

## Privacy Policy

PJ Salt & JA Shein trading as Salt & Shein, ABN 83 031 384 597 and Salt & Shein Services Pty Ltd, ABN 97 149 240 255 (collectively “**Salt & Shein**”, “**We**”, “**Us**”, “**Our**”) are committed to providing you with the highest levels of professional service. This includes protecting your privacy. We comply with the Australian Privacy Principles (“**APP(s)**”) contained in the Privacy Act 1988 (Cth)(“**Privacy Act**”).

We understand and respect the importance you place on the privacy of your personal information. To protect your right to privacy, we have developed a Privacy Policy, which explains:

- Our policy in relation to our privacy obligations to you
- How we collect, hold, use and disclose your personal information Your right of access to your personal information
- Your right to inspect and, where necessary, correct the personal information that we hold about you
- Your right to have your privacy complaints investigated and resolved
- Your right to have your personal information protected from misuse or unauthorised access

Salt & Shein will take all reasonable steps to protect the privacy of the personal information that we collect and use. Our Privacy Policy sets out how we intend to do so. This policy applies to all clients, individuals, job applicants and prospective employees who provide us with their personal information.

### What is personal information?

Personal information is any information that can be used to identify you. This includes any personal information or opinions about you, whether true or not, no matter how the information or opinions are recorded.

*Sensitive information* is a special category of personal information and includes information about your health, race or ethnic origin, political or religious beliefs, membership of a trade union or association, sexual preferences or criminal record. We will not disclose your sensitive information without your express prior consent unless there is a need to disclose such information in accordance with the Privacy Act 1988 (Cth).

### Why do we collect personal information?

We collect the personal information, sensitive information and resumes of individuals as a result of applications received for positions that we advertise on behalf of our clients.

We also collect and use personal information for the following purposes:

- To contact you regarding other recruitment opportunities
- For assessing and facilitating your application for employment with prospective employers
- Responding to your requests, enquires and/or complaints
- Providing you with any communications in which we think you might be interested, or which you have requested

- Letting you know about developments in our procedures, products, services, activities and programs that might be useful to you.

### **What personal information do we collect and use?**

Personal information that we collect and use may include your name, date of birth, current address, email address, telephone numbers, work history, performance appraisals, qualifications, health information, personal history, opinions from referees and our assessment of you as a prospective candidate for recruitment.

The personal information that we collect and hold usually falls into the following categories:

- Personal information obtained from job applicants in connection with previous periods of employment
- Work performance information, qualifications and academic transcripts
- Information about incidents in the workplace
- Information and opinions from referees
- Information submitted and independently obtained in relation to absences from work due to leave, illness or other causes
- Information obtained to assist in managing client and business relationships

We will not use your personal information for any purpose which is not related to the service we provide to you or for any purpose for which you would not reasonably expect us to use your personal information.

We will take all reasonable steps to ensure that the personal information that we hold is accurate and up to date. If you feel that information about you is not accurate or your details have or are about to change, please inform us and we will correct or update your personal information.

If you would like to access any of our services on an anonymous basis please tell us. If this is possible and lawful, we will take all reasonable steps to comply with your request. However, if you choose not to provide us with your personal information we may not be able to provide you with the services or assistance you require, including arranging suitable interviews for you.

### **How do we collect personal information?**

Where possible, we collect your personal information directly from you over the phone, in person, when you complete one of our application or contact forms (including online) or provide any other information in connection with your application or any other additional information about you.

If you feel that the information that we are requesting is not information that you wish to provide, please feel free to raise this with us.

In certain situations we also obtain information from third parties and this may relate to:

- reference about you
- results of inquiries that we might make of your former employers, work colleagues, professional associations or registration body

- results of any competency or medical test or any background check, including, but not limited to credit, criminal record checks and working with children checks
- any complaint or other information from or about you in the workplace
- any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you were involved
- any information about a workplace accident in which you are involved
- information about you that we collect from public domain sources.

#### How we hold personal information

We take all reasonable steps to secure your personal information and to protect it from loss, misuse or unauthorised disclosure, modification or destruction. Security measures include limiting access to the information we collect about you to “a need-to-know” basis, limiting physical access to our premises and putting in place other physical, electronic, and procedural safeguards in line with industry standards. Electronic information is protected by various security measures and access to information and databases is restricted to staff of Salt & Shein that need access to the information in order to perform their duties.

We store digital information with third party storage providers on servers within Australia and take all reasonable steps to ensure that we deal with reputable entities for the purposes of storing and processing personal information.

#### Do we send information overseas?

We do not usually send personal information out of Australia. If you need us to send information to another country we will do so with your consent. If we are otherwise required to send information overseas we will take measures to protect your personal information. We will protect your personal information either by ensuring that the country of destination has similar protections in relation to privacy or that we enter into contractual arrangements with the recipient of your personal information that safeguards your privacy.

#### When do we disclose your personal information?

For the purposes referred to in this policy we may disclose your personal information to:

- Prospective employers
- Your referees
- Your former employers
- Educational institutions
- Our clients
- Our referees
- Our professional advisors including our accountants, auditors and lawyers
- Our related companies and our contractors and suppliers

### **Access to and correction of your personal information**

You have a right to access and copy your personal information, subject to certain exceptions provided for in the *Privacy Act 1988* (Cth). If you would like to access your personal information please follow the procedures set out in our Access Policy.

Our Access Policy is outlined below. For security reasons, you will be required to put your request in writing and provide proof of your identity. If you are able to establish that personal information we hold about you is not accurate, complete or up to date we will take all reasonable steps to correct our records.

### **Direct Marketing**

We only engage in direct marketing practices in accordance with the law. You may contact [info@saltshein.com.au](mailto:info@saltshein.com.au) at any time to request that you no longer receive any marketing information from us.

### **Website Browsing Links to other websites**

Accessing our websites will result in some information being logged including the time of access, IP address and the pages that have been viewed or accessed.

### **Cookies**

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory. Our website does not use these "cookies" explicitly. However, the website may use third party code and libraries that use "cookies" to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this Service.

### **Notifiable Data Breaches**

We comply with the amendments to the Privacy Act, effective from 22 February 2018, in relation to notifiable data breaches and has an updated plan to ensure compliance with the new requirements, including notification of the Australian Information Commissioner and affected individuals of certain types of data breaches, and are able to promptly respond to any suspected data breaches. A notifiable data breach happens when there is unauthorised access to, unauthorised disclosure of, or loss of, personal information which is likely to result in serious harm to the individual to whom the information relates.

### **Rights of individuals located in the European Union (EU)**

In addition to the Privacy Act, individuals located in the European Union (EU) may also have rights under EU based rules known as the General Data Protection Regulation (GDPR). The key obligations under the GDPR include Notice, Individual Rights, and Retention. Each user has a right of confirmation (to confirm whether or not Personal Information concerning the user is being

processed), access (the right to request what Personal Information is stored about the user and obtain a copy of that said information), erasure (the right to request that any Personal Information concerning the user be erased without delay when no longer required, or when the user withdraws consent), rectification (the right to rectify any inaccurate information concerning the user), portability (the right to receive the Personal Information concerning the user, which was provided to us, in a readable format), object (the right to object the processing of the Personal Information concerning the user unless we can demonstrate compelling legitimate grounds for the processing which overrides the interests, rights, and freedoms of the user/data subject, or for the establishment, exercise or defence of legal claims), restriction of processing (the right to restrict processing where the accuracy of the Personal Information is contested by the user/data subject for a period enabling the controller to verify the accuracy of the Personal Information; or the processing is unlawful and the user/data subject opposes the erasure of the Personal Information and requests instead the restriction of their use instead; or we, the controller, no longer need the Personal Information for the purposes of the processing, but they are required by the user/data subject for the establishment, exercise or defence of legal claims), as set out in Articles of the General Data Protection Regulations of the EU.

#### **Children Under the Age of Sixteen**

We do not knowingly collect Personal Information from children under the age of sixteen. By providing any Personal Information to us, you represent and warrant that you are at least sixteen years of age. If you are under the age of sixteen, we require that you do not provide any Personal Information to us. If you are a parent or guardian of a child under the age of sixteen who has provided Personal Information to our site, please contact us at [info@saltshein.com.au](mailto:info@saltshein.com.au).

#### **Complaints**

We have a Grievance Policy for dealing with your privacy complaints. The purpose of the policy is to ensure that any person that has a complaint with the way their personal information is collected, used, disclosed, stored and administered may lodge a complaint under the Grievance Policy. All complaints will be treated seriously and dealt with promptly. The Grievance Policy is our way of ensuring your privacy concerns are raised and addressed promptly. Our Grievance Policy can be accessed below.

We will investigate the complaint and will endeavor to respond to you within thirty (30) business days. We will take immediate steps to redress proven privacy concerns or breaches.

#### **Lodging a complaint with the Australian Information Commissioner**

If you do not receive a response from us after thirty (30) days or if you are not satisfied with the response, you can then lodge a complaint with the OAIC (telephone: 1300 363 992 | Website: [www.oaic.gov.au](http://www.oaic.gov.au)).

**Access to this Privacy Policy:** This policy can be viewed at our website at [www.saltshein.com.au](http://www.saltshein.com.au). Alternatively, you can request a copy of this policy

using our contact details below.

### How to contact us

If you would like more information on privacy or have any questions in relation to this policy, we can be contacted by telephone, mail or facsimile as follows:

Salt & Shein

Aurora Place

Level 12, 88 Phillip St.

Sydney NSW 2000

Telephone: (02) 9947 9732

Facsimile: (02) 9947 9777

We reserve the right to review, and if necessary, change this policy.

### Fair Trading Amendment (Employment Placement Services) Act 2002 and Regulations

The above Act and Regulations require us to provide the following statement to you.

- Salt & Shein is an employment placement service and we do not charge candidates (job applicants) a fee for the purpose of finding candidates employment.
- We do not engage in any misleading or deceptive conduct including activities such as:
  - Advertising a position as being available when we know no such position exists.
  - Knowingly giving misleading information to a candidate about the nature of a position.

Any job seeker or job applicant who believes that any employment placement service has acted inappropriately may contact the Department of Fair Trading on 133 220.

### **ACCESS POLICY – Salt & Shein**

How we provide access to your personal information

#### Purpose

The purpose of this Policy is to set out how Salt & Shein provide access to your personal information. The Access Policy is part of our Privacy Policy and our desire to provide for, maintain and give effect to your right to privacy.

#### Overriding principles

At all times conduct under this Policy will be governed by the following principles:

- All requests will be dealt with promptly and in a confidential manner
- Any inaccurate or out of date information will be corrected
- Your request to access your personal information will not affect any commercial or professional arrangements between you and Salt & Shein

### How to obtain access?

We will provide access by allowing you to inspect, take notes of or receive copies or print outs of the personal information that we hold about you. To obtain access please make your request in writing, addressed to us. Our contact details are available on our website.

For security reasons you will be required to put your request in writing and provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

If you are able to establish that the personal information we hold about you is not accurate, complete or up to date we will take all reasonable steps to correct our records.

### When will access be denied?

Access will be denied if:

- The request does not relate to the personal information of the person making the request
- Providing access would pose a serious and imminent threat to the life or health of a person
- Providing access would create an unreasonable impact on the privacy of others
- The request is frivolous and vexatious
- The request relates to existing or anticipated legal proceedings
- Providing access would prejudice negotiations with the individual making the request
- Access would be unlawful
- Denial of access is authorised or required by law
- Access would prejudice law enforcement activities
- Access discloses a 'commercially sensitive' decision making process or information
- Any other reason that is provided for in the Australian Privacy Principles

If we deny access to information we will set our reasons for denying access. Where there is a dispute about your right of access to information this will be dealt with in accordance with our Grievance Policy.

### Time

We will take all reasonable steps to provide access or the information requested within 14 days of your request. In situations where the request is complicated or requires access to a large volume of information, we will provide access or the information requested within 30 days.

We may seek payment for our costs of supplying you with this information.

## **GRIEVANCE POLICY – Salt & Shein**

How we handle privacy complaints

Who may lodge a grievance or complaint under this policy?

If you have provided us with personal information, or we have collected and

hold your personal information, you have a right to make a complaint and have it investigated and dealt with under this policy.

What is a “privacy” complaint?

A privacy complaint relates to any concern that you may have regarding our privacy practices or our handling of your personal information. This could include matters such as:

- How your personal information is collected or stored;
- How your personal information is used or disclosed
- How access is provided to your personal information.

**What do I do if I have a complaint about the privacy practices of Salt & Shein?**

If you have a complaint about our privacy practices or our handling of your personal information please contact us. We try to resolve complaints at the local level if possible. All complaints will be logged on our database. Our contact details are available on our website.

### **Complaint resolution procedure**

Once the complaint has been made, we will try to resolve the matter in a number of ways:

- We may request further information from you. You should be prepared to provide us with as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and determine an appropriate solution. All details provided will be kept confidential.
- We will discuss options for resolution with you and if you have suggestions about how the matter might be resolved you should raise these with us
- Where necessary, the complaint will be investigated. We will try to do so within a reasonable time frame. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.
- If your complaint involves the conduct of our employees we will raise the matter with the employee concerned and seek their comment and input in the resolution of the complaint.
- If your complaint is not able to be resolved at a local level it will be referred to a Director.
- If your complaint is found to be substantiated, you will be informed of this. We will then take appropriate agreed steps to resolve the complaint, address your concerns and prevent the problem from recurring.
- If the complaint is not substantiated, or cannot be resolved to your satisfaction, but this Policy has been followed, the decision may be referred to an appropriate intermediary. For example, this may mean an appropriately qualified lawyer or an agreed third party, to act as a mediator.
- If you are still not satisfied with the outcome you are free to take your complaint to the Office of the Federal Privacy Commissioner.

We will keep a record of your complaint and the outcome.

**Anonymous complaints**

We are unable to deal with anonymous complaints. This is because we are unable to investigate and follow-up such complaints. However, in the event that an anonymous complaint is received we will note the issues raised and, where appropriate, try and resolve them appropriately.