client's recruitment databases,
- to referees for suitability and screening purposes,
- our insurers,
- workers compensation (WorkCover) body,
- a purchaser of the assets and operations of our business, provided those assets and operations are purchased as a going concern,
- any person with lawful entitlement.

### Related purpose disclosures

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 solution providers;
- I.T. contractors and database designers and internet service suppliers;
- Legal and other professional advisors;
- Insurance brokers, loss assessors and underwriters;
- Superannuation fund managers;
- Background checking and screening agents;

- Psychometric and aptitude testing providers;
- Pre-employment medical advisors;
- Marketing agencies.

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.

### Cross-border disclosures

Some of your personal information is likely to be disclosed to our related bodies corporate, clients and third party service providers and suppliers (including technology service providers). These providers may be based overseas or use overseas infrastructure to perform services for us. These entities may be located in countries including Australia, Europe, Hong Kong, India, Japan, New Zealand, Singapore, United States, and the United Kingdom, Whilst every effort has been taken to ensure this list is accurate at the time of publishing, technology changes rapidly and so too does the location of where people store their data.

If you have any concerns about where your information is going, please [contact us](#) to ascertain if there have been any updates to this list since publication.

## Access and correction

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

For more information about access to your information see our [access policy](#).

For more information about applying to correct your information see our [correction policy](#).

### Access policy

If you wish to obtain access to your personal information you should [contact](#) our Privacy Officer. You will need to be in a position to verify your identity.

We might impose a moderate charge in providing access. Our Privacy Officer would discuss these with you.

You should also anticipate that it may take a little time to process your application for access as there may be a need to retrieve information from storage and review information in order to determine what information may be provided. We will generally respond to your request for access within 30 calendar days.

We may refuse a request made in accordance to APP 12 if the information requested is not readily retrievable; or the information requested does not exist or cannot be found. If we refuse access we will advise you and you have the right to complain about our handling of your personal information if you believe that we have interfered with your privacy. For more information please see our [complaints procedure](#).

### Correction policy

If you find that 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](#) us.

We will take such steps as are reasonable in the circumstances to correct that information to ensure that, having regard to the [purpose](#) for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

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 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 process your application for correction as there may be a need to contact third parties. We will generally correct your personal information within 30 calendar days.

Should we refuse to correct your information you may provide a statement specifying your disagreement with the decision, and we will make notes on the record by attaching that statement.

You have a right to complain about our handling of your personal information if you believe that we have interfered with your privacy. For more information please see our [complaints procedure](#).

## Complaints

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

For more information see our [complaints procedure](#).

### Complaints procedure

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

Complaints may also be made to [Recruitment and Consulting Services Association \(RCSA\)](#), 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.

NOTE: The Association Code and Dispute Resolution Rules do NOT constitute a recognised external dispute resolution scheme for the purposes of the APPs; but are primarily designed to regulate the good conduct of the Associations 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 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 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 recognised external dispute resolution scheme to which we belong or to the [Office of the Australian Information Commissioner](#).

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## Contact us

If you wish to contact us about your personal information you should contact our Privacy Officer

<b>Phone:</b>	+61 7 3023 1000 during normal office hours which are 8:00am to 5:30pm Australian Eastern Standard Time, Monday to Friday.
<b>Fax:</b>	+61 7 3221 5810
<b>Email:</b>	reception@davidsonwp.com
<b>Post:</b>	The Privacy Officer Davidson GPO Box 2572 Brisbane, Queensland, Australia 4001

If you need to contact us about your personal or sensitive information **urgently outside normal office hours** you may contact our Privacy Officer on: