



Sarina Russo Recruitment Privacy Policy

Version: 3.6

Department: Quality Assurance

Last Amended Date: 25 August 2021

Sarina Russo Recruitment is committed to protecting the privacy of your *personal information* and/or *sensitive information* as defined under the *Privacy Act 1988* ("**Your Information**"). This policy sets out the way we handle Your Information including the collection, use, disclosure and storage of Your Information, as well as your right to access Your Information. All information has been collected by Sarina Russo Recruitment in accordance with the Australian Privacy Principles and will only be disclosed in accordance with these Principles.

This policy only applies to Sarina Russo Recruitment's databases and files and does not cover any State, Territory or Commonwealth Government-owned database or files. You are advised to contact the relevant government agency for a copy of their privacy policy.

If we change this Privacy Policy, we will post the changes on our website so you may be aware of the information we collect and how we use it. Accordingly, you are reminded to check our website for further details.

Your Information

We only collect Your Information when it is reasonably necessary for our functions and activities in providing recruitment and associated employment services. We may collect information about you in a number of circumstances and the information we collect will depend on the services we are providing to you; for example whether we are assisting you to find employment, assisting you to complete your resume, complete relevant training or otherwise market you to potential employers for placement.

In order to provide you recruitment and associated employment services, we may need to collect Your Information such as name, postal address, email address, telephone number, work and education history, qualifications, career details or other information generally contained in a resume and other information reasonably necessary to conduct these services. In some circumstances, with your permission, it may include health information.

Collection

Where practicable Sarina Russo Recruitment will endeavour to collect Your Information directly from you. In order to provide you with recruitment and associated employment services we will need to collect Your Information from you such as:

- Your name
- Your contact details
- Identification information
- Your passport details
- Your qualifications
- Your previous employment history

Your Information will also be collected when:

- We receive any reference about you
- We receive any results of enquiries that we might make of your former employers, work colleagues, professional associations or registration body
- We receive the results of any competency or medical test
- We receive performance feedback (whether positive or negative)
- We receive any complaint from or about you in the workplace
- We receive any information about a workplace accident in which you are involved
- We receive any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or enquiry in which you are involved
- You provide us with any additional information about you

At, or as soon as practicable after, Sarina Russo Recruitment collects Your Information we will take reasonable steps to ensure you are made aware of:

- Sarina Russo Recruitment's identity and how you can contact us;
- Your rights with regard to accessing Your Information;
- The purpose for which Your Information was collected;
- To whom we usually disclose Your Information;

- Our requirement to collect particular or further information to comply with law or our Government contractual obligations; and
- The main consequences, if any, for you if you do not provide all or part of the information we require.

If we receive unsolicited information we will determine if we could have collected this information had we solicited it ourselves. If we determined we could not, and the information is not in a Commonwealth record, we will destroy or de-identify the information.

Sarina Russo Recruitment will only collect Your Information by lawful and fair means.

Use and Disclosure

We will use our best efforts to ensure Your Information remains private and is used only for the purposes you agree to.

Sarina Russo Recruitment will not reveal, disclose, sell, distribute, rent, licence, share or pass Your Information to a third party, other than those that we have a binding agreement with ensuring that the third party affords Your Information similar levels of protection as we do.

In order to provide you with recruitment and associated employment services, we may need to disclose Your Information to third parties such as:

- Potential and actual employers and clients of Sarina Russo Recruitment
- Referees
- Other members of Sarina Russo Recruitment
- Our insurers
- A professional association or registration body that has a proper interest in the disclosure of Your Information
- The Department of Home Affairs and Department of Foreign Affairs and Trade (Australian Government)
- A Workers Compensation body
- Related entities of Sarina Russo Job Access (Australia) Pty Ltd trading as Sarina Russo Recruitment.
- Our contractors and suppliers – e.g. our I.T. contractors and database designers
- Any person with a lawful entitlement to obtain the information
- Prospective employers in the course of seeking to refer you for suitable employment opportunities

Your Information may be used in connection with:

- Your actual or possible work placement
- 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 enquiry in which you are involved
- Any insurance claim or proposal that requires disclosure of your personal or sensitive information

Further, we may use and disclose Your Information to provide you with recruitment and associated employment services specific to you at point of collection or for another purpose if:

- You would reasonably expect us to disclose it for that purpose;
- That purpose is directly related to the purpose specified to you at the time of collection.
- Sarina Russo Recruitment reasonably believes the use is necessary to lessen or prevent a serious threat to an individual's life, health or safety or to public health or safety and it is unreasonable or impractical to obtain your consent;
- Sarina Russo Recruitment has reason to suspect that unlawful activity has been, or is being engaged in, and uses the information as part of its investigation, or in reporting its concerns to the relevant authority;
- The use and disclosure is specifically authorised by law; or
- Any other exceptions provided in the Privacy Act 1988.

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Sarina Russo Recruitment does not disclose Your Information to unrelated third parties for the purposes of direct marketing unrelated products or services.

Data Quality

Sarina Russo Recruitment will take reasonable steps to ensure that Your Information is accurate, up-to-date, complete and relevant. You are encouraged to help us keep Your Information accurate, complete and up-to-date by contacting your consultant or this organisation and inform us of any changes to your details. You can contact us on 07 3234 2500.

Data Security

At Sarina Russo Recruitment we are committed to protecting the privacy of Your Information. We take reasonable steps to protect Your Information from misuse, loss, interference and from unauthorised access, modification or disclosure. We ensure this by having such security measures as:

- Individual password access to systems and databases
- Secure data storage

All staff confirm their acceptance of the Electronic Use and Security Policy.

We will also take reasonable steps to destroy or permanently de-identify Your Information if it is no longer required for any purpose unless it is contained in a Commonwealth record or required by law or contractual requirement.

Access and Correction

You will be provided the opportunity to access Your Information and correct that information if you determine it is incorrect. Sarina Russo Recruitment will allow any person on whom records are maintained to have access to those records unless Government contractual requirements or legislation (e.g. Freedom of Information Act) requires or authorises the refusal of access. To obtain access to Your Information please make a request to your closest Sarina Russo Recruitment office. Before giving access to information, Sarina Russo Recruitment will require that you provide proof of identification and this along with details of your request will be recorded on your file.

Anonymity and Pseudonymity

Whenever it is lawful or practicable, you will have an option of not identifying yourself when dealing with Sarina Russo Recruitment. However, due to the nature of the services being provided to you this will be very limited cases.

Sensitive Information

Sarina Russo Recruitment will not collect *sensitive information* revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership or details of health, disability or sexual activity or orientation unless:

- Your consent has been obtained and the information is reasonably necessary to provide you with employment and related services; or
- The collection is required or authorised by law; or
- The collection is necessary to prevent or lessen a serious threat to the life, health or safety of any individual, or to public health or safety and it is unreasonable or impractical to obtain your consent; or
- Sarina Russo Recruitment has reason to suspect that unlawful activity, or misconduct of a serious nature, relating to our functions/activities has been, or is being engaged in and we believe this collection is necessary for us to take action in relation to this matter; or
- Any other exceptions provided in the Privacy Act 1988.

Resolving Privacy Concerns

You are able to raise any concerns you may have regarding Your Information handling practices by detailing your concerns with the Legal Counsel or Privacy Co-ordinator at Sarina Russo Group Head Office through privacy@sarinarusso.com.au.



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Storing and Transferring information about you abroad

Your Information may be housed in an offshore data management system. We will endeavour to ensure a level of data protection at least as protective as that required in Australia and where possible we have contracted with our cloud storage providers to uphold these standards.

The Internet and Your Privacy

Sarina Russo Recruitment uses the World Wide Web in order to assist you in providing recruitment and associated employment services.

Sarina Russo Recruitment takes all reasonable steps to protect your security when using our website, but you should be aware that no transmission of information to and from a website is ever totally secure, particularly from malicious attack. Accordingly, transmission is at your own risk.

It is important to remember that if you are using a computer in a public place, such as a library or community centre, you must remember to log-off, otherwise others may be able to access Your Information.

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