

# *Recruitment Privacy Policy*

*The privacy of personal information is afforded the highest level of importance by MACG.*

*MACG upholds the principles of the Privacy Act 1988 (Cth) ("Act") and the Australian Privacy Principles (APPs) regarding the manner in which we handle your personal information and how we respond to your requests to access and correct it. While we take careful measures to protect the confidentiality of information provided to us, we have adopted this Privacy Policy to reflect the intentions of the Act. This document sets out our information handling procedures and the rights and obligations that both you and we have in relation to your personal information. We will uphold all relevant legislative requirements. However, in the event of any inconsistency, the legislative requirements will override the provisions of this document.*

*This document reflects our Privacy Policy as at 18-Oct-2022. We reserve the right to amend our Privacy Policy at any time without notice to you. If this Privacy Policy changes, the changes will be posted on the MACG website.*

## **Collection of Information**

### Personal Information

*We will only collect personal information where it is reasonably necessary to do so for the conduct of our business. We generally collect your personal information through your submissions on our website or recruitment platform.*

*The kinds of personal information that we collect, and hold may include:*

- your name, birth date and gender.*
- your contact information, including postal and residential addresses, telephone and facsimile numbers, and email addresses.*
- questions specific to the requirements of the employer.*
- your education;*
- your employment history;*
- passport and visa details;*
- academic records, transcripts, enrolment and assessment details.*
- submitted video recordings.*

*Any collection of personal information by us will be fair and lawful and will not be intrusive.*

### Sensitive information

*MACG will only solicit and collect sensitive information if:*

- it is required to do so by law; or*

- it has the consent of the individual to whom the information relates, and it is reasonably necessary for MACG to collect the sensitive information to enable it to carry out a relevant function or activity.

MACG will only collect sensitive information where the information is necessary for a relevant function or activity. Examples of a relevant function or activity include (are but not limited to):

- to determine whether an individual is permitted to work in Australia, having regard to Visa requirements; or

- qualification for particular employment/recruitment programs, financial or other assistance which may be allocated by reference to matters which constitute sensitive information, such as cultural background.

MACG may also collect sensitive information about an individual in order to comply with our obligations under Australian law, including but not limited to:

- language or cultural background;
- citizenship status;
- status as an Indigenous Australian;
- disability status; and
- health information.

We may also collect and hold information about you that is not personal information, including:

- data relating to your activity on the recruitment platform via tracking technologies such as cookies; and

- the identity of your Internet browser, the type of operating system you use, your IP address and the domain name of your Internet service provider.

We may use this information for internal purposes, including administering our services, diagnosing problems, generating statistics and trends, and improving the quality of our products and services. We may also use this information to identify any submissions you make and to assess your engagement with us.

MACG will generally collect your personal information from you directly, unless:

- you consent to the collection of the information from someone else; or
- MACG is required or authorised by law to collect the personal information from a third party; or
- it is unreasonable or impracticable to obtain the personal information from you directly.

If it is reasonable and practical to do so, we will only collect personal information from the individual to whom the information relates. However, you authorise us to collect information from

*external sources including government agencies and other third parties such as advertisers, mailing lists, recruitment agencies, contractors and business partners as and when required.*

*If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information. We will not, however, make any such request to any third party in circumstances where it would not be practical to do so.*

## **Use of Personal Information**

### General

*MACG recruitment platform collects and uses your personal information on the lawful basis that it:*

- Is pursuing its legitimate interests. This includes:*
  - \* communicate with you in respect of news and information about our products and services;*
  - \* provide Job Advertisers with the services and/or products which we have undertaken to provide them with under contract;*
  - \* collate your contact details*
  - \* facilitate communication and engagement between you and Job Advertisers who utilise our services as part of their recruitment processes;;*
  - \* facilitate future employment opportunities in the event your initial employment application is unsuccessful;*
  - \* operate and maintain its information technology systems;*
  - \* improve the functionality of its website;*
  - \* personalise your experience with our products and services, for example, via connectivity with social media services;*
  - \* enable third party organisations to provide us with technical and support services;*
  - \* obtain legal, financial, business and other professional advice in respect of its operations;*
  - \* to carry out statistical analysis and internal research in respect of its customer base, products and services; and*
- Is complying with its legal obligations. This includes*
  - \* the Corporations Act 2001 (Cth) which requires the disclosure of your personal information to third parties in certain circumstances*
- is necessary to protect your vital interests. This includes:*

- \* *Releasing sensitive personal information where MACG considers that there is an imminent threat to your health, safety or life generally, or where it considers that it is necessary to avoid, lessen or prevent a serious emergency or crime.*

### ***Disclosure of personal information***

*The primary purpose for using or disclosing an individual's personal information will include:*

- to identify an individual and verify their identity;*
- to provide MACG services to an individual and Job Advertiser;*
- to do any of the things listed in the section of this Privacy Statement entitled "Use of Personal Information"; and*
- to communicate with an individual.*

*Some recruitment platform employees and contractors will have access to your personal information to a level that is necessary to enable them to perform their roles within the platform. They are obliged to respect the confidentiality of any personal information held by MACG and will take reasonable steps to ensure that personal information is not disclosed to a third-party, except in certain permitted situations. These include:*

- where MACG obtains your consent;*
- where it is necessary to provide that information to a third-party who provides services to MACG;*
- where the disclosure is required or authorised by law or regulatory obligations; or*
- any other circumstance permitted by the APPs.*

*Any disclosure that is required to be made to any third party will be made primarily for the purpose of providing or offering goods and services to you. If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.*

*Any personal information submitted via our online form may need to be processed by a third party.*

*By submitting personal information via an online form on the recruitment platform, you consent to the disclosure of that information to a third party, which may be located overseas, for the sole purpose of processing the online form. For the avoidance of doubt, third parties in Australia to whom your personal information might be disclosed include:*

- Job Advertisers registered with us, but only those Job Advertisers with whom you have lodged an employment application either contemporaneously or in the past;*
- contracted service providers including:*

- \* *information technology service providers, including cloud service providers;*
- \* *external business advisors, including accountants, auditors and lawyers;*

*Third parties outside of Australia to whom your personal information might be disclosed include:*

- \* *information technology service providers, including cloud service providers;*
- \* *third party service providers;*

### **Storage and Security of Personal Information**

*The individual providing the personal information to MACG must also ensure that the personal information is both relevant and accurate.*

*We will generally hold your personal information as either physical records, records on our servers.*

*We will, wherever possible, keep all personal information strictly confidential.*

*We will take reasonable steps to protect of the personal information it holds, in both hard copy and electronic form, from:*

- *misuse, interference and loss; and/or*
- *unauthorised access, modification or disclosure.*

*For example, MACg has in place:*

- *data is encrypted in transit and at rest.*
- *your personal data is accessible only to registered employees and contractors of the employer via password protected logins.*

*MACG has in place systems to manage all personal information so that it can destroy or permanently de-identify personal information, wherever reasonable and practicable, that is no longer needed for any reason.*

*Generally, subject to your right to erasure, personal information retained by MACG will be stored for as long as MACG requires it to:*

- *fulfil our obligations under law;*
  - *discharge our contractual obligations;*
  - *carry out the purpose for which the personal information was collected; and/or*
  - *otherwise facilitate the reasonable conduct of our business operations*
- following which time it will be either destroyed or anonymised.*

### **Data Breaches**

*MACG will manage all data breaches in accordance with the mandatory Notifiable Data Breaches Scheme (NDB Scheme) in Australia*

#### *Obligations under the NDB Scheme*

*In accordance with the NDB Scheme, in the event of a suspected data breach we will:*

- contain the breach and, if possible, take remedial action; and*
- commence the requisite assessment process to determine whether the data breach is likely to be an "eligible data breach" for the purposes of the NDB Scheme. An "eligible data breach" being one where:*
  - \* there is unauthorised access to, unauthorised disclosure of, or loss of, personal information held by it;*
  - \* the access, disclosure or loss is likely to result in "serious harm" to any of the individuals to whom the information relates. In this context, "serious harm" refers to serious physical, psychological, emotional, financial or reputational harm to an individual or individuals; and*
  - \* MACG has not been able to prevent the likely risk of serious harm with remedial action.*

*If MACG has reasonable grounds to believe that an "eligible data breach" has occurred, it will:*

- prepare a statement to the Office of the Australian Information Commissioner (OAIC) as soon as practicable (OAIC Statement);*
- notify the individual to whom the information relates as soon as practicable after the statement has been prepared; and*
- provide that individual with a copy of the OAIC Statement.*

*If MACG is unable to locate the individual to whom the eligible data breach relates for the purpose of providing them with a copy of the OAIC Statement, a copy of the OAIC Statement will be posted on our website.*

#### **Data Access & Correction**

*You may request access to your personal information at any time by sending a written request to our Privacy Officer at our support office.*

*You do not need to provide a reason for your request.*

*We will not impose a fee for making an access or correction request in the first instance. However, we may charge a small fee for administrative costs incurred by us in providing access to your personal information in those circumstances where the request is manifestly unfounded*

or excessive and requires a significant amount of time to locate or collect your information or to present it in an appropriate form. MACG will generally grant an individual access to their personal information unless an exception applies. Exceptions include where:

- giving access would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the request is manifestly unfounded or excessive (taking into account whether the request is repetitive in nature); or
- the access would be unlawful.

We will take reasonable steps to ensure that the personal information we collect about you is accurate, up-to-date and complete, and ensure that the personal information we use or disclose is accurate, up-to-date, complete and relevant. You are free to update your personal information at any time by sending a written request to our Privacy Officer at support office.

If we are unable to provide you with access to your information, or make any amendments which you have requested, we will provide you with written reasons for our refusal within a reasonable time period.

### **Complaints**

If you believe that we may have breached the APPs, or failed to comply with this Privacy Policy, you may make a written complaint addressed to our Privacy Officer at our support office.

We take all complaints seriously and will respond to your complaint within a reasonable period.

### **More Information**

If you wish to contact us regarding this Privacy Policy, you may write to our Privacy Officer.

If you are interested in obtaining additional information about privacy, you can visit the Australian Privacy Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).

### **Website Security**

Please note that there are inherent risks in transmitting information over the Internet. There is a possibility that your information could be accessed by a third party while in transit. Each User of the recruitment platform should make their own assessment of the possible security risks to their information when deciding whether or not to use the site.

We cannot ensure or warrant the security of any information transmitted to us online and individuals do so at their own risk. To the extent permitted by law, we accept no responsibility for the unauthorised access of personal information held by us.

