HOBAN Recruitment Privacy Policy

1. HOBAN's commitment to privacy

HOBAN Recruitment Pty Ltd ACN 052 201 313 (HOBAN), and our Australian related entities and subsidiaries, operate a recruitment agency which provides recruitment solutions across a wide range of sectors.

HOBAN is committed to managing personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth) (**Privacy Act**). We understand the importance of being open and transparent with you in the way in which we collect, hold, store, use and share your personal information. As an APP entity under the Privacy Act, we take protecting your privacy very seriously. As we may sometimes work as a contracted service provider to a range of Commonwealth, State and Territory government agencies, it might become necessary for us to collect and manage personal information as an Agency under different privacy arrangements including where we are contractually bound by the agency to comply with their obligations under State, Territory or Commonwealth laws. If you wish to know whether this applies to you, please contact us https://www.hoban.com.au/contact-us/.

We strongly encourage you read this document, so that you understand and are comfortable with how we handle your personal information. If you have any questions about this document, or about HOBAN's handling of your personal information, please contact us using the relevant contact details set out at section 15.

2. About this Privacy Policy and when it applies

This document sets out our policies for managing your personal information and is referred to as our Privacy Policy.

In this Privacy Policy:

- **"we"**, **"us"** and **"our"** refers to HOBAN;
- **"Work Seeker"** refers to individuals who engage with us as a job candidate or potential job candidate, including by submitting a job application to us or by registering your interest through our online portal available at https://www.hoban.com.au/register-your-interest/. This includes job candidates who are successful in gaining a placement at a HOBAN Client organisation;
- **"Client"** refers to organisations or government agencies that we contract with to assist with their recruitment needs;
- **"Referee"** refers to third-party sources that you, as a Work Seeker, list as your nominated job reference; and
- "you" and "your" refers to any individual from whom we collect personal information, including Work Seekers, Clients (to the extent they are individuals or represented by an individual) and Referees; and
- **"Privacy Laws"** refers to the Australian *Privacy Act 1988* (Cth), the *Spam Act 2003* (Cth) (**Spam Act**) and the *Do Not Call Register Act 2006* (Cth).

This Privacy Policy sets out how we collect, store, process, use and disclose personal information (including personal information we collect, and personal information submitted to us, whether offline or online). For example, this may include information we collect from you:

- as a Work Seeker, Client and/or Referee;
- as a supplier to us;
- when you apply for a job at HOBAN itself; or
- when you otherwise interact with us, including by:
    - visiting our website available at https://www.hoban.com.au/;
    - sending us an enquiry or providing us with feedback; or
    - asking us to send you information about potential job placements at our Client organisations.

Other privacy related notices and terms and conditions may apply to you, such as a privacy collection notice provided (either verbally or in writing):

- when you register your interest with us as a Work Seeker;
- when we contact you as a Referee for a relevant Work Seeker; and
- when you apply for a role at HOBAN itself or accept a position to work at HOBAN.

This Privacy Policy only applies to HOBAN. If you are dealing with another member of the HOBAN's Australian related entities (i.e. RED Appointments Pty LTD, RED Appointments NT and BREXA Australia & New Zealand), including internationally, you should consult that entity's separate privacy policy to understand how they handle your personal information.

3. What is personal information?

"Personal information" is defined in the Privacy Act, and means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

In this Privacy Policy, whenever we use the term "personal information", we are referring to this legal definition. Personal information does not include aggregated or de-identified data.

4. What information do we collect about you and how do we collect this information?

Normally we collect your personal information from you directly, however, in some circumstances, we may also collect personal information about you from other people and organisations that we work with as part of the recruitment. These include our contracted service providers and providers of web-based applications/platforms we use as part of our process, such as:

- Seek Talent;
- LinkedIn;
- Referoo;
- Bullhorn Onboarding;
- Workpro;
- Criteria;
- Hogan;
- Astute;
- IKM Assessments; and/or
- Spark Hire.

The types of personal information that we collect about you will depend on how you interact with us and the type of dealings you have with us.

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 Social Media & Online Privacy. You can contact us by land line telephone if you have concerns about making contact via the Internet.

Generally speaking, the kinds of personal information HOBAN collects may include:

Type of personal information	What this includes	How/when do we collect this information?
Personal and contact details	This may include your: • full legal name;	We will collect this information directly from you (including if you are a Work Seeker) when you:

	• email address; • phone number; and • address.	• register your interest through our online portal available at https://www.hoban.com.au/register-your-interest/; • register for notifications in relation to future job notifications • apply for a role advertised on HOBAN's website; • approach HOBAN directly, for example via email, phone or in person (for example when you attend an event like HOBAN Golf Day or the HOBAN coffee stand); • when you attend a conference of networking event where HOBAN is present; or • use web-based application and placement management applications to submit identification documents, receive job offers, complete online interviews and assessments, submit references, undertake onboarding and inductions, or upload time sheets. If you are a Referee, we will collect this information when we contact you either by phone, email or in person in the course of checking a Work Seeker's references and when we are checking information that we obtain from you about Work Seekers.
Information about your profession, skills, qualifications and relevant experience	This may include your: • education, qualifications and certifications; • professional memberships, associations, affiliations with relevant industry bodies or organisations; • employment history; • relevant volunteer or unpaid work; • awards, recognition and special achievements; • skill-specific licences (e.g. a forklift licence); • interview results; • membership to trade unions or association – **this may include sensitive information;** and • aptitude test results (if relevant).	We may collect this information directly from you (usually via your resume if you are a Work Seeker) when you: • register your interest through our online portal available at https://www.hoban.com.au/register-your-interest/; • apply for a role advertised on HOBAN's website; or • approach HOBAN directly via email or phone. We may also collect this information from third parties, for example, referees, previous employers, professional registration authorities, educational institutions, or through our third-party providers such as: • **Workpro**, who conducts OHS induction and work rights onboarding on our behalf); • **IKM (TeckCheck, Inc)**, who conduct skills testing and data entry on our behalf; • **SparkHire**, who provide an interview platform; and • **Criteria Corp**, who conduct psychometric assessments on our behalf. If you are a Referee, we may collect this information when we contact you either by phone, email or in person.

Identification documents	This may include your: • passport; • birth certificate; • drivers' licence; • visa (if applicable); and • other identification documents.	We may collect this information from Work Seekers when you: • log in to our online portal using the credentials we provide in our Welcome Email and complete your onboarding; and/or • participate in our candidate screening and assessment process. We may also collect this information from Work Seekers through our third-party providers, such as **Workpro**, who conducts OHS induction and work rights onboarding on our behalf. If you are a Referee, we may collect this information when we contact you either by phone, email or in person (if required).
Information about your accessibility requirements	**This may include sensitive information, such as details about your health and any disabilities you have.**	If you are a Work Seeker and email us to request an adjustment to be made during the recruitment process due to a disability (including by emailing adjustments@hoban.com.au), we may collect this information.
Background check information	This may include your: • Working With Children check clearance number; and/or • national police check information (if applicable) – **this may include sensitive information, such as if you have a criminal record.**	If you are a Work Seeker, we may collect this information directly from you when you participate in our candidate screening and assessment process: We may also collect this information: • from third parties (for example, verification providers, referees, previous employers, professional registration authorities or educational institutions); and/or • publicly available information (for example, court decisions).
Information about your work performance, and employment health and safety	This may include: • performance review information; and/or • **sensitive information, such as health information.**	If you are a Work Seeker, we may collect this information from third parties (for example, employers with whom we have placed you) when: • we receive reports of your performance from employers with whom we have placed you; and/or • we reasonably believe that your being in, or remaining in, a position might present a risk to your health and safety or to that of others for whose health or safety we are responsible.
Banking, tax and superannuation details	Such as your bank account and superannuation fund details.	We collect this information directly from Work Seekers via our payroll portal when your placement at an on-hire assignment has been confirmed.

Health information	**(for example, vaccination status or medical test results (if required)) - <u>this is sensitive information</u>**	We may collect this information directly from Work Seekers: • when you complete our pre-employment health questionnaire as part of the onboarding process; • during functional assessments prior to placement (if required); • during drug and alcohol assessments (if required); and/or • through other means as required for potential or actual placements where this is an inherent requirement (for example, certain roles with our clients in the Healthcare industry).
Information about another person	if you are w **Work Seeker**, this may include your Referee's: • full legal name; • email address; • phone number; and • address. If you are a **Referee**, this may include: • information about your relationship and knowledge and opinions of the Work Seeker, as relevant to the reference we are seeking; • other background information about the Work Seeker. If you are a **Client**, this may include: • employee contact details (including their name and email address); and/or • roles and reporting lines.	You may provide us with personal information which relates to another person, including contact details of your Referees. If you do so, you agree that you have received permission from these individuals for us to collect, use, and share, their personal information in accordance with this Privacy Collection Notice. You should also let them know about this Privacy Policy.
Job description information	This may include: • roles, reporting lines, inter-personal communication, and cultural fit requirements within your organisation; • business, social, or personal interests about which we may be able to provide news and information; and/or • celebration milestones and dates, preferred social media contact channels that you choose to share with us.	We may collect this information from Clients when you contact or otherwise engage with us to source a candidate or recruit through us.

Biometric information	This may include fingerprint, voice or facial recognition (**this is sensitive information**).	We may collect this information from employees and other individuals through biometric technologies. For example, we use a third-party application/time clock to conduct facial recognition of you when you clock in and clock out of your work shifts.
Online and digital services information	This may include information (that is not always identifiable) about your: • device ID; • device type; • geo-location information; • IP address; • browsing information, including information about how you interact with our website; and/or • information collected from Cookies and other online tracking technologies (see section 10.2 below).	If you only browse our website, we do not collect information that identifies you personally, though we may collect information related to your visit to our website. However, third-party services, such as Google and Meta, may collect data related to your visit through tracking technologies we use for analytics and marketing purposes. These third-party services may link this information to your personal profiles on their platforms if you are logged in. Please note that how these third parties handle and use your data is governed by their own privacy policies, not ours. We recommend reviewing their privacy policies for more information on their data collection practices and options available to you for managing your privacy.
Unsolicited information	Unsolicited personal information is personal information we receive that we have taken no active steps to collect (for example, an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement).	We may collect this information directly from you. Please note that we may keep records of unsolicited personal information to the extent that it is permitted by the Privacy Act (for example, if the information is reasonably necessary for one or more of our functions or activities). If not, we will destroy or de-identify the information as soon as practicable, within 30 days upon request, provided it is lawful and reasonable to do so.
Publicly available information	Information that is publicly available online, such as on online forums, websites, newspapers, journals, directories, the Internet and social media sites.	We may collect this directly from the publicly available source (e.g. websites, or social media channels).

5. Can you deal with us without providing your personal information?

You are under no obligation to provide your personal information to HOBAN. However, without certain information from you, HOBAN may not be able to provide you with the full suite of services that is ordinarily offers. For example, if you are a job applicant or potential job applicant and do not provide your personal information, we may:

- not be able to complete your registration and onboarding with us, or create an account for you to use our

online portal;

- not be able to progress your job application(s);
- be limited in our ability to locate suitable work for you;
- be limited in our ability to place you in work; and/or
- decline to represent you in your search for work or put you forward for particular positions.

6. Why do we collect, store and use your personal information?

We collect personal information that is necessary to provide you with our recruitment services, and to carry out our business.

We may use your personal information for purposes which are incidental to the provision of recruitment services and promotion of our services, or for other purposes which are within your reasonable expectations or permitted by law.

The purpose for which we usually collect, store, and use your personal information depends on how you interact with us (for example, whether you are a Work Seeker or a Referee) by may include the following purposes:

Purpose	Explanation
To facilitate Work Seekers' actual or possible placement in employment with our Clients, or to provide other recruitment-related services	We may collect, store and use your personal information to: • verify your identity as a Work Seeker or Referee; • contact you to complete your registration and onboarding as a candidate with HOBAN (please note that we may use generative artificial intelligence (**AI**) technologies to assist us with crafting responses to you and communicating with you generally, based on personal information you have provided us); • assess your suitability for registration with us; • identify work placement opportunities (please note that we may use AI tools which utilise automatic decision making technologies to review your application and/or match you with suitable work placement opportunities based on personal information you have provided us, such as information about your profession, skills, qualifications, and relevant experience); • identify your training needs; • validate (including from appropriate third-party sources such as the police, your referees, etc) your resume, nominated references, stated qualifications, experience, training or abilities. Where we require third party validation, we will tell you how we propose to obtain it • make suggestions to you, whilst you remain registered with us, for further training in connection with work of the type that you are seeking through us; • complete payroll functions; • make reasonable adjustments for you during the registration and onboarding process; and/or • notify you about our services and flag work opportunities or training or development opportunities available, including job opportunities that we think might interest you (in accordance with applicable Privacy Laws).

	In addition, we also use and disclose your personal information to third parties for this purpose, including: • **Referoo**, who conducts reference checking on our behalf, to enable them to provide you with a link to enter the contact details of your referees; • **Workpro**, who conducts OHS induction and work rights onboarding on our behalf, to provide you with a link to review this information and complete training which is required by law; • potential and actual employers and clients of HOBAN; • third-party service providers that provide HOBAN with AI technologies we use to assist us with assessing your suitability for work placement opportunities and communicating with you; and/or • appropriate third-party sources such as your Referees, to validate your resume, nominated references, stated qualifications, experience, training or abilities. Where we require third party validation, we will tell you how we propose to obtain it. If you are a Referee, we collect, store and use your personal information: • to confirm identity and authority to provide references; • for Work Seeker suitability assessment; and • general recruitment functions.
To fulfil our post-placement obligations, including managing any candidate replacement guarantee to our Clients	We may collect, store and use your personal information: ▪ for the purpose of your performance appraisals; ▪ to assess your suitability to be placed in or continue in positions that you may be offered; ▪ to manage any workplace rehabilitation in which you and we are involved; ▪ in relation to our management of any complaint, investigation or inquiry in which you are involved; ▪ in relation to any insurance claim or proposal that requires disclosure of your personal or sensitive information; ▪ to provide a reference concerning your work; and/or ▪ complying with any statutory obligations that apply to us.
To promote our recruitment services – *see section 11 for further information on direct marketing*	We may collect, store and use your personal information to send you direct marketing from HOBAN Recruitment, including legislative updates, newsletters, or as otherwise allowed under applicable Privacy Laws.
To manage your working relationship with us (including if you are an employee or contractor)	We may collect, store and use your personal information to assess your suitability for a position with HOBAN (note: this does not include positions with our Clients), and, if you successfully join us, to manage our working relationship with us.

To do business with you	We may collect, store and use your personal information about you if you interact with us on a commercial basis (such as if you are a service provider, contractor or supplier to us), or you otherwise interact with us on a commercial basis. If you are a Client, we may collect store and use your personal information for: ▪ business relationship management; ▪ to fulfil our recruitment functions; and ▪ marketing our services to you.
To create deidentified or aggregate data for data analytics activities	We may collect, store and use your personal information to create deidentified or aggregate data sets (which is no longer personal information). We do this by de-identifying or aggregating your information such as combining your information with information we have about, for example, our other Work Seekers, and with data we obtain from other sources. We use this deidentified or aggregate data to assist with our business decisions, such as to: • help us in understanding trends in Work Seeker behaviour (such as the main industries our Work Seekers are looking for placements in); • perform research and statistical analysis, including for service improvement purposes; and • improve the job opportunities and services we offer. We may use AI tools to manage and improve data health in our customer relationship management (**CRM**) system.
To comply with our legal and regulatory obligations	We may collect, store and use your personal information for the purpose of complying with our obligations under any applicable laws and regulations, including Privacy Laws. This includes for the purpose of audits of HOBAN's compliance.
To assist with any business, share sale or corporate restructure	We may collect, store and use your personal information for the purpose of facilitating or implementing a transfer or sale of all or part of our assets or business or if we undergo any other kind of corporate restructure, acquisition or sale.

7. How do we store and protect your personal information?

We are committed to protecting your personal information and ensuring that we store any personal information we collect securely (and in accordance with applicable Privacy Laws). Your information may be stored in hard copy (paper) or electronic format, in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers.

We take all reasonable steps to ensure that any personal information we collect, use or disclosure is accurate, complete, up-to-date and stored in a secure environment protected from:

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

7.1 Security and storage of personal information

Form	Explanation
Paper-based files	HOBAN is transitioning to a paperless office which means that most personal information formerly in paper-based form will now be stored digitally in secure systems (see 'Electronic records' below). Paper-based documents containing personal information will be securely disposed of once digitised. We maintain physical security measures to ensure that personal information still in paper-based files is protected, such as physical locks and security systems at our premises, security bins and off-site storage for historical records.

Electronic records	**Data Processing and Storage**
	
	We store electronic records securely in cloud environments hosted by third party service providers that are selected based on their adherence to data protection standards. We implement contractual agreements with these third parties that ensure the security and confidentiality of personal information that they store for HOBAN.
	
	Security Measures
	
	Personal information held in electronic records is also protected by implementing appropriate technical and organisational measures, including:
	▪ encryption (for data in transit and at rest);
	▪ access control policies (ensuring only authorized users can access data);
	▪ regular security audits and vulnerability assessments; and
	▪ various policies and procedures in place to safeguard individual's privacy.
	
	In particular, the following security measures are in place for the relevant electronic records:
	▪ **Emails**: Personal information transmitted via email shall be securely handled. Sensitive information will be encrypted, and care will be taken to avoid phishing or unauthorised access.
	▪ **Call and Message Logs**: All communication logs, including call history, text messages, and other communication records, are securely stored and accessed only by authorised personnel.
	  ▪ Personal data shared during teleconferences or video conferences (including audio and video content) shall be encrypted and stored securely, with access granted only to authorized participants.
	  ▪ Recordings of teleconferences and video conferences shall be stored in compliance with applicable Privacy Laws, with prior consent obtained from all participants where required.
	▪ **Mobile Devices**: Personal data accessed via mobile devices must be protected through encryption, device management protocols, and secure login methods. Mobile devices must be regularly updated to address known security vulnerabilities.
	
	Data Access

	Electronic records are only accessible by authorised personnel, with appropriate access controls and audit logs in place to monitor usage.
Our website	Our website uses encryption or other technologies to ensure that your personal information is securely transmitted via the internet. We encourage you to exercise care when sending your personal information via the internet.

7.2 How long do we keep your personal information?

We will only keep your personal information stored until it is no longer necessary for any purposes set out in this Privacy Policy or as required to comply with any applicable legal obligations.

When we no longer require your personal information, or upon request to delete, or de-identify, we will take steps to delete, de-identified or destroy that information (provided that it is lawful for us to do so).

8. Who do we share your personal information with and why?

We may share your personal information with third parties:

- for the reasons for which we collect, store and use that information (see above in section 6);
- for other purposes explained at the time we collect your personal information; or
- where we are otherwise allowed or required to do so under law.

Some of the third parties we may share your information with include the following:

Recipient	Explanation
HOBAN's Australian related entities, our subsidiaries and associated companies	We may share your personal information across HOBAN's Australian related entities (as appropriate). HOBAN's Australian related entities includes RED Appointments Pty LTD, RED Appointments NT and BREXA Australia & New Zealand. For example, we may share your personal information to another HOBAN related entity where that entity requires access to your personal information to provide us with IT support or other back-end services.
Potential and actual employers and clients of HOBAN	We may share your personal information with potential and actual employers and clients of HOBAN to facilitate your actual or possible work placement.
Our contracted service providers (CSPs) and advisors	We may share your personal information with a variety of our CSPs to assists us with delivering, promoting and managing our services. These may include: ▪ CSPs who assist us during the onboarding process, including Referoo and Workpro; ▪ CSPs that conduct aptitude testing and/or online interview platforms, including IKM (TeckCheck, Inc), SparkHire and Criteria Corp, if the specific role you have applied for requires this as part its recruitment process; ▪ specialist software vendors; ▪ legal and other professional advisors (such as insurance brokers, loss

	assessors, underwriters and financial advisors); ▪ superannuation fund managers; ▪ background checking and screening agents; and ▪ CSPs involved in managing or administering HOBAN's services, for example our marketing consultancy, administrative support provider, payroll support provider, internet service suppliers and database technicians.
Medical professionals, medical facilities or health authorities	In some cases, we may share your personal information with medical professionals if a medical assessment is required as part of placing you into a job or in the event that you are involved in a workplace accident or injury that requires medical attention.
Professional associations or registration bodies	We may share your personal information with a professional association or registration body that has a proper interest in the disclosure of your personal and sensitive information.
Referees	We may share your personal information with your nominated referees to validate details you have provided us with, including your resume, qualifications, experience, training or abilities.
Corporate restructure	We may share your information with third parties, whether affiliated or unaffiliated, for the purpose of facilitating or implementing a transfer or sale of all or part of our assets or business or if we undergo any kind of corporate restructure, acquisition or sale. In this context, your personal information may be transferred to another entity (or if such a sale, transfer, acquisition or corporate restructure is being contemplated by us).
Government and law enforcement agencies	We may share your personal information with government or other law enforcement agencies: • if they have a lawful entitlement to obtain the information; • if we are required to do so to meet our legal compliance obligations (for example, the Australian Taxation Office); and/or • to conduct a background check (for example, a criminal background check).
Marketing organisations	We may share your information with marketing organisations that assist us with our marketing communications or who send you marketing communications on our behalf. Please see the 'Do we use your information for direct marketing' at section 11 below for further information on how we engage in direct marketing.

We take every reasonable step to ensure that terms of service with our CSPs recognise that we are bound by obligations to protect the privacy of your personal information, ensuring the actions of the CSP do not cause a situation that could possibly breach those obligations.

9. Do we share your personal information overseas?

We generally collect your personal information in Australia. However, it is likely that we will share your personal information with overseas recipients in the locations set out in the table below. These recipients include HOBAN representatives based outside of Australia as well as our service providers who may handle, process or store your personal information on our behalf.

We may share your information with overseas recipients as follows:

Country	Type of Information	Likely Recipients / explanation
New Zealand	Selective personal information stored on HOBAN systems/platforms	Administration support provider who may access data for the day to day running of business functions
Philippines	Selective personal information stored on HOBAN systems/platforms	Administration support provider who may access data for the day to day running of business functions
United Kingdom	Selective personal information stored on HOBAN systems/platforms	Administration support provider who may access data for the day to day running of business functions
Ireland	Selective personal information stored on HOBAN systems/platforms	Administration support provider who may access data for the day to day running of business functions
USA	Selective personal information stored on HOBAN systems/platforms	Bullhorn – database provider
Japan	All personal information held by us	Brexa Holdings Inc – our parent company
Other	Your name, identifying details and the type of work you are seeking	If you have worked with an overseas employer, we might need to disclose your personal information to your previous employer to the extent necessary to enable us to undertake suitable reference checking.

We only ever share your personal information outside of Australia where we are permitted to do so under the Privacy Act. Generally, this means we will take reasonable steps to ensure your personal information is treated securely and in accordance with applicable Privacy Laws.

There are other circumstances not contained in the above table where we may disclose your personal information to an overseas recipient. For example, where you have provided your consent, or we are otherwise permitted to do so under other relevant laws.

10. How to we interact with you via the internet?

10.1 Third party links and sites

When you use our website or receive communications from us, links to websites which belong to other third parties may be included (and are provided for your convenience). You should make your own enquiries as to the privacy policies of these parties. We are not responsible for information on, or the privacy practices of, any third-party websites.

10.2 Website use and cookies/online tracking technologies

HOBAN may collect statistical information when you access and use our website and any online platforms available via our websites (such as our online portal), by utilising features and technologies of your internet browser or embedded in web content, including cookies and other online tracking technologies. Cookies and other online tracking technologies collect data about website traffic, assist in managing customised settings of the website and help deliver content. We collect certain information such as device type, IP address, and browsing information this way.

We use this information to analyse how our website is being used, to improve our website and provide you with a more use-friendly and customised website experience. These features and technologies do not specifically identify you unless you otherwise provide personal information to us that enables identification. In relation to cookies, if you do not wish to receive any cookies (other than those that are strictly necessary), you may use the settings in your browser to control how our browser deals with cookies. However, this may slow down or cause certain web pages to be inaccessible to you.

Third-party services, such as Google and Meta, may collect data related to your visit through these tracking technologies we use, for analytics and marketing purposes. These third-party services may link this information to your personal profiles on their platforms if you are logged in. Please note that how these third parties handle and use your data is governed by their own privacy policies, not ours. We recommend reviewing their privacy policies for more information on their data collection practices and options available to you for managing your privacy.

11. Do we share your personal information for direct marketing?

HOBAN and/or our third-party service providers may use your personal information to send you direct marketing information about legislative updates, newsletters, or as otherwise allowed under applicable Privacy Laws.

We will only send these communications in accordance with the Privacy Act (including Australia Privacy Principles 7) and the Spam Act, and only where you have not opted-out of receiving such communications from HOBAN.

You are always in control of the direct marketing communications which you receive from us and can opt-out at any time using the methods described in the table below. Generally, you can opt-out by following the relevant opt-out or unsubscribe instructions in the relevant communication (such as email or SMS message). You can also contact us using the details set out in section 15 of this Privacy Policy to tell us you would like to stop receiving direct marketing communications from us.

If you have indicated a preference for a method of communication, we will endeavour to use that method wherever practical to do so.

Format / Channel	Explanation	How to opt-out?
Direct marketing via email, SMS message and mail	We may use your personal information to send you direct marketing communications to keep you informed about services (including events) offered by HOBAN, which we think you might be interested in based on your interactions with us, or as otherwise allowed under applicable Privacy Laws.	You can opt-out by following the relevant unsubscribe instructions in the relevant communication (such as email or SMS message).

Important points regarding opting out

Importantly:

- regardless of whether you opt-out, we will still communicate with you if required by law to provide you with information, or in relation to the services we are providing you with (for example, in relation to a job you have enquired about or applied for through us); and
- if you opt-out of marketing communications, we will still need to communicate with you (for example to update you on the progress of an application you have made through us, or follow-up on our post-placement obligations once you have commenced placement at a job you obtained using our services).

12. How can you access or seek correction of your personal information?

You are entitled to request access to and/or correction of any of your personal information that we have. To make such a request, please follow the process set out below at 12.1 (Requests for access) and 12.2 (Requests for correction). We will respond to any such requests within a reasonable time, generally 30 days.

We may decline your request to access or correct your information in certain circumstances in accordance with the applicable Privacy Laws. For example, we may refuse your access request if:

- it relates to evaluative opinion material obtained confidentially in the course of our performing reference

checks. 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, and we do refuse access if it would breach confidentiality; or

- access that would impact on the privacy rights of other people.

If we do refuse your request, we will provide you with a reason for our decision. In addition, in the case that we refuse your request for correction, we will include a statement about your request with the personal information that we store.

12.1 Requests for access

If you wish to obtain access to your personal information you should contact our Privacy Officer using the contact details set out below in section 15. You will need to be in a position to verify your identity.

Consistently with guidance and advice provided by the OAIC, we may impose a charge (provided it is not excessive) for retrieving and providing access to your personal information. Any such charge would be calculated having regard to:

- our staff costs in searching for, locating and retrieving the requested personal information, and deciding which personal information to provide to you;
- our staff costs in reproducing and sending the personal information;
- the costs of postage or materials involved in giving access
- the costs associated with using an intermediary – e.g., where access might be granted indirectly or to paraphrased information.

In determining the amount to charge, we would consider:

- our relationship with you;
- any known financial hardship factors;
- any known adverse consequences for you if you do not get access to the personal information; and/or
- timeframes to access requests.

12.2 Requests for correction

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, up-to-date and complete. You can help us do this by contacting us if you notice errors or discrepancies in information we hold about you and informing us of any change in your personal details (for example, if you email address changes or if you move and change address).

We will take such steps as are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose (see section 6 'Why do we collect, store and use your personal information') 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.

13. Making a complaint about the handling of your personal information

If you have any questions or concerns about this Privacy Policy or how we have handled your personal information, you may contact us at any time using the relevant contact details set out below in section 15 below.

Please also contact us if you have a complaint about our handling of your personal information or if you believe that we have interfered with your privacy. If you are making a complaint about our handling of your personal information, it should first be made to us in writing.

Complaints may also be made to the Recruitment, Consulting & Staffing Association (RCSA) the industry association of which we are a member. RCSA administers a Code of Conduct (**RCSA Code**) 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 RCSA Code and grievance intervention rules do NOT constitute a recognised external dispute resolution scheme for the purposes of the APPs; but are primarily designed to ensure the good professional conduct of the Association's members.

If we receive your complaint about privacy, the following will occur:

No.	Step
1.	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.
2.	Upon confirmation of the above from you, we will generally write to you to acknowledge receipt and to confirm that we are handling your complaint in accordance with our policy within a week. We will first consider your complain to determine whether there are simple or immediate steps which can be taken to resolve the complaint. For example, if your complaint can be resolved by procedures for **access and correction** (see section 12 above) we will suggest these to you as possible solutions.
3.	If your complain requires more detailed consideration or investigation: ▪ we may ask for clarification of certain aspects of the complaint and further details about the outcome you are seeking; and ▪ we will make inquiries of people who can assist us to establish what has happened and why, and generally endeavour to complete our investigation into your complaint promptly (including gathering relevant facts, locating and reviewing relevant documents and speaking with the individuals involved).
4.	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. In most cases we will respond to your complaint within 30 business days from when we receive your complain. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to a complaint, or you consider that we may have breached the Privacy Act (including the Australian Privacy Principles), you are entitled to make a complaint to the Office of the Australian Information Commissioner (the Australian privacy regulator).

The Office of the Australian Information Commissioner can be contact by telephone on 1300 363 992, or you can fill out this form to make a complaint about our handling of your personal information. Full details for the Office of the Australian Information Commission can be found online at https://www.oaic.gov.au/.

14. How are changes made to this Privacy Policy?

We may make changes to this Privacy Policy, with or without notice to you. However, where we make a material change to the Privacy Policy, we will provide notice to you (including by updating our website and, where appropriate, notifying you directly). We recommend you visit this Privacy Policy regularly to keep you up to date with any changes we make.

15. How can you contact us?

If you wish to contact us about your personal information you should contact our Privacy Officer at privacy@hoban.com.au or 03 9203 4900 during normal office hours which are 9:00am-5:00pm Monday to Friday.