



Version 7.1

Privacy Policy



Introduction

Your privacy is important to us. We manage personal information in accordance with the Australian *Privacy Act 1988* (Cth) (**Privacy Act**) and the [Australian Privacy Principles \(APPs\)](#).

This policy sets out how we, Davidson Group (Aust) Pty Ltd (ABN 43 167 652 155) and all our related entities as an [APP Entity](#), manage your personal information (as defined in the Privacy Act). 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.

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.

If you have any questions about this policy or how we manage your personal information 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 APPs.

Information Flow

How we manage your personal information: for our [functions or activities](#) as a company that delivers recruitment and human resource consulting solutions.

- We take steps to ensure it is current, complete and accurate. This will sometimes mean that we have to cross check the information that we or collect from you with third parties, especially if some time has passed since its collection;
- We record and hold your information in our [information record system](#). Some information may be disclosed to [overseas recipients](#).
- We permit you to [access](#) your personal information, subject to and in accordance with APP 12.
- We correct 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](#).

Consent


By accessing our website or using our services (whether as an individual, client or referrer), you consent to us managing your personal information in accordance with this policy and as otherwise permitted by law. In the event that you provide us with personal information relating to a third party (such as a referee), you warrant that you have obtained the requisite consents from that third party in order to disclose their personal information to us and to allow us to manage their personal information in accordance with this policy or as otherwise permitted by law.

Variation

We may vary the terms of this policy at any time. You should check this policy regularly on our website so that you are aware of any variations made to the policy.

Purposes

We only collect personal information that is reasonably necessary for the proper performance, delivery and improvement



of our services, [functions or activities](#). The purposes for which we collect, hold, use and disclose your personal information are 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](#) or a [referee](#).

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

- [Direct marketing](#)
- [Overseas disclosures](#)

For Individuals

Personal information that we may 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;
- 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 and reporting;
- Research, development and statistical purposes;
- Individual, team and organisational development and improvement;
- Performance appraisals;
- Career guidance, management, coaching or mentoring;
- Insurance purposes and risk management.


For Clients

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

- Client and business relationship management and service delivery;
- Recruitment and placement functions;
- Marketing services;
- 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 may collect, hold, use and disclose about referees is typically used to:

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- Confirming identity and authority to provide references;
 - Work seeker suitability assessment;
 - Recruitment functions, including determining candidate suitability for roles or types of work;
 - Risk management.

Kinds of information we collect and hold

The type of personal information we collect may include the following (and can also differ depending on whether you are an [individual](#), a [client](#) or a [referee](#)).

We do not collect any sensitive information from you (such as race, ethnic origin, political opinions, religious or philosophical beliefs, or details of health or disability) except with your express consent (the information being reasonably necessary for us to carry out our functions) or as otherwise required or permitted by law.

For Individuals

The types of personal information we typically collect may include:

- Contact details, date of birth, bank account, taxation, superannuation and next of kin details;
- Drivers licence and other identification information;
- Information about personality, character, skills, work experience, qualifications, licenses held, career aspirations and preferences;
- Information about your right to work and ability to undertake specific types of work, including details of your visa (if applicable);
- Medical and criminal history;
- Aptitude and psychometric tests;
- Political opinions; membership of a political association;
- Racial or ethnic origin;
- Religious beliefs or affiliations;
- Philosophical beliefs;
- Images or photographs;
- 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 types of personal information we typically collect may include:

- Contact details;
- Client relationship information;
- Information about team structures, roles, position descriptions;
- Psychometric tests;
- Workplace performance and solutions;
- Information about incidents in the workplace;
- Client reports.

For Referees

The types of personal information we typically collect may include:

- 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;

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- Facts or evidence in support of those opinions, sometimes involving the Referee's own knowledge and experience of having worked with the candidate.

How your personal information is collected

Where it is reasonable and practical to do so, we will collect personal information directly from you, and by fair and lawful means. If we receive personal information about you that we did not ask for and we determine that we could have collected this information from you had we asked for it, we will notify you, as soon as practicable. If we could not have collected it, we will lawfully de identify or destroy that personal information.

We may also collect personal information from third parties and a range of 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. This sources may include newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from public sources for inclusion in our records we will manage the information in accordance with the APPs and our Privacy Policy.

The means by which we will generally collect your personal information vary and are likely to differ depending on whether you are an [individual](#), a [client](#) or a [referee](#).

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 and recordings](#).

For Individuals

Personal information may be collected from you in different ways, most commonly 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 may also collected when we receive:

- additional information about you that you or a third party provide to us;
- the results of any competency, aptitude, psychometric or medical tests;
- criminal checks or eligibility to work checks;
- performance feedback (whether positive or negative);
- the results of inquiries that we might make of your former employers, work colleagues professional associations or registration body;
- references;
- complaints from or about you in the workplace;
- information about a workplace incident in which you are involved;
- information provided to us by your friends or work colleagues;
- information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved.

For Clients

Personal information about you may be collected:

- When you correspondence with us or provide it to us in connection with our services, or for business or business related social purposes;
- from social networks or work colleagues;
- when we receive the results of psychometric tests;
- Use our services;

For Referees

Personal information about you may be collected when a work seeker provides it to us, you correspond with us or provide it to us in the course of our checking work seeker references with you or when we are checking information that we obtain from you about work seekers.



Photos, Images and Recordings

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.

On occasion our clients may request that an individual participate in a video interview (normally undertaken through a third party supplier of video services) or we may ask to take an audio recording of an interview for internal training purposes or to improve accuracy. In either case, your consent will be sought first.

Cookies and Electronic Transactions

This section explains how we handle personal information collected from our website www.davidsonwp.com and by other technology in the course of electronic transactions and communications.

There are inherent risks associated with use of the Internet and you should take all appropriate steps to protect your personal information online. Information and resources are available on the [OAIC website](#).

We may collect and receive personal information online, including via forms or by email. This may occur 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.

If preferred, you can also [contact us](#) by telephone or post.

SOCIAL NETWORKS AND WEB SEARCHES

We may collect personal information from social network and media platforms in the course of conducting candidate research and background checks to assess suitability for positions and assist candidates to find work. 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.

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
- the type of browser being used and other information as specified in the providers terms and conditions


We do not identify users or their browsing activities except, in the event of an investigation, where a law enforcement agency may exercise a warrant to inspect the internet service provider's server logs.

Our website contains links to other websites and if you click these links you will be leaving our website. These websites are maintained by third parties and we do not endorse or warrant the accuracy of any information they provide or accept responsibility for the privacy policy or terms and conditions which may govern than site.

COOKIES

Cookies are uniquely numbered identification numbers like tags which are placed on your browser. 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.

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. 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 retained by us 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.

EMAILS, CALL AND MESSAGE LOGS

Our technology systems log emails, telephone call and messages received and sent and may include voting, enable call number display as well as read and receipt notifications to enable tracking.

TELEPHONE AND VIDEO CONFERENCES

Teleconferences and video conferences may be recorded with your prior consent.

PAPERLESS OFFICE

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

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

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

Direct Marketing

Your personal information may be used for marketing purposes. We give individuals, clients and referees a direct option as to whether or not they wish to receive marketing communications or participate in marketing activity 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 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 our 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, including dedicated terminal servers which are all protected by antivirus, firewalls, server password security and encryption
- Data breach response protocols (Our own Data Breach Incident Management Procedure is based on OAIC's Data breach notification guide which will be followed in the event of a breach)
- 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

Notwithstanding the reasonable steps taken to keep information secure, breaches may occur. In the event of a security incident we have procedures in place to promptly investigate the incident and determine if there has been a data breach involving personal information and, if so, to assess if it is a breach that would require notification. If it is, we will notify affected parties in accordance with the requirements of the Privacy Act.

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 third party service providers
- 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,
- any person with lawful entitlement.

Related Purpose Disclosures

In order to provide our services, we outsource a number of services to and may disclose personal information to our contracted service suppliers (CSPs) from time to time. Typically our CSPs may include:

- Software solution providers;

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- 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. Entities based in these locations may not be subject to the requirements of or offer the protections provided by the Privacy Act.

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, as set out in our [access policy](#).

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.

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.


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.

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](#). If you are unhappy with our response, you can also make complaints to the [Office of the Australian Information Commissioner](#) or to the [Industry Associations](#) of which we are a member.

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 an [Industry Association](#) (of which we are a member) or to the [Office of the Australian Information Commissioner](#).



Contact Us

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

Normal Hours: +61 7 3023 1000
During normal office hours which are 8:00am to 5:30pm Australian Eastern Standard Time, Monday to Friday.

Fax: +61 7 3221 5810

Email: privacy@davidsonwp.com

Post: The Privacy Officer
GPO Box 2572
Brisbane Qld 4001

Outside Normal Hours: +61 437 237 697
If you need to contact us about your personal or sensitive information urgently outside normal office hours you may contact our Privacy Officer.

When contacting us you have the option to either not identify yourself or to use a pseudonym. However, this will not apply if it is impracticable for us to communicate with you that way. We are required or authorised under Australian law (or a court or tribunal order) to only deal with individuals who have identified themselves.



Documents & Links

The below hyperlinks will take you away from this document and to third party websites including Davidson's website.

Credit Information

[Credit Information Policy](#)

Davidson's Privacy Collection Statement

[Australian Privacy Collection Statement](#)

Australian Privacy Principles

[Australian Privacy Principles Fact Sheet](#)

Privacy Act

[Australian Privacy Act 1988 \(Cth\)](#)

Australian 'Commonwealth Record' definition

[s.3 Archives Act 1983 which we reached via s.6\(1\) Privacy Act 1988 \(as amended\)](#)

Social Media and Online Privacy Information

[Australia's Office of the Australian Information Commissioner - Independent Australian Government agency.](#)

AOIC Privacy Complaints Website

[Australian Government: Office of the Australian Information Commissioner's](#)

Industry Associations

Member of [Recruitment, Consulting and Staffing Association \(RCSA\)](#)

Member of [Association of Professional Staffing Companies \(APSCo\)](#)

For further discussion, please contact:

Our Privacy Officers

Phone: 07 3023 1000

Email: privacy@davidsonwp.com