### PRIVACY POLICY

#### **Our Commitment to You**

Your security and privacy is important to us. We will ensure that we take all measures to protect the information of candidates, clients, suppliers, employers and candidates.

#### We will:

- Never pass on your details to a third party without your consent, except as noted in this Privacy Policy.
- Never store resume information on our website.
- Implement best practice measures for securely storing your information.
- Provide you with current warnings relating to relevant scams we are aware of.
- Respond in a timely manner to your enquiries.

# **Privacy Policy**

p2p Recruitment and its related entities (referred to as "us", "we" or "our") are committed to protecting the privacy of the personal information that we collect from you and complying with the Privacy Act 1988 (Cth) (the "Privacy Act"), including the Australian Privacy Principles (the "APPs").

This Privacy Policy details how we comply with our privacy obligations and how we manage the personal information you provide to us. By submitting personal information to us, you agree to our use of such information as described herein.

We note that under the Privacy Act the employee records exemption exempts employers from the Privacy Principles in relation to an act done, or practice engaged in if it directly relates to a current or former employment relationship between the employer and the individual and the employee record is held by the organisation and relates to the individual.

We reserve the right to make changes to this Privacy Policy from time to time and all personal information held by us will be governed by the most recent version of our Privacy Policy.

# What is personal information?

The Privacy Act 1988 (the Privacy Act) defines personal information as information or an opinion about an individual (whether true or not) whose identity is apparent, or can reasonably be ascertained, from the information or opinion. Personal information is any information that can be used to identify you. If the information you provide to

us identifies you or your identity can be reasonably ascertained from such information, it will be considered personal information and we will manage such information in accordance with the Privacy Act, APPs and this policy.

#### What sensitive information is

Sensitive information is a special category of personal information. It is information or an opinion about your:

- racial or ethnic origin;
- political opinion;
- membership of a political association or religious beliefs, affiliations or philosophical beliefs;
- membership of a professional or trade association or membership of a trade union;
- · sexual orientation or practices;
- criminal record;
- health (at any time), genetic or biometric
- expressed wishes about the future provision of health services.

It includes personal information collected to provide a health service. Sensitive information can, in most cases, only be disclosed with your consent. We do not actively seek to collect sensitive information unless it is necessary for our business purposes. If we do have to collect sensitive information, we will do so in accordance with the Australian Privacy Principles.

#### What kind of information do we collect?

We collect personal information in a variety of ways, including via the p2p Recruitment website, <a href="www.p2precruitment.com.au">www.p2precruitment.com.au</a> or p2p Recruitment Pharmacy APP (such as when users register, apply for employment or post jobs), when you respond to email questionnaires or when you provide personal information to us by other means, such as in person, over the phone, social media, WhatsApp, Viber or by email.

Personal information that we collect and hold usually falls into the following categories:

- Candidate Information submitted and obtained from the Candidate and other sources in connection with applications for work;
- Employer Information submitted and obtained from the Employer when posting jobs on p2p Recruitment APP, Website, via phone or email.
- Work performance information;
- Information about incidents in the workplace;
- Staff information:
- Business information:
- Information submitted and obtained in relation to absences from work due to leave, illness or other causes;

- Information obtained to assist in managing client and business relationships;
- Sensitive Information such as credit cards, drivers licence, passport, AHPRA registration, KAPS eligibility, English test results, visas, health information, criminal record, trade and professional memberships (including trade unions, industry membership) etc.

Some information that we collect may not be personal information. This may include aggregated information about how users use the p2p Recruitment website and the p2p Recruitment APP anonymous answers to surveys and other information that does not personally identify you. Information that is not personal information is not subject to the Privacy Act or the APPs and we can use such information for any purpose.

# Use of your personal and sensitive information

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);
- Payment for work completed on a temporary/contract assignment;
- Follow up with you to offer you work or ascertain your availability for work;
- 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;
- Any insurance claim or proposal that requires disclosure of your personal or sensitive information;
- Ensuring our internal business processes are running smoothly which may include quality assurance audits, quality and services evaluations, fulfilling legal requirements and conducting confidential systems maintenance and testing;
- To undertake directly or through agent criminal reference checking with relevant government agencies:
- To send you material about our company, job postings that fit your profile, or information to assist with your employment or association with p2p Recruitment (opt out/opt in available).

### **Providing information to third parties**

We may provide links to third-party web-sites as a service to our users. We cannot control and do not accept responsibility for the information collection practices of such third-parties. We encourage you to review and understand the privacy policies of the relevant third-parties before providing any information to them.

#### **Disclosures**

We may disclose your personal information for the purposes for which it is primarily held or for a related secondary purpose and in some cases we may only disclose information with your consent.

Your Personal and Sensitive Information may be Disclosed to:-

- Prospective, potential and actual employers and clients of p2p Recruitment;
- Your referees;
- Other members of p2p Recruitment;
- 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;
- Any government department or body (or their agents) to verify;
- Your work rights status;
- A designated, registered training provider in relation to training and personal development opportunities;
- Our contractors and suppliers e.g. Our I.T. contractors and database designers any person with a lawful entitlement to obtain the information.

We will not intentionally disclose (and will take commercially reasonable steps to prevent the accidental disclosure of) your personal information to third-parties, whether for such third parties' marketing purposes or otherwise, except when we believe we are under a lawful duty of care to do so.

### **Storage**

We will store a candidate's and employers personal or business information for a reasonable period of time necessary for us to provide services to the candidate and the employers. At any time, and at the candidate's or employers request, we will destroy the personal information of that candidate or employer. We will do this for any lawful request.

# **Security**

We have in place industry-standard technological and operational security in order to protect your personal information from misuse and unintended disclosure, alteration, or deletion. Only authorised personnel will be provided with access to personal information. These parties are required to treat this information as confidential, and in accordance with this Privacy Policy.

However, we cannot guarantee the complete security of data transmissions or communications over the internet. As such, you provide information to us over the internet at your own risk.

#### **Access**

Subject to some exceptions which are set out in the Australian Privacy Principles (Principle 12 – access to personal information), 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.

If you wish to exercise your rights of access and correction you may access and update some personal information, please contact our Privacy Officer.

# **Changes to our Privacy Policy**

If at any time our privacy policy changes, the updated details will always be available on our website for your perusal. If at any time you have a question or concern regarding p2p Recruitment and privacy, please contact us at <a href="mailto:adminsupport@p2precruitment.com.au">adminsupport@p2precruitment.com.au</a>
Your Consent

By using our website and APP, you consent to our privacy policy.

### **Feedback**

p2p Recruitment has several areas on our website where you can submit feedback. Any feedback that is submitted through this area becomes the property of p2p Recruitment. We may use this feedback, such as success stories or responses to surveys, for marketing purposes, or to contact you for further feedback on the website.

### **How to Contact Us**

If you wish to contact us about your personal or sensitive information please do so during normal office hours which are Monday to Friday 9:00am to 5.00pm (closed weekends and public holidays). If you have any inquiries or complaints in relation to the use of personal information please contact the Privacy Officer on the details below. Your complaint will be dealt with in a timely manner.

The Privacy Officer

Address: p2p Recruitment

57 Moss Road

Wakerley, Brisbane, QLD 4154

**Phone:** +(61) 411109077

Email: adminsupport@p2precruitment.com.au

General information about privacy may be found via <a href="https://www.privacy.gov.au">www.privacy.gov.au</a> and <a href="https://www.oaic.gov.au">www.oaic.gov.au</a>