

Privacy Policy

Protection of your personal information is important to Veritas. The way in which Veritas ('we, us, our) collect, use, store and disclose personal information in accordance with our obligations under the Privacy Act, including those contained in the Australian Privacy Principles (**APP**) is set out below. This Privacy Policy also constitutes a collection statement for the purposes of the Privacy Act.

We only collect information that is reasonably necessary for the proper performance of our activities or functions and services.

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 as an APP Entity under the APPs.

We may at times be a contracted service provider to a range of Commonwealth, State and/or Territory government agencies. Consequently, in those circumstances it will be necessary for us to collect and manage personal information as an Agency under different privacy arrangements.

What Personal Information do we collect and why do we need it?

To provide you with our Services, we need to collect Personal Information. If any of the Personal Information you provide is incomplete or inaccurate, we may be unable to provide Services to you or the quality of those Services we provide may be compromised.

The nature of the relationship we have with you and the Services you require from us will determine the personal and other information we collect.

Accordingly:

- We determine that it is reasonably necessary for our functions or activities in respect of the Services being provided
- We attempt to cross-check the information that we collect from you with third parties
- We record and hold your information in our Systems. Some information may be disclosed to third party or overseas recipients
- We retrieve your information when we need to use or disclose it for our functions and activities as relevant to our Services
- Subject to some exceptions, we permit you to access your Personal Information in accordance with the APPs
- We correct or attach associated statements to your Personal Information in accordance with the APPs
- 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.

Personal Information may include:

- Contact and identity information (for example, your name, email address, telephone numbers and address or other information in a registration form)
- Personal Information (including Sensitive Information) which is provided to us in the course of Services by you or a third-party
- Bank details, credit card details and expiry dates
- Information contained in a CV (for example, your previous work history, performance appraisals, qualifications, information about incidents in the workplace, your health information, personal history,

- opinions from referees, information in relation to absences from work due to leave, illness or other causes and our assessment of you, immigration history including residency, immigration status and travel history, character disclosures including offences, disclosures and information relevant to meeting character requirements, health disclosures and information relevant to meeting health criteria) if you apply for a position with us or an organisation we represent or provide recruitment or placements services to
- Information from third parties including any references about you, psychometric or competency test results or any information about any insurance investigation, litigation, criminal matter, inquest or inquiry in which you are involved
- Financial information that allows us to pay you should you be engaged as an employee or contractor, including your Tax File Number, superannuation account details, bank account details and other ancillary information that is required to fulfil contractual, legislative, filing and reporting obligations (including the payment of salary and wages)
- Feedback that you may have provided or performance on a placement or suitability for a position.

How do we collect Personal Information?

We aim to collect Personal Information directly from you, for example, when you send us information (including additional information about you), during interviews and meetings with you, from email correspondence, from business cards and during telephone calls or electronically through our website.

However, we may also collect Personal Information about you when we:

- Receive or give any reference about you
- Receive results of enquiries that we might make of your former employers, work colleagues, professional associations or registration body
- Receive results of any competency or medical test or treatment
- Receive access to medical records or treatment records
- Receive performance feedback (whether positive or negative) from any person
- Receive any information about a workplace complaint or accident in which you are involved
- Receive any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved
- Receive results of enquiries that we might make of your employer or sponsor.

We may also collect Personal Information:

- From parties to whom we refer you (e.g., a medical professional or other expert)
- From credit reporting and fraud checking agencies
- From debt collection agencies if you default in a payment to us
- Through our website and by other electronic communication channels (e.g., when you send us an email or post a comment on one of our blogs)
- From your spouse, partner or dependants
- From third parties
- From publicly available sources of information (including but not limited to newspapers, journals, directories, the Internet and social media sites)
- From the Department of Home Affairs

- When we are permitted or required to do so by law (including the Privacy Act).

How do we use your Personal Information?

We use the Personal Information we collect, hold use and disclose for the purpose of providing our Services.

We may also use the Personal Information:

- To comply with our contractual and other legal obligations
- For insurance purposes
- For work placement operations and recruitment functions
- For statistical purposes and statutory compliance requirements
- For improving our client service, including customising our website in order to better suit your requirements
- For responding to enquiries or questions from you
- For training
- For risk management
- For client and business relationship management
- For payroll services
- Immigration support and providing assistance in relation to an application for a visa
- To confirm identity and authority to provide references
- For a candidate's suitability assessment
- Subject to you advising us otherwise (see Marketing below), to advise you of additional services or information which may be of interest to you
- Otherwise as permitted under the Privacy Act.

If you default in a payment to us, we may use your Personal Information to recover that debt.

Marketing

We do not provide your Personal Information to any other person for marketing purposes.

From time-to-time, we may use your Personal Information to provide you with information on any relevant industry developments, including sending you email alerts, job listings, details of and invitations to events, promotions and competitions, fundraising campaigns to participate in and to communicate any other relevant information. We do not, however, use Sensitive Information for this purpose.

If you no longer wish to receive these alerts, unsubscribe links are provided in every email that you receive. If at any time you do not wish to receive any additional material from us, contact our Privacy Officer and we will remove your details from our marketing database.

Anonymous dealings

You are not obliged to give us your Personal Information. If you would like to access any of our Services on an anonymous basis, please advise us in writing. If it is possible and lawful, we will take reasonable steps to comply with your request. However, if you choose not to provide us with some or all of your Personal Information, we may not be able to provide you with some part or all of our Services (or our assistance will be restricted at our discretion).

Disclosing Personal Information

Disclosure to third parties

We may disclose your Personal Information to third parties in certain circumstances including:

- If you agree to the disclosure
- When we use it for the purpose for which it was collected (e.g., to provide you with Services)
- Between our related entities
- The Department of Home Affairs or third-party agencies, your employer and its related entities or your sponsor
- Your spouse or partner
- In circumstances where you would reasonably expect information of that kind to be passed to a third-party
- Our contracted software solutions providers; IT contractors and database designers and Internet service suppliers; Legal and other professional advisors; Insurance brokers and underwriters
- Superannuation fund managers; Background checking and screening agents
- Where disclosure is required or permitted by law (including under the Privacy Act), by court order, or is required to investigate suspected fraud or other unlawful activity, or
- If disclosure will prevent or lessen a serious or imminent threat to someone's life or health.

Disclosing Personal Information off-shore

We do not store personal information on off-shore servers.

In some Services we may be required to disclose personal information off-shore, for example, where the Services have an international aspect.

If information has to be disclosed overseas, the overseas recipient may not be subject to privacy obligations or to any principles similar to the Australian Privacy Principles.

An overseas recipient may also be subject to a foreign law which could compel disclosure of personal information to a third-party, for example, an overseas government or regulatory authority.

Please note that disclosure where an overseas recipient handles the information in breach of the Australian Privacy Principles, you will not be able to seek redress under the Privacy Act, may not be able to seek redress in the overseas jurisdiction and we will not be accountable under the Privacy Act.

Considerations when you send Information to us electronically

If you send an email to us (including any emails addressed to us or a staff email the information in your email (including any Personal Information) may be retained on our systems in accordance with applicable email retention policies and procedures.

While we do all we reasonably can to protect your Personal Information from misuse, loss, unauthorised access, modification or disclosure, including investing in security software, no data transfer over the Internet is 100% secure.

If you access another website from our website, you do so and provide personal information in accordance with the terms and conditions under which the provider of that website operates.

The open nature of the Internet is such that information exchanged via the internet may be accessed and used by people other than those for whom the data is intended. If you send us any information,

including (without limitation) Personal Information, is sent through the Internet or other electronic means at your own risk.

While we are not in a position to give you advice on internet security, if you provide Personal Information to us electronically, there are some things you can do which may help maintain the privacy of your information, including:

- Always closing your browser when you have finished your session, and
- Never providing Personal Information when using a public computer.

You should contact us immediately if you believe:

- Someone has gained access to Personal Information you have provided to us
- We have breached our privacy obligations or your privacy rights in any way, or
- You would like to discuss any issues about our privacy policy.

How we act to protect and retain your Personal Information

We endeavour to keep our information systems and files secured from unauthorised access. Those who work with us are aware of the legal obligations in respect to confidentiality and the importance we place on protecting your privacy.

Our procedures to securely store Personal Information include electronic and physical security measures, staff training and use of password protection software.

We retain our files for at least seven years. However, information filed in our electronic files may be retained indefinitely.

Personal Information may also be retained if we consider it necessary to do so or to comply with any applicable law or our insurance, governance obligations in our IT back-up records, for the collection of any monies owed and to resolve disputes.

How you can update or correct your Personal Information

You may request access to your Personal Information or correct any inaccurate or out of date information by contacting our Privacy Officer using the details below.

For security purposes, before we provide you with personal information, we may ask you to provide evidence of your identity.

You may request the source of any information we collect from a third party. We will provide this at no cost, unless under the Privacy Act or other law there is a reason for this information being withheld.

If there is a reason under the Privacy Act or other law for us not to provide you with information, we will give you a written notice of refusal setting out the reasons for the refusal except to the extent it would be unreasonable to do so and the mechanisms available to you to complain about the refusal.

How to complain if you believe we have breached the APP

If you believe that we have dealt with your personal information in a way that is inconsistent with the APP, you should contact our Privacy Officer in the first instance using the details below.

We will attempt to respond to your complaint within 30 days.

If we are unable to resolve your complaint you may contact the Office of the Australian Information Commissioner (contact details are below).

Changes to this Privacy Policy

This is our current Privacy Policy. Our Privacy Policy will be updated periodically, with the updated version posted on our [website](#).

Contact details

If you would like further information on our Privacy Policy or if you have any concerns over the protection of the information you have given to us or that we have collected from others, please contact our Privacy Officer at admin@adjusting.com.au.

More information about your rights and our obligations in respect to privacy and information on making a privacy complaint are available from the Office of the Australian Information Commissioner at:

Website: www.oaic.gov.au

Post: GPO Box 5218 Sydney NSW 2001

Email: enquiries@oaic.gov.au

Definitions

In this Privacy Policy:

- "Personal Information" has the meaning given under the Privacy Act but, in short, means information or an opinion relating to an individual that can be used to identify that individual.
- "Privacy Act" means the *Privacy Act 1988 (Cth)* including the Australian Privacy Principles ("APP") (as amended from time-to-time).
- "Sensitive Information" has the same meaning as under the Privacy Act.
- "Services" means the services provided by the relevant separate and independent Veritas business that it provides.
- "Website" means www.adjusting.com.au and other websites and forms of social media we manage where you post comments or we interact with you.

The meaning of any general language is not restricted by any accompanying example and the words 'includes', 'including', 'such as', 'for example' or similar words are not words of limitation.