

JACKSON RECRUITMENT SERVICES PTY LTD

OUR POLICY FOR HANDLING PERSONAL INFORMATION

We manage personal information as an [APP Entity](#) in accordance with the *Privacy Act 1988* and *Australian Privacy Principles*. You can request a copy of our full policy, or just read the parts that interest you by following the links in this document. Some links will take you to external sites. You can read our [Collection Notification](#) for candidates and Job Applicants [here](#).

We only collect information that is reasonably necessary for the proper performance of our activities or functions and activities. You can read about the [kinds of information](#) we collect [here](#).

You can read more about the [purposes](#) for which we collect personal information [here](#).

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.

We manage personal information according to our [usual information flow](#). There may sometimes be departures from our usual information flow.

If you have any questions please [get in touch with us](#) via our [website](#) or by the other means of contact below:

CONTACT DETAILS:

Level 5, 20 Bond Street
Sydney NSW 2000 Australia

Phone: (02) 9251 4555

Mobile: 0417 267 314

[Email: sharonj@jacksonrecruitment.com.au](mailto:sharonj@jacksonrecruitment.com.au)

APP ENTITY

We manage personal information, as an APP Entity, under the Australian Privacy Principles ([APPs](#)), which you can find on the OAIC's website.

Because we may be 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 [get in touch with us](#).

USUAL INFORMATION FLOW

When we collect your personal information:

- we check that it is reasonably necessary for our [functions or activities](#) as a recruitment & staffing firm, specialising in bespoke labour hire and placement services;
- 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](#). For more detail, see the section in this policy about [How your personal information is held](#).
- some information may be disclosed to [overseas recipients](#).
- 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](#), which you can find on the OAIC's website.) For more detail, see the section in this policy about [Access & Correction](#).
- we correct or attach associated statements to your personal information in accordance with APP:13 of the [APPs](#), which you can find on the OAIC's website.
- 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](#) as defined in s.3 Archives Act 1983.

KINDS OF INFORMATION THAT WE COLLECT AND HOLD

Personal information that we collect and hold is information that is reasonably necessary for the [purpose](#) of properly performing our [functions and activities](#) as a recruitment & staffing firm, specialising in bespoke labour hire and placement services.

Click on the links below to see how it differs depending on whether you are:

- a [Candidate](#)

- a [Client](#)
- a [Referee](#)

FOR CANDIDATES

The type of information that we typically collect and hold about Candidates 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.

You can read more in our [APP.5 Collection Notification](#).

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 may include information about:

- roles, reporting lines, inter-personal communication, and cultural fit requirements within your organisation;
- business, social, or personal interests about which we may be able to provide news and information;
- celebration milestones and dates, preferred social media contact channels, etc that you choose to share with us.

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 Candidates for particular jobs or particular types of work and includes:

- your name;
- your relationship with and knowledge and opinions of our Candidate as relevant to the reference we are seeking;
- other background and contextual information as relevant to the reference we are seeking.
- your contact details for follow up (if necessary);
- confirmation of your identity and authority to provide a reference (if necessary).

PURPOSE OF COLLECTION, USE & DISCLOSURE

We collect, use and disclose information that is reasonably necessary to properly perform our functions and activities as a recruitment & staffing firm, specialising in bespoke labour hire and placement services.

Click on the links below to see how those purposes might differ depending on whether you are:

- a [Candidate](#)
- 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 Recipients](#)

FOR CANDIDATES

We typically use personal information about Candidates to assess amenability to work offers and work availability; suitability for placements; or to manage the performance in work obtained through us. We also collect and use personal information necessary to meet compliance responsibilities.

We may disclose your personal information to

You can read more in our [APP.5 Collection Notification for Candidates & Job Applicants](#) under the heading, [Your personal information will be used in connection with...](#)

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 with your consent;
- statistical purposes and statutory compliance requirements.

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;
- candidate suitability assessment;
- recruitment functions;
- marketing services to you with your consent.

OUR POLICY ON DIRECT MARKETING

We may use your personal information to directly market our services, or the services of interstate agencies with whom we work cooperatively. You can see a list of the agencies with whom we work on our website under the heading [Working Interstate](#).

We do not obtain customer lists from third parties for marketing purposes.

You may choose not to consent to direct marketing from us simply by letting us know by text message, phone call, or email.

We aim to observe the requirements of anti-spam legislation and would provide an effective means for unsubscribing from any marketing that would be considered to be spam.

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 [Candidate](#)
- a [Client](#)
- a [Referee](#)

Candidates may also wish to read our policy on [Photos & Images](#).

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](#).

FOR CANDIDATES

Personal information will be collected from you directly when you fill out and submit one of our application forms.

Personal information is also collected when we receive:

- any references about you;

- results of inquiries that we might make of your former employers (including the verification of your past employment with former employers and reasons for leaving that are listed on your resume/CV), work colleagues, professional associations or registration body;
- results of any competency or medical tests;
- performance feedback (whether positive or negative);
- any complaint from or about you in the workplace;
- information about a workplace accident in which you were involved;
- information about any insurance investigation, litigation, registration or professional;
- information about any disciplinary matter, criminal matter, inquest or inquiry in which you were involved;
- you provide us with any additional information about you.

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](#), which you can find on the OAIC's website.

PHOTOS & IMAGES

We will not request that you supply photographs, scan photo ID, or capture and retain video image data of you if simply sighting photographs or proof of identity documents would be sufficient in the circumstances.

FOR CLIENTS

Personal information about you may be collected when you provide it to us for business or business-related social purposes.

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](#), which you can find on the OAIC's website and our Privacy Policy.

FOR REFEREES

Personal information about you may be collected when you provide it to us in the course of our checking Candidates' references with you, and when we are checking information that we obtain from you about Candidates;

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](#), which you can find on the OAIC's website and our Privacy Policy.

ELECTRONIC TRANSACTIONS

Sometimes, we may 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;
- make a written online enquiry or email us through our website;
- submit a resume by email;
- use web-based application and placement management apps to submit identification documents, receive job offers, undertake inductions, or upload time sheets etc.
- web-based applications that we frequently use include:
 - Job Adder
 - LinkedIn
 - Office 365 for emails
 - ZOOM for interviews
 - Xero for accounting
 - Google chrome
 - Applications for protection against lost or corrupted data due to ransomware, deletion, or other dangers.

Some apps might invite you to use your social media log-in details (e.g.; Facebook or Google log-in user names and passwords).

It is important that you understand that there are risks associated with use of the Internet and that you should take all appropriate steps to protect your personal information. It might help you to look at the OAIC's resource on [Social Media & Online Privacy](#), which is located on the OAIC's website.

You can contact us by [land line telephone or post](#) if you have concerns about making contact via the Internet.

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 stored locally and backed up off-site with protection against lost or corrupted data due to ransomware, deletion, or other dangers

Information may be held in hard copy, or electronic copy on computers and personal devices making use of local and cloud storage.

Data is usually stored for seven years unless there is a legal requirement for it to be culled earlier.

INFORMATION SECURITY

The following provides a general description of common features of our Information Security System.

We make sure our staff receive periodic training on privacy protections

- We establish password protections and protocols
- We keep operating systems, browsers and plugins up-to-date with patches and fixes
- We enable anti-virus protections to help guard against malware that steals credentials
- We cull information safely, including by shredding and secure disposal.

We may deploy other higher-level protections that we would not choose to disclose in case they might be compromised.

See also our policy on [Data Breach Notification & Response](#).

If you need to know more about our information security system, please [get in touch with us](#).

DATA BREACH NOTIFICATION & RESPONSE

In the event of a data breach, we would respond by measures appropriate to the nature and seriousness of the breach and the size and resources of our organisation taken in accordance with the [four steps](#) set out in the OAIC's data breach notification guidance and advice, which you can find published on its [website](#).

DISCLOSURES

We may disclose your personal information for any of the [purposes](#) for which it is primarily held, or for a lawful [related purpose](#) as described in this policy.

Disclosure will usually be:

- internally;
- to interstate agencies with whom we work cooperatively. You can see a list of the agencies with whom we work on our website under the heading [Working Interstate](#);
- to our Clients;
- to Referees for suitability and screening purposes;
- to our contracted service providers, insurers, professional advisors and others with a proper interest in receiving your personal information for a lawful [related purpose](#).

We may also disclose your personal information where we are under a legal duty to do so.

RELATED PURPOSE DISCLOSURES

We may 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 and SaaS 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.

OVERSEAS RECIPIENTS

Although our operations take place mostly in Australia, some of your personal information might be disclosed to overseas recipients in some circumstances.

Unless we need to conduct background screening with overseas based organisations, we are not likely to disclose your personal information to overseas recipients. For example, if you have worked with an overseas employer, we might need to disclose your name, identifying details and the type of work you are seeking to your previous

employer to the extent necessary to enable us to undertake suitable reference checking.

The countries in which the overseas recipient to whom you would be likely to disclose your personal information, in those circumstances are likely to be those where the organisation is based.

We cannot guarantee that any overseas 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 would need to seek your consent to disclosure.

ACCESS & CORRECTION

Subject to some exceptions set out in privacy laws, 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](#).

ACCESS POLICY

If you wish to obtain access to your personal information you should contact our Privacy Co-ordinator. You will need to be in a position to verify your identity.

Consistently with [guidance and advice](#) provided by the OAIC, we may impose a charge (provided it is not excessive) for retrieving and providing access to your personal information. Any such charge would be calculated having regard to:

- our staff costs in searching for, locating and retrieving the requested personal information, and deciding which personal information to provide to you;
- our staff costs in reproducing and sending the personal information;
- the costs of postage or materials involved in giving access
- the costs associated with using an intermediary – e.g., where access might be granted indirectly or to paraphrased information.

In determining the amount to charge, we would consider:

- our relationship with you;
- any known financial hardship factors;
- any known adverse consequences for you if you do not get access to the personal information.

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 [getting in touch with 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 can also find out information about our [Data Breach Notification & Response Procedures](#).

If we decline to correct information as you request, you may ask us to attach an associated statement to your personal information in accordance with APP:13 of the [APPs](#), which you can find on the OAIC's website.

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](#).

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, by [getting in touch with us](#).

You can also make complaints to the [Office of the Australian Information Commissioner](#) through the Commission's website and the means set out there.

Complaints may also be made to [RCSA](#), 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 grievance intervention involving members.

NOTE: The RCSA Code and grievance intervention rules do NOT constitute a recognised external dispute resolution scheme for the purposes of the APPs; but are primarily designed to ensure the good professional conduct of the Association's members.

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](#), or to the RCSA should you choose to do so.

PRIVACY COLLECTION NOTIFICATION FOR CANDIDATES AND JOB APPLICANTS (APP 5.1)

We will need to collect personal information about you, your work performance your work experience and qualifications, aptitude test results and other information in connection with your possible work placements. We typically collect personal information when you register with us or apply for a job through us, when we conduct candidate screening and assessment, and when we receive reports of your performance from employers with whom we have placed you.

WHO WILL BE COLLECTING YOUR PERSONAL AND SENSITIVE INFORMATION

Your personal information will be collected and held by JACKSON RECRUITMENT SERVICES PTY LIMITED ACN 056 688 683 of:

Level 5, 20 Bond Street
SYDNEY NSW 2000

Phone: (02) 9251 4555
Mobile: 0417 267 314
[Email: sharonj@jacksonrecruitment.com.au](mailto:sharonj@jacksonrecruitment.com.au)

Some of your personal information may be held on portable devices such as mobile phones, laptop computers or in diaries operated and held by our staff members, or in the Cloud when we are using cloud storage or computer services.

HOW TO CONTACT US

If you wish to contact us about your personal information you should contact us during normal office hours. You can also [get in touch with us](#) through our website.

PERSONAL INFORMATION ABOUT YOU THAT WE COLLECT FROM OTHERS

We collect personal information about you from other people including referees, previous employers, professional registration authorities, educational institutions, who may be in a position to provide us with information that we may use to assess your suitability to be placed in or continue in positions that you may be offered.

If we reasonably believe that your being in, or remaining in, a position might present a risk to your health and safety, or to that of others for whose health or safety we are responsible, we may collect relevant personal information (including health information) that will allow us to manage that risk.

We may also collect personal information about your work performance from employers with whom we have placed you. We would use the information to manage our post-placement obligations, including managing any candidate replacement guarantee which we might be required to honour.

LEGAL REQUIREMENTS FOR PERSONAL INFORMATION

Some laws such as taxation law, immigration law, laws regulating employment agencies, laws relating to national security, laws relating to professional or trade registration, labour hire licensing laws, and laws for the protection of certain classes of people (such as children or the elderly) may require that we collect certain types of information (including criminal history and evidence of your right to work) from you that is relevant to the position/s for which you may be applying. The following Australian laws require or authorise our collection of personal information from you:

- *Migration Act 1958 (C'th)* and *Migration Regulations 1994 (C'th)* – to check your right to work in Australia.

There may be cases where we have to collect and disclose certain types of personal information relevant to specific jobs. When requesting information of this type, we will tell you whether the supply of that information by you is mandatory or voluntary.

IF YOU DO NOT GIVE US ALL OR PART OF THE INFORMATION WE NEED...

- we may be limited in our ability to locate suitable work for you;
- we may be limited in our ability to place you in work;
- we might decline to represent you in your search for work or put you forward for particular positions.

YOUR PERSONAL INFORMATION WILL BE USED IN CONNECTION WITH...

- verification of your identity and right to work in Australia;
- our assessment of your suitability for registration with us;
- the necessary validation (including from appropriate third party sources) of your resume, c.v., nominated references, or stated qualifications, experience, training or abilities. Where we require third party validation, we will tell you how we propose to obtain it;
- your actual or possible work placement;
- your performance appraisals;
- any test or assessment (including medical tests and assessments) that you might be required to undergo;
- our assessment of your ongoing performance and prospects;
- our identification of your training needs;
- suggestions we may make to you, whilst you remain registered with us, for further training in connection with work of the type that you are seeking through us;
- any workplace rehabilitation in which you and we are involved;
- 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;
- any reference that we may give concerning your work;
- our statutory compliance obligations;
- payroll functions;

- determining what (if any) fees may be payable by our clients in respect of your actual or potential work placements;
- direct marketing of our services and ancillary services that we believe might be of interest and use to you in connection with your search for suitable work and career development.

YOUR PERSONAL INFORMATION MAY BE DISCLOSED TO...

- potential and actual employers and clients of JACKSON RECRUITMENT SERVICES PTY LTD;
- interstate agencies with whom we work cooperatively. You can see a list of the agencies with whom we work on our website under the heading [Working Interstate](#).
- referees;
- a person who seeks a reference about you;
- 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 payroll services providers, I.T. contractors, internet service suppliers and database designers, some of whom may be off shore;
- a parent, guardian, holder of an enduring power of attorney (or like authority) or next of kin whom we may contact in any case in which consent is required or notification is to be given and where it is not practicable to obtain it from or give it directly to you;
- any person with a lawful entitlement to obtain the information.

DISCLOSURE OF YOUR PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

Unless we need to conduct background screening with overseas based organisations, we are not likely to disclose your personal information to overseas recipients. For example, if you have worked with an overseas employer, we might need to disclose your name, identifying details and the type of work you are seeking to your previous employer to the extent necessary to enable us to undertake suitable reference checking.

The countries in which the overseas recipient to whom would be likely to disclose your personal information, in those circumstances are likely to be those where the organisation is based.

ACCESS & CORRECTION

Our [Privacy Policy](#) contains information about how you may [access](#) personal information that is held by us and seek [correction](#) of that information.

ELECTRONIC TRANSACTIONS.

We conduct transactions electronically as well as in hard copy and face to face. It is important that you understand that there are risks associated with the use of electronic technologies and the use of the internet and you should take all appropriate steps to protect your personal information. Please see our [Privacy Policy](#) for further information.