



Chambers Recruiting Group Pty Ltd Privacy Policy

1. Introduction

We manage personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles*. This condensed policy applies to information collected by Chambers Recruiting Group Pty Ltd.

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.

By following the links in this document, you will be able to find out 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 flows associated with that information.

If you have any questions please contact us.

1.1. APP Entity

Chambers Recruiting Group 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.

If you wish to know whether this applies to you, please contact us.

1.2. Information Flow

When we collect your personal information:

- we check that it is reasonably necessary for our functions or activities as a private recruitment and on-hire agency.
- 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 (Database).
- we retrieve your information when we need to use or disclose it for our functions and activities. At that time, we check that it is current, complete, accurate and relevant. This will sometimes mean that we have to cross check the information that we collect from you with third parties once again - especially if some time has passed since we last checked.
- subject to some exceptions, we permit you to access your personal information in accordance with APP:12 of the (APPs).
- we correct or attach associated statements to your personal information in accordance with APP:13 of the (APPs).
- we destroy or de-identify your personal information when it is no longer needed for any purpose for which it may be used or disclosed provided that it is lawful for us to do so. We do not destroy or de-identify information that is contained in a Commonwealth Record.

2. Kinds of information that we collect and hold

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

- a Workseeker;
- a Client;
- a Referee;

2.1. For Workseekers

The type of information that we typically collect and hold about Workseekers 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 and includes:

- Resumes/CVs
- Licences
- Tickets
- Qualifications
- Personal information & work history

2.2. For Clients

The type of information that we typically collect and hold about Clients is information that is necessary to help us manage the presentation and delivery of our services and includes:

- Company details & information
- Job requirement details
- Client analysis

2.3. For Referees

The type of information that we typically collect and hold about Referees is information that is necessary to help to make determinations about the suitability of one of our Workseekers for particular jobs or particular types of work and includes:

- Contact details
- Answers/information given by the referee about the workseeker

3. Purposes

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

- a Workseeker
- 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

3.1. For Workseekers

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

- work placement operations;
- recruitment functions;
- statistical purposes and statutory compliance requirements;
- storing of relevant employment information on our database;

3.2. For Clients

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

- client and business relationship management;
- recruitment functions;
- marketing services to you;
- statistical purposes and statutory compliance requirements;
- storing of relevant employment information on our database;

3.3. For Referees

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

- to confirm identity and authority to provide references;
- Workseeker suitability assessment;
- Recruitment functions;

3.4. Our Policy on Direct Marketing

Chambers Recruiting Group treats all personal information with the utmost care and regard to ensure that it is protected. All personal information is stored on a secure database. Personal information will not be distributed to any third party for the purpose of marketing but will be stored on our database for the express purpose of ensuring we can carry out our functions and activities as stated in this document. The only third parties that may receive your personal information will be candidates, clients, referees and those involved in the recruitment process.

4. How your personal information is collected

The means by which we will generally collect your personal information are likely to differ depending on whether you are:

- a Workseeker
- 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 & Images.

4.1. For Workseekers

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.

Personal information is also collected when:

- You submit any information to us via electronic sources (email, messages, etc) as it is in connection to your application for work through us.

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.

4.2. For Clients

Personal information about you may be collected:

- when you provide it to us for business or business related social purposes;
- When you provide information to us through an application to us for recruitment services;
- When you submit enquiries online to be on our newsletter or to be registered on our database.

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.

4.3. For Referees

Personal information about you may be collected when you provide it to us:

- in the course of our checking Workseeker references with you and when we are checking information that we obtain from you about Workseekers;
- when you send us any information in any way in reference to a workseekers application for work.

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.

4.4. Photos & Images

Throughout the recruitment process it is beneficial for us to at certain times ask for photo ID to be scanned and stored on file for identification purposes. We will give you the option to supply this by asking you during our meetings conducted with you. If you do not wish for us to store photo identification of you you will have the option of us simply physically citing your photo ID and storing other types of ID.

4.5. Electronic Transactions

Sometimes, we collect personal information that individuals choose to give us via online forms or by email, for example when individuals:

- ask to be on an email list such as a job notification list;
- 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;
- connect and supply information via social media sites;

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 OAI's resource on [Internet Communications and other Technologies](#).

You can contact us by mobile or post if you have concerns about making contact via the Internet.

See also the following topics:

- Social Networks and Web Searches – Chambers Recruiting Group utilizes social media networks and web search sites. At times we will collect information given to us through these forums for the purpose of fulfilling our functions and activities.
- Resume submission and job matching software - Chambers Recruiting Group utilizes our website to allow workseekers to submit their resume and personal information. By submitting through this process individuals agree to give us permission to use this information to fulfil our functions and activities. We will collect and store this information given to us through these forums for the purpose of fulfilling our functions and activities.
- Cloud Computing Services - Chambers Recruiting Group at times will utilize cloud computing services to store and manage resumes and details to achieve our functions and activities. The information

will also be stored on external storage devices. By submitting information to us the individual understands that this is what occurs.

- Uploading photographs – as each individual gives us express approval to do so we will store and utilize photographs and photo ID to help us to achieve our activities.
- Emails – Chambers Recruiting Group utilizes email to communicate with many of our workseekers, clients and referees. Personal information will at times be collected from this source and individuals understand that this will be used to help us carry out our functions and activities.
- Database – the Chambers Recruiting Group database system collects and stores personal information, resumes and other related information of workseekers, clients and referees in order to assist us to carry out our express functions and activities.

5. How your personal information is held

Personal information is held in our Information Record System (Database) 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.

5.1. Our Information Record System

Chambers Recruiting Group stores, collects and utilizes personal information that is given to us on our online information record system. This is a secured site that professional IT technicians service in order to ensure that the information of our workseekers, clients and referees is kept in the most secure ways possible. If you have any questions about our processes to ensure that your information is secure please contact us.

- Most information is stored on our online secured database;
- Some information is stored locally on computer harddrives and is backed up to a secure external hard drive which is password protected and internally secured;
- Individuals that submit information (including Photo ID, documents and personal info) to Chambers Recruiting Group also agree that it may be stored on secured cloud computing.

5.2. Information Security

Information security is a high priority for Chambers Recruiting Group and an area that we approach with extreme care and investment. Our online database is extremely secured and we take great measures to ensure your personal information is protected. Here are a number of ways in which we ensure this is conducted to an excellent level:

- Staff training on the secure handling of private information
- Secured and encrypted online management database
- Need-to-know and authorisation policies
- Password protection on all types of storage
- Policies on laptop, mobile phone and portable storage device security;

6. 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.

Disclosure will usually be:

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

6.1. 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 solutions 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;

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.

6.2. Cross-Border Disclosures

It is not likely that your personal information will be disclosed to overseas recipients. However, we cannot guarantee that this will not occur in the future. We cannot guarantee that any recipient of your personal information will protect it to the standard to which it ought to be protected. The costs and difficulties of enforcement of privacy rights in foreign jurisdictions and the impracticability of attempting to enforce such rights in some jurisdictions will mean that in some instances, we will need to seek your consent to disclosure. If there is need for disclosure of private information to overseas recipients we will inform you of this first.

7. Access & 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.

7.1. Access Policy

If you wish to obtain access to your personal information you should contact us and we will direct you to the relevant person to discuss this matter. You will need to be in a position to verify your identity.

7.2. 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. Otherwise there is the option of logging on to change any of your information. We require this change to be approved first and is a condition of your application to be registered on our database system.

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.

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.

7.3. 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 Co-ordinator, whose contact details are Patrick Henley (Patrick@crgroup.com.au or 0449097717).

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

Complaints may also be made to [RCSA](#) [[Links to RCSA Website/Code Complaints Page](#)], 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 [*revise this statement if this should change*].

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](#).