

amge (AM Group Executive Pty Ltd) Privacy Policy

1. INTRODUCTION

At AM Group Executive Pty Ltd (“we”, “our”, “us”, or “amge”), your right to privacy is important. AM Group Executive is subject to the Australian Privacy Principles (“APPs”) under the Privacy Act 1988 (Cth) (“Privacy Act”). We manage personal information in accordance with the Privacy Act 1988 (Cth) (“Privacy Act”) and the Australian Privacy Principles (“APPs”). 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.

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.

1.1. APP Entity

AM Group Executive manages personal information, as an APP Entity under the APPs.

Because we are 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 contact us.

1.2. Information Flows

When we collect your personal information:

- we check that it is reasonably necessary for our functions or activities as a professional recruitment services provider;
- 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 . 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.
- we correct or attach associated statements to your personal information in accordance with APP:13 of 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.

2. TYPES OF INFORMATION THAT WE COLLECT AND HOLD

Personal information that we collect and hold is information that is reasonably necessary for the proper performance of our functions and activities as a recruitment services provider and is likely to differ depending on whether you are:

- a Candidate
- a Client
- a Referee.

2.1. 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 and includes:

- Contact and identity information (such as your contact details and other information you may provide in your registration form)
- For recruitment purposes: 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 as a prospective candidate for recruitment.
- 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 AM Group Executive 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).

2.1.1. Sensitive information

Depending on the nature of the role applied for, we may need to collect and process personal information about you, including health and disability details; criminal records or membership of professional or trade associations.

We will only disclose your sensitive information (for example, your health information) for the purposes for which it was initially collected or purposes to which you otherwise consent.

2.2. 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 and includes:

Contact and identity information (such as your contact details and other information you may provide)

Feedback that you may have provided in relation to a Candidate, or their performance on placement.

2.3. 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:

Contact and identity information (such as your contact details and other information you may provide)

Feedback that you may have provided in relation to a Candidate or their suitability for a position.

3. PURPOSES

The purposes for which we collect, hold, use and disclose your personal information are likely to differ depending on whether you are:

- a Candidate;
- a Client;
- a Referee.

3.1. For Candidates

Information that we collect, hold, use and disclose about Candidates is typically used for:

- work placement operations;
- recruitment functions;
- statistical purposes and statutory compliance requirements;
- marketing services to you;
- informing you about any relevant industry developments, including sending you details of any events, promotions and competitions, and to communicate any other relevant information
- improving our customer service, including customising the AM Group Executive' website in order to better suit your requirements;
- responding to enquiries or questions from you;
- training;
- risk management.

3.2. For Clients

Personal information that we collect, hold, use and disclose about Clients is typically used for:

- client and business relationship management;
- recruitment functions;
- payroll services;
- marketing services to you;
- statistical purposes and statutory compliance requirements;
- responding to enquiries or questions from you.

3.3. 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;
- a Candidate's suitability assessment;
- recruitment functions.

4. 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

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.

4.1. For Candidates

Personal information will be collected from you directly when you fill out and submit one of our application forms or any other information in connection with your application to us for work.

Personal information is also collected when:

- when we have a face to face meeting or telephone conversation with you;
- you send or receive an email from us;
- we receive or give any reference about you;
- we receive results of enquiries that we might make of your former employers, work colleagues,
- professional associations or registration body;
- we receive results of any competency or medical test;
- we receive performance feedback (whether positive or negative);
- we receive any information about a workplace complaint or accident in which you are involved;
- we receive any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved;
- you provide us with any additional information about you.
- electronically through our website.

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 and our Privacy Policy.

4.2. 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 and our Privacy Policy.

4.3. 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 and our Privacy Policy.

4.4. Dealing with us anonymously

Candidates are not obliged to give us their personal information. If you would like to access any of our services on an anonymous basis, please let us know in writing. If this 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:

- (a) not be able to provide a candidate with the full range of our recruitment services.
- (b) be more restricted in providing a particular candidate with a list of potential employment targets or positions; and
- (c) decline to provide any further assistance to the Candidate.

Additionally, the candidate's chances of being properly considered for a position may be reduced.

4.5. Photos & Images

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

At time video surveillance which operates in or near our premises may capture images of you.

4.6. Electronic Transactions

Sometimes, we 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;
- register as a site user to access facilities on our website such as a job notification board;
- make a written online enquiry or email us through our website;
- submit a resume by email or through our website;

It is important that you understand that there are risks associated with use of the Internet and you should take all appropriate steps to protect your personal information.

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

4.6.1. Email Alerts

You may sign up to receive emails that alert you to new jobs on our website or upcoming events. To subscribe to these, you need to provide your email address, which will be used for the purposes of keeping you informed by email of the latest jobs and/or news in your nominated industry. If you no longer wish to receive these alerts, unsubscribe links are provided in every email that you receive.

4.6.2. Our Website

Whenever a registered member (such as a candidate) logs in to our websites, they will be identified by their user name and password. The information we collect about members' use of our websites is in aggregate form (that is, the information does not identify any one individual). This information is used by us to measure site performance, assist in resolving any technical difficulties) and to improve our online services. We may also publish some of this aggregate (non-identifiable) information on the AM Group Executive websites worldwide.

4.6.3. Cookies

Cookies may be used on some areas of our websites. Cookies are small amounts of information which AM Group Executive stores on your computer. Unless you have indicated your objection when disclosing your details to AM Group Executive, our system will issue cookies to your computer when you log on to the AM Group Executive' website. Cookies make it easier for you to log on to and use the website during future visits. They also allow us to monitor website traffic and to personalise the content of the website for you.

Most browsers allow you to turn off cookies. If you want to know how to do this, please look at the help menu on your browser although, in that case, it may restrict your use of the AM Group Executive website. If you do not wish to receive cookies in the future, please let us know. Find out more about the use of cookies on <http://www.allaboutcookies.org/>

4.6.4. Other Websites

Clicking on links and banner advertisements and RSS feeds may result in your transfer to another website, where data privacy practices may be different to that of AM Group Executive. It is your responsibility to familiarise yourself with these privacy policies as we accept no responsibility for and has no control over them or any information or data collected by or for them.

A link to a third party website is not an express or implied endorsement, promotion or warranty of the products or services offered by or accessible through that site or advertised on that site.

5. 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.

5.1. Our Information Record System

Your personal information may be stored in hard copy documents, or electronically on AM Group Executive' software or systems.

5.2. Information Security

AM Group Executive takes reasonable steps to protect the personal information we hold from loss, interference, loss, unauthorised access, modification or disclosure. Our security procedures include:

- locks and security systems;
- computer pass words and limited access to shared network drives to authorised staff;
- virus checking;
- auditing procedures and data integrity checks;
- recording of file movements; and
- security classification to identify information needing special protection.

The Internet is not always a secure method of transmitting information. While we seek to protect your personal information by implementing digital security systems in various parts of our website, AM Group Executive does not accept responsibility for the security of information you send to us or receive from us over the Internet or for any unauthorised access or use of that information.

6. DISCLOSURES

We may disclose your personal information for any of the purposes for which it is primarily held or for a lawful related purpose.

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

Disclosure will usually be:

- internally and to our related entities
- to our Clients
- other recruitment companies or intermediaries involved in managing the supply of personnel
- to Referees for suitability and screening purposes.

6.1. Related Purpose Disclosures

We 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 solutions 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.

6.2. Do we send your information overseas?

AM Group Executive is a global professional recruitment consultancy aiming to provide you with the same services worldwide. Our global network is made up of offices, data centres, trusted service providers and trained recruitment consultants.

Some of your personal information is likely to be disclosed to overseas recipients. Where we transfer your personal information to related entities outside Australia, we believe that the recipients of such information are subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are similar in all material respects to the APPs outlined in the Privacy Act.

We may transfer the information we collect about you to countries other than your home country or other than the country in which the information was originally collected:

- (a) if you are registered as a Candidate on our database, your personal information will be accessible by our other offices and potential employers internationally, including Laos, Thailand, Vietnam, Singapore, Hong Kong, Canada and United States.
- (b) to different parts of the AM Group Executive Group located outside Australia to enable the development and marketing of other products and services and to improve our customer service and make our services more valuable to you.
- (c) to servers located in Canada and United States, in which case we will take reasonable steps to ensure your personal information is treated securely.

7. YOUR ACCEPTANCE OF OUR PRIVACY POLICY

By submitting your personal information to AM Group Executive through any means, using our services or accessing the AM Group Executive website, you consent to the use of information as set out in this policy. If you do not agree with any term of this policy, please do not submit any personal information to us or use AM Group Executive' services or our website.

AM Group Executive operates in a dynamic business environment. Aspects of our business may change as we respond to changing law or market conditions. This may require our policies to be reviewed and revised from time to time. If we make material changes to our Privacy Policy, we will notify you by putting a notice on the "Home" page of our website at www.robertwalters.com.au.

Any information we hold will be governed by the most current version of our privacy policy. Your continued use of our website, services or continued provision of personal information to us once you have been notified of the updated Privacy Policy constitutes your deemed acceptance of the revised Privacy Policy.

8. ACCESS & CORRECTION

Subject to some exceptions set out in privacy law, 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.

8.1. 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.

It may take us a little time to process your application for access as we may need to retrieve information from storage and review information in order to determine what information may be provided. We will generally respond to your request for access within 20 working days.

Where we are legally permitted to do so, we may refuse your request. If AM Group Executive does deny your request for access, we will provide you with reasons for the refusal.

We may impose a moderate charge to cover the reasonable costs of retrieval and supply of the information to you. Our Privacy Officer will discuss this with you.

If you have a complaint about your access to personal information, please contact us.

8.2. Correction Policy

AM Group Executive 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.

We may contact you from time to time to check that the information is still correct. Please advise your AM Group Executive' consultant when your personal details change.

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 contacting us. We will generally respond

to your request within 10 working days.

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.

If you request your personal information to be updated and there is a dispute about the facts, we will make a note on your personal information of such dispute.

Complaints

You have a right to complain about our handling of your personal information if you believe that we have interfered with your privacy.

8.3. 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 Officer.
- You can also make complaints to the Office of the Australian Information Commissioner.

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 .

HOW TO CONTACT US

AM Group Executive is committed to working with you to obtain a fair resolution of any complaint or concern about your privacy.

If you would like more information about our privacy practices or have any concerns or questions in relation this Privacy Policy, please contact our Privacy Officer by:

Writing to us at:

Andrew Medard – Director & Privacy Officer

AM Group Executive Pty Ltd
Suite 403, 454 Collins St
Melbourne VIC, Australia

Emailing us at:

melbourne@amge.com.au

Calling us on:

+61 3 8319 4033