

RECRUITMENT AND HUMAN RESOURCES PRIVACY POLICY



INTRODUCTION

This Policy describes how companies within the Link Group ("Link") including but not limited to: Link MS Services Pty Limited, Link Business Services Pty Limited, Money Solutions Pty Ltd, Company Matters Pty Limited, Empirics Marketing Pty Ltd and Synchronised Software Limited ("Company"), which handle personal information in Australia collects, holds, uses and discloses personal information consistent with the *Australian Privacy Act 1988* and the Australian Privacy Principles (**APPs**) in connection with recruitment and other functions managed by Link Group Human Resources.

This Policy also serves as notification to individuals of the matters required to be notified by the Company including APP 5^A.

An individual who provides personal information to Link either directly or through a third party who provides the personal information to Link, is given access to this Policy.

By providing personal information and having access to this Policy, an individual consents to the collection, holding, usage and disclosure of their personal information in accordance with this Policy.

^A Collection of Personal Information

An employer is exempted from complying with the APPs concerning the personal information of its employees and former employees. This Policy is intended to be applied consistent with this Exemption.

APPLICATION

This Policy applies to individuals whose personal information is collected by Link

Individuals to whom this Policy applies include employees (unless the Exemption applies), candidates for employment, temporary workers, labour hire workers, work experience students, interns, secondees from other organisations and contractors who perform work for Link.

This Policy is not incorporated into the terms of engagement or employment of a person to whom it is intended to apply. It may be amended or replaced by Link at any time. This Policy governs the handling of personal information.

PERSONAL INFORMATION COLLECTED BY THE COMPANY

Personal information collected by Link includes but is not limited to: gender; full legal name; home phone and fax numbers; mobile numbers, home postal address; home street address, e-mail addresses; date of birth; driver's licence; marital status; superannuation information; passport number; visa information; residency status

to determine the right of an applicant to work in Australia; photographic and video images; file notes; emergency contact details; pre-employment test results; results of credit checks; bank account details for the payment of salary, wages or other benefits; personal travel preferences; employment history; qualifications; education history, and any other information which may identify an individual in connection with their engagement or possible engagement by Link.

Personal information also incorporates sensitive information. The sensitive information collected by Link may include but is not limited to: tax file number; professional association or trade union membership; dietary requirements and limitations; special prayer or religious leave needs; accessibility and other needs and limitations due to a person's disability; and health information including the existence of a disability and serious medical conditions.

HOW PERSONAL INFORMATION IS COLLECTED AND HELD

Link Group collects personal information from the individual directly and from publicly available sources. Link also collects personal information from third party service providers, other employees of the Company authorised to provide the personal information and people giving references in connection with an individual's potential employment or ongoing engagement.

Personal information received by Link is usually held electronically on the information technology systems of the Company and its service providers. Access is limited to authorised employees, contractors and service providers who require access in connection with the purposes described in this Policy.

Some personal information is held in hard copy form at the Company's premises or stored by third party service providers off site.

IF INFORMATION OR CONSENT IS NOT PROVIDED

Without all of the required personal information and consent being provided by an individual, Link may not be able to engage or continue the engagement of the individual.

PURPOSE OF COLLECTION, USE AND DISCLOSURE

Personal information will be collected, held, used and disclosed for the purposes of:

- facilitating recruitment and engagement; probity and reference checking; pre-employment screening; immigration and related checking;
- facilitating medical checks; arranging training and personal development; facilitating security arrangements at the workplace; complying with Company risk management processes designed to ensure compliance with Company licensing or similar requirements;

- addressing complaints, claims or demands against Link or its service providers; in connection with occurrences that may be covered by Link insurance policies; complying with legal obligations under legislation or to government and other bodies;
- managing Link's information technology systems; establishing access to and use of information technology systems and other communications devices;
- preparing material for marketing and sales purposes; administering payroll and vendor payment systems; facilitating and completing travel and secondment arrangements; processing expense reports for reimbursement purposes;
- management reporting; administering any test or assessment (including medical tests and assessments); complying with legal and stock exchange obligations; audit purposes; obtaining legal and accounting advice; and
- transferring individuals between group companies; outsourcing or in-sourcing services; ensuring compliance with other Link policies; and any related, secondary or ancillary purposes.

If personal information is provided in connection with a person's recruitment for a particular position or role and the individual is not engaged in that role, Link may retain the personal information in connection with other roles which may be offered.

Link will hold personal information for as long as necessary in order to meet the purposes described in this Policy. This will normally be for up to 7 years from the date of collection.

DISCLOSURE OF PERSONAL INFORMATION

Link may disclose personal information to third party service providers to perform activities in connection with the purposes listed in this Policy, the Company's insurers, people who provide references about candidates and government bodies as required or authorised by law.

As Link Group incorporates a number of member companies, then each member of the group may share and access personal information in connection with the purposes described in this Policy. Personal information collected by one Link Group company may also be disclosed to authorised representatives of other Link Group companies. An individual may not be informed of each occasion upon which personal information is shared or accessed by Link Group companies.

Some of the organisations to which Link may disclose personal information are outside Australia. They are located in New Zealand, United Kingdom, France, Germany, USA, Canada, Papua New Guinea, China including Hong Kong Special Administration Region, Philippines, Singapore, United Arab Emirates, India, South Africa and any other country in which the company conducts its business. If an individual acknowledges that they have read this policy (or gives consent to Link's management of their personal information in some other way), then the Company is not required to ensure that the overseas recipient, to which personal information is given, complies with the Australian Privacy Act.

ACCESS TO PERSONAL INFORMATION

An eligible individual may see and have a copy of their personal information that Link holds.

If an individual is able to establish that their personal information is not accurate, complete and up-to-date, then on request Link will take reasonable steps to correct it.

If the Company is unable to agree whether personal information is accurate, complete or up-to-date, then an individual may ask the Company to place with the information a statement claiming that particular information is not accurate, complete or up-to-date.

COMPLAINTS

An individual may make a complaint about how their personal information has been dealt with. If making a complaint, the individual must describe the nature of the complaint and provide sufficient information to enable Link Group to respond.

Link will generally respond in writing to a complaint within 28 days of receipt.

If the complaint remains unresolved, then the individual has the option of notifying the Office of the Australian Information Commissioner.

CONTACT DETAILS

An individual who seeks to exercise their rights of access and correction, or ask questions or make a complaint about privacy may use the following contacts:

In writing:

privacy.officer@linkgroup.com

Post:

Attn: Privacy Officer
Link Group
Locked Bag A14
Sydney South NSW 1235