



# PRIVACY POLICY - CLIENT AND CLIENT CONTACT

## 1. POLICY

The Synergie Group is committed to protecting the privacy of all persons who provide us with information in the provision of recruitment services and related commercial activity. We, at all times, ensure compliance with the Privacy Act 1988 (Cth) (the “Privacy Act”), including the Australian Privacy Principles.

This policy is specifically in relation to Client and Client Contact Privacy Policy and Collection.

## 2. SCOPE

The policy applies to all employees of the Synergie Group, including Synaco by Synergie, S&you and IPA by Synergie, and at all locations. The procedure also applies to temporary workers, contractors and consultants providing services to or on behalf of a Synergie Group company or any corporate entity that performs functions for or on behalf of the Synergie Group

## 3. STATEMENT

### 3.1. WHAT YOUR PERSONAL INFORMATION IS...?

As defined in the Privacy Act, personal information includes information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Personal information collected by the Synergie Group may range from the very sensitive (e.g. medical history or condition) to the everyday (e.g. name, address and phone number). It could include the opinions of others about your work performance, your work experience and qualifications, aptitude and psychological assessment results and other information obtained by us in connection with your possible work placements. Personal information includes sensitive information.

### 3.2. WHAT SENSITIVE INFORMATION IS...

Sensitive information is a special category of personal information. Sensitive information includes information such as health, racial or ethnic background, or criminal record. Higher standards apply to the handling of sensitive information and we will collect this information in accordance with the Australian Privacy Principles.

### 3.3. WHO WILL BE COLLECTING YOUR PERSONAL AND SENSITIVE INFORMATION...?

The Synergie group will collect your personal and sensitive information, for its own use, and on behalf of other members of the Synergie Group who might require access to your personal and



sensitive information for the purpose of work placements and associated services.

### ***3.4. HOW WILL YOUR INFORMATION BE COLLECTED?***

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

Personal and sensitive information will also be collected when:

- we receive any reference about you
- you attend an interview
- 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 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.

### ***3.5. HOW WILL YOUR INFORMATION BE HELD?***

Your personal information will be stored within secure systems and will only be accessible to authorised staff who require the information to deliver services in the way we have described in this Policy

### ***3.6. YOUR INFORMATION WILL BE USED...***

Your personal and sensitive information may be used in connection with

- your actual or possible work placement
- checking your work rights status with any government department or body (or their agents)
- criminal reference checking - directly or through an agent - with relevant government agencies



- your performance appraisals
- our assessment of your ongoing performance and prospects
- any test or assessment (including medical tests and assessments) that you might be required to undergo
- our identification of your training needs
- any workplace rehabilitation
- our management of any complaint, investigation or inquiry in which you are involved, or
- any insurance claim or proposal that requires disclosure of your personal or sensitive information.

We may also use the information collected to notify you about changes to our web sites, and to inform you of services, opportunities and special events that the Synergie Group believes that you will find valuable.

From time to time, we may also use the information to send you information about us, our related companies and possibly about third parties (we will send such information directly to you - your information will not be provided to third parties without your consent).

Your personal and sensitive information may be disclosed to:

- potential and actual employers and clients of the Synergie group referees
- other members of the Synergie group
- our insurers
- a professional association or registration body that has a proper interest in the disclosure of your personal and sensitive information
- a workers compensation body
- our contractors and suppliers - e.g., our I.T. contractors and database designers
- any person with a lawful entitlement to obtain the information.

### *3.7. IF YOU DO NOT GIVE US THE INFORMATION WE SEEK...*

- we may be limited in our ability to locate suitable work for you, and
- we may be limited in our ability to place you in work.



- you can gain access to your information and correct it if it is incorrect.

Subject to some exceptions which are set out in the Australian Privacy Principles, you have a right to see and have a copy of personal and sensitive information about you that we hold. If you are able to establish that personal or sensitive information that we hold about you is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date.

If we are unable to agree that personal or sensitive information that we hold about you is accurate, complete and up-to-date, you may ask us to place with the information a statement by you that claims that particular information is not accurate, complete and up-to-date.

### *3.8. How to contact us to access or correct your personal information.*

If you wish to contact us about your personal or sensitive information you should contact our Privacy Officers via email [privacy@ipa.com.au](mailto:privacy@ipa.com.au)

### *3.9. If you are not satisfied with the way in which we are handling your personal information...*

If you are concerned about any aspect of how IPA collect, hold, use or disclose your personal information, you may lodge a complaint via [privacy@ipa.com.au](mailto:privacy@ipa.com.au)

Your complaint will be investigated by a Privacy Officer and an outcome provided to you. Depending on your concern, an investigation may take up to 30 calendar days to complete.

If you are not satisfied with the outcome of your privacy complaint, you may wish to raise your concerns with the Office of the Australian Information Commissioner who will conduct their own assessment.

## **4. IMPLEMENTATION AND REVIEW**

All employees are responsible for maintaining the privacy of our client and client contact information as outlined in this policy. Employees will be made aware of this policy through the induction or roll out of this policy and agree to adhere to it.

This policy will be reviewed at a minimum every 2 years.