

Privacy Statement and Policy

Privacy Statement

W & P Reedy Pty Ltd. is covered by 10 National Privacy Principles, the NPPs, as set out in the Privacy Act 1988 (as amended by the Privacy Amendment (Private Sector) Act 2000).

To comply with our obligations under the NPPs we have a Privacy Policy, which sets out how we manage privacy in our organisation. You are welcome to receive more information about the Policy

PRIVACY AND CONFIDENTIALITY

As members of the recruitment industry we appreciate the importance of confidentiality. This part of the obligation remains unchanged by this Privacy Policy.

The Privacy Policy deals with your **additional** right to privacy and is independent of our contractual and ethical obligations.

Privacy Policy

(For the attention of individuals whose personal information may be collected by this organisation)

Purpose of the Policy

The W & P Reedy Pty Ltd. takes its obligations under the Privacy Act seriously and would like to take all reasonable steps in order to comply with the Act and protect the privacy of the personal information that we hold. This policy sets out how we intend to so.

The Policy applies to candidates who provide us with their personal information.

The personal information that the Organisation collects

W & P Reedy Pty Ltd. collects the following personal information:

- Your name
- Date of birth
- Address
- Occupation
- Career history
- Career plans
- References
- Results of aptitude and other tests
- Medical history
- Financial details
- Other – insert other information or opinions that may reasonably identify the person

Why we collect it?

W & P Reedy Pty Ltd. collects, uses and discloses the information in accordance with the *Collection Statement*.

Set out in as much detail as possible the purpose (identify the primary purpose/s and the related purpose/s) of collection.

Complaints

If you have any complaints about our privacy practices or wish to make a complaint about how your personal information is managed please contact The managing Director Lars Bryndum. Complaints will be handled under the W & P Reedy Pty Ltd.'s *Privacy Complaints Policy*.

Storage

We will take all reasonable steps to protect the security of the personal information that we hold. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

Contract

We **do not** contract out data storage or processing functions. If the W & P Reedy Pty Ltd. does contract out we take measures to protect the information by ensuring that the contracted out data storage or processing functions are protected by a similar privacy policy.

Collection Statement

Use and disclosure

Personal information is **collected for the purpose** of:

- assessing your suitability for a type of job
- assessing your suitability for a position
- processing payment
- we may also collect the information to an advertising campaign using a particular candidates image or details.
- assessing suitable equipment for your business
- direct mailing

W & P Reedy Pty Ltd. will **disclose** this information to:

- prospective employers
- our service providers (eg organisations that conduct screening and testing services to us)
- our insurer/s
- all other reasonable parties that will assist us to place you in appropriate employment
- Prospective customers.

Legal reasons why we collect the personal information

We collect the information in order to comply with our legal obligations.

What happens if you choose not to provide the information

You are not obliged to give us your personal information. However, if you choose not to provide the W & P Reedy Pty Ltd. with the personal *detail - eg name and address* we may not be able to provide you with the full range of our recruitment services. It will also restrict the list of potential employment target or positions within these organisations [*insert details as appropriate*]

Access

You can gain access to the personal information that W & P Reedy Pty Ltd. holds about you. If you wish to do so please refer to our *Access Policy* or contact Lars Bryndum.

Sources of information

Where possible, W & P Reedy Pty Ltd. will collect the information directly from the candidate. However, in some cases we may receive personal information from referees or people that have worked with or are working with the candidate. For example a colleague may express to us that the candidate could have potential in a position that we are recruiting for.

If the personal information about a candidate was collected not from the candidate but from another party, the Organisation must take reasonable steps to inform that individual of the Collection and provide the Organisation's Collection Statement.

Access Policy

This policy is directed to those individuals whose personal information is held by our organisation.

Purpose

The purpose of this Policy is to set out how W & P Reedy Pty Ltd. will provide access to your personal information. The Policy is part of our Privacy Policy and our desire to provide for, maintain and give effect to your right to privacy.

Overriding principles

At all times the conduct under this Policy will be governed by the following principles:

- All requests for access will be treated seriously
- All requests will be dealt with promptly
- All requests will be dealt with in a confidential manner
- Your request to access your personal information will not effect your existing obligations or effect the commercial arrangements between you and the W & P Reedy Pty Ltd..

Form of Access

W & P Reedy Pty Ltd. will provide access by allowing you to inspect, take notes of or receive copies or print outs of the personal information that the W & P Reedy Pty Ltd. holds about you.

You can make your request in writing.

To obtain access you will have to provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

When will Access be denied?

Access will be denied if:

- the request does not relate to the personal information of the person making the request;
- providing access would pose a serious and imminent threat to life or health of a person;
- providing access would create an unreasonable impact on the privacy of others;
- the request is frivolous and vexatious;
- the request relates to existing or anticipated legal proceedings
- providing access would prejudice negotiations with the individual making the request;
- access would be unlawful;
- denial of access is authorised or required by law;
- access would prejudice law enforcement activities;
- access discloses a '*commercially sensitive*' decision making process or information; or
- any other reason that is provided for in the National Privacy Principles (NPPs) set-out under the Privacy Act.

Where possible, W & P Reedy Pty Ltd. will favour providing access. It may do so by providing access to the appropriate parts of the record or by using an appropriate '*intermediary*'.

Where there is a dispute about the right or forms of access these will be dealt with in accordance with W & P Reedy Pty Ltd.'s *Grievance Policy*.

Time

We will take all reasonable steps to provide access **within 30 days** of your request. In cases where the request is not complicated or does not require access to a large volume of information, we will provide information **within 14 days**.

Costs and charges

W & P Reedy Pty Ltd. will impose the following charges:

- Photocopying – \$2.50 per page
- Delivery cost of information stored off-site – where information is stored off-site, the cost of obtaining access to the information \$ 50.00
- Access to electronic databases – \$ 25.00

Privacy Complaints: How we handle privacy complaints (for individual customers)

Introduction

W & P Reedy Pty Ltd. sees the importance of privacy to the organisation, its customers and other stakeholders. As such W & P Reedy Pty Ltd. committed to protecting the privacy of the personal information that we hold. This is part of our organisation's:

- (a) Legal obligations under the Privacy Act 1988
- (b) Ethical and business obligations
- (c) Service to you

W & P Reedy Pty Ltd. places high priority on effectively dealing with any complaints dealing about privacy that you may have.

Overriding principles

At all times the conduct under this policy will be governed by the following principles:

- (a) All complaints will be treated seriously
- (b) All complaints will be dealt with promptly
- (c) All complaints will be dealt with in a confidential manner
- (d) The privacy complaint will not effect your existing obligations or the commercial arrangements that exist between this organisation and you.

Who may complain under this policy?

If you have provided us with personal information you have a right to make a complaint, have it investigated and dealt with under this policy.

What is a privacy complaint?

A privacy complaint relates to any concern or dispute that you have with our privacy practices as it relates to **your** personal information. This could include matters such as:

- (a) How personal information is collected
- (b) How personal information is stored
- (c) How this information is used or disclosed
- (d) How access is provided.

What do I do if I have a complaint about privacy practices?

W & P Reedy Pty Ltd. resolves grievances at the local level if possible. If you have a complaint about privacy please contact your Account Manager and / or the CEO.

All complaints will be logged on a database/complaints register.

You may complain orally or in writing (*insert any other details*). Usually your contact with the organisation will be the proper person to discuss or resolve your complaint, however, if your privacy complaint is not resolved the matter will then be referred to the CEO.

Grievance procedure

The goal of this policy is to achieve an effective resolution of your complaint within a reasonable set timeframe [28 days or as soon as practicable].

Once the complaint has been made, the point of contact can then resolve the matter in a number of ways:

1. Request further information and investigation: Your initial contact may request further information from you. You should be prepared to give as many details as possible including details of any relevant dates and documentation. This will enable the contact to investigate the complaint and determine an appropriate and useful solution. All details provided will be kept confidential.

The complaint may be investigated. The organisation will try to do so within 72 hours or as soon as possible. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.

2. Discuss options: We will discuss options for resolution and if you have suggestions about how the matter might be resolved you should discuss these with your contact. The contact could also suggest other solutions or give examples of how the personal information can be revised or stored in a different way.
3. Refer to CEO: If your complaint is not resolved at the local level, it will be referred to the CEO. The CEO would be provided with the history and may discuss the complaint with the employees, or other parties that are involved.
4. Resolution: You will be informed of the outcome and the reasons for the decision. If this does not resolve the complaint, the matter will be referred to a mutually agreed intermediary.
5. If after the above steps have been followed you are still dissatisfied with the outcome you may refer the complaint to the federal Office of the Privacy Commissioner.

Follow-up of the complaint [optional]

Your contact at the organisation will contact you after approximately six weeks to ensure that you have no further concerns.

Records

The organisation will keep a record of your complaint and the outcome.

Anonymous complaints

W & P Reedy Pty Ltd. is unable to deal with anonymous complaints as we are unable to investigate properly and follow-up such complaints.

However, in the event that an anonymous complaint is received W & P Reedy Pty Ltd will note the issues raised and try and resolve them appropriately. For example, W & P Reedy Pty Ltd. may wish to conduct further training or provide assistance in a given area.

Information

For any further information about this policy please contact Lars Bryndum.