

# Zinc Recruitment Pty Ltd

## Privacy Policy

### 1. Introduction

We manage personal information in accordance with the **Privacy Act 1988** and **Australian Privacy Principles**. This policy applies to information collected by Zinc Recruitment Pty Ltd.

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.

By following the links in this document, you will be able to find out how we manage your personal information as an [APP Entity](#) under the [Australian Privacy Principles \(APPs\)](#). You will also be able to find out about the [information flows](#) associated with that information.

If you have any questions please [contact us](#)

#### 1.1. APP Entity

Zinc Recruitment manages personal information, as an APP Entity, under the [Australian Privacy Principles \(APPs\)](#).

#### 1.2. Information Flow

When we collect your personal information:

- we check that it is reasonably necessary for our [functions or activities](#) as an Employment Agency who provides both permanent and on-hire services
- 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. Kinds 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 Agency and is likely to differ depending on whether you are:

- a [Workseeker \(Candidate\)](#);
- a [Client](#);
- a [Referee](#);

### 2.1. For Workseekers (Candidates)

The type of information that we typically collect and hold about Workseekers 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:

- Your contact details
- Copies of your ID (passport or birth certificate)
- Details of referees you have nominated
- Tax File Number
- Superannuation details
- Bank Account Details
- Reference Checks

### 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:

- Names and contact details of hiring managers
- Details about the organisation's type of business; clients and projects
- Size and organisational structure

### 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 Workseekers for particular jobs or particular types of work and includes:

- Name and contact details of the referee
- Referee's job title and place of work
- Information provided about the Workseeker

### 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 [Workseeker \(Candidate\)](#)
- a [Client](#)
- a [Referee](#)

The following sections are also relevant to our use and disclosure of your personal information:

- [Our Policy on Direct Marketing](#)

#### 3.1. For Workseekers (Candidates)

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

- work placement operations;
- recruitment functions;
- statistical purposes and statutory compliance requirements;

#### 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;
- marketing services to you;
- statistical purposes and statutory compliance requirements;

#### 3.2. 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;
- Workseeker suitability assessment;
- recruitment functions;

#### 3.3. Our Policy on Direct Marketing

On occasion your personal information will be used for marketing purposes as outlined below. However Zinc Recruitment complies with all Australian anti-spam legislation, covered under the [SPAM Act 2003](#).

Your personal information will specifically be used for marketing purposes as follows:

- Directly and not by a third party to promote current job vacancies
- Direct Marketing Lists are only acquired through opt-in procedures
- Your personal information is not disclosed to a third party without your consent

## 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 [Workseeker \(Candidate\)](#)
- 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.

Sometimes the technology that is used to support communications between us will provide personal information to us - see the section in this policy on [Electronic Transactions](#).

See also the section on [Photos & Images](#).

### 4.1. For Workseekers (Candidates)

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

Personal information is also collected when:

- Registering your details online via our website
- Applying to one of our job advertisements online
- Connecting to any Zinc Recruitment employees via social media sites (such as LinkedIn)

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.

## 4.2. For Referees

Personal information about you may be collected when you provide it to us in the course of our checking Workseeker references with you and when we are checking information that we obtain from you about Workseekers.

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. Photos & Images

We will not request that you supply photographs, 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. However we will copy or scan your passport, to assist in us validating your rights to work in Australia.

## 4.4. Electronic Transactions

As there are a variety of electronic transactions that we use to gather personal information, this section details how we handle your personal information collected from our website, [www.zincrecruitment.com.au](http://www.zincrecruitment.com.au), and via other technology in the course of electronic transactions.

Sometimes, we collect personal information that individuals choose to give us via online forms or by email, 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 site 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. It might help you to look at the Oaic's resource on [Internet Communications and other Technologies](#)

### 4.5.1 Social Networks and Web Searches

To ascertain a candidate's suitability for positions it is common practice for us to conduct research and checks via social network sites and web searches of which we may record that information. We only search sites that are available in the public domain.

#### **4.5.2 Browsing**

When an individual views our website, our internet service provider (ISP) makes records of the visit and logs the following information for statistical purposes:

- The individual's server address
- The individual's top level domain name (e.g. .com .org. net etc.)
- The pages the individual accessed and documents downloaded
- The previous site or referral path the individual visited from
- The type of browser being used

Zinc Recruitment does not identify users or their browsing activities other than in the event of an investigation where a law enforcement agency may exercise a warrant to inspect the ISP server logs.

#### **4.5.3 Cookies**

Cookies placed on your browser do not identify you personally to us but they may link back to a database record about you.

Our website uses Cookies to monitor usage, enable online registrations, employment enquiries and create a record of when you visit our website and what pages you view. You can choose to delete the cookies on your browser and/or disable cookies altogether.

#### **4.5.4 Cloud Computing Services**

Zinc Recruitment does not currently use Cloud Computing Services as a standard business tool. However occasionally cloud services (such as Dropbox), are utilised on a case by case basis to allow remote/mobile access to your personal information. This is not common practice and all reasonable steps are taken to delete your personal information after use so that your personal information does not remain stored in 'the cloud'.

All reasonable steps are taken to ensure that any cloud service provider used enforces the obligations to protect privacy of your personal information.

#### **4.5.5 Emails**

Our Recruitment database software logs all emails sent, received and may include delivery and receipt notifications for tracking.

When your email address is received by us through sending us an email, applying for job, registering/contacting us on our website, contacting us through social media sites etc. it will only be used or disclosed for the purpose for which you have provided it and will not be used for marketing purposes without your consent.

#### 4.5.6 Call and message logs

Our telephone system and mobile phones log telephone calls and messages received. We also make records in our Recruitment database system of phone calls made and received.

When your call number is received by us the number will only be used or disclosed for the purpose for which you have provided it and it will not be added to a phone list or used for any other purposes without your consent.

#### 4.5.7 Teleconferences and Video conferences

We do not record teleconferences or video conferences without your consent. When we utilise video call technology and wish to record a call we will inform you of the purpose and reasons for it being retained, prior to the call.

#### 4.5.8 Database

Zinc Recruitment uses recruitment software and databases to log and record all information relating to recruitment operations.

#### 4.5.9 Paperless Office

Zinc Recruitment operates a partially paperless office. Any paper based communications with us may be digitised and recorded in a digital format. Any paper based information may be confidentially retained, archived or destroyed as deemed necessary.

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

## 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

Our Information Record System comprises a software database and a hardcopy filing system. We store your information electronically on our database which has appropriate security settings and managed via an internal server.

We store your information in hard copy form in secure filing storage units.

## 5.2. Information Security

We take all reasonable steps to destroy or permanently de-identify personal information when it is no longer required for any purpose. It is not always practicable to destroy or de-identify electronic data. However where it is not reasonable to destroy or de-identify personal information in electronic form we take all reasonable steps to prevent unauthorised access to it.

We store any paper based personal information in secure filing storage with only authorised Zinc Recruitment employees having access. We implement a yearly culling procedure to destroy any paper based personal details held past five years when they are no longer required for any purpose. Our culling procedure includes shredding and secure disposal.

All Zinc Recruitment employees are trained in their information security obligations under this privacy policy.

## 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
- 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;
- Australian Government Agencies (i.e. Centrelink)

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.



## 7. Cross-Border Disclosures

Your personal information will not be disclosed to overseas recipients unless discussed with you prior, on a case by case basis, and your consent is given.

## 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.

For more information about access to your information see our [Access Policy](#).

For more information about applying to correct your information see our [Correction Policy](#)

### 8.1. Access Policy

If you wish to obtain access to your personal information you should contact our Director. You will need to be in a position to verify your identity.

In the event you do need to access your personal information the following will apply:

- Our minimum timeframe for responding to your request is 21 days
- In the event we refuse access we will provide an explanation around the privacy aspects of why we cannot allow access

### 8.2. Correction Policy

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 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.

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.

We note that our minimum timeframe for responding to a correction request is 21 days.

## 9. Complaints

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

For more information see our [Complaints Procedure](#) .

### 9.1. 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 Director, Julie Bullen, whose contact details are [info@zincrecruitment.com.au](mailto:info@zincrecruitment.com.au) or 07 3252 9988

You can also make complaints to the [Office of the Australian Information Commissioner](#)

Complaints may also be made to [RCSA](#) the industry association of which we are a member.

RCSA administers a Code of Conduct for the professional and ethical conduct of its members.

The RCSA Code is supported by rules for the resolution of disputes involving members.

NOTE: The Association Code and Dispute Resolution Rules do NOT constitute a recognised external dispute resolution scheme for the purposes of the APPs; but are primarily designed to regulate the good conduct of the Associations members

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 established 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](#)