

## PRIVACY POLICY

Scotford Fennessy is bound by the National Privacy Principles (NPPs) contained by the Privacy Act 1988.

### Collecting Personal Information

We only collect personal information that is necessary to deliver our services, including recruiting and consulting, or that is required for administration, invoicing and networking.

Scotford Fennessy collects personal information about you when you request our services, including first and last name, street address, phone number, email address, tax file number, banking details, next of kin, working visa, opinions and other information that could be used to provide you our recruitment or consulting services. It also includes personal information provided in resumes such as references, education, employment qualifications, memberships and competencies. We collect personal details over the phone, by letter and/or via electronic means. Information is also collected from other parties, e.g., when conducting reference checks.

Scotford Fennessy will not collect or monitor personal information about you without your consent unless we believe it is necessary

- Because it is required by law.
- To provide you a service which you have requested.
- To protect the rights or property of Scotford Fennessy.
- To lessen a serious threat to a person's health or safety.

Personal information will not be knowingly collected from a minor without his or her parent's consent.

Scotford Fennessy will not ask an individual to provide sensitive personal information in a place where other people can overhear.

### Using and Disclosing Personal Information

Scotford Fennessy recognise the trust that individuals place in us when they give us personal information. We will not sell, transfer, assign or rent your personal information. In order to deliver a service you have requested, Scotford Fennessy may sometimes share your personal information with an affiliate, subsidiary, potential employers or third-party service providers from time to time. Such service providers may be located overseas. As part of the outsourcing arrangement with a service provider, they may need access to some of your personal information. Scotford Fennessy take reasonable steps to ensure that terms of service with our service providers recognise that we are bound by obligations under the Privacy Act to protect the privacy of your personal information and that they will not do anything that would cause us to breach those obligations. We will not otherwise disclose your personal information to others without your explicit consent, unless it is required by law.

If an individual indicates they do not want to receive further direct marketing or be contacted for marketing purposes by phone, fax, email, letter or in person, Scotford Fennessy has an effective system in place to record these requests and will action these as appropriate.

Scotford Fennessy reserves the right to disclose an individual's personal information to a responsible person, a close relative or others with a close relationship to that individual where it is necessary to lessen or prevent a serious or imminent threat to the individual's life, health or safety.



### **Keeping Information Accurate, Complete and Up to Date**

While keeping in mind why the information is being collected, Scotford Fennessy takes reasonable steps to make sure that the information is accurate, complete and up-to-date at the time of collection and when used or disclosed.

### **Data Security**

Scotford Fennessy will endeavour to take all reasonable steps to keep information which it holds about individuals secure. Electronic information is stored on a secure server that is protected in controlled facilities. Documents and papers are stored and locked under key until they are no longer required. When electronic information is no longer required it is permanently destroyed. When physical information is no longer required, it is placed in a locked confidential security bin and destroyed or shredded. In addition, our employees and data processors are obliged to respect the confidentiality of any personal information held by us. Procedures are in place such as:

- The need to know principle that limits access to information to those people who need the information to carry out their duties.
- The secure storage of all files after use to reduce the risk of unauthorised access to personal information.

However, Scotford Fennessy will not be held responsible for events arising from unauthorised access to your personal information.

### **Openness About Information Handling Practices**

Scotford Fennessy has prepared and made available its Privacy Policy on request, or on our website at [www.scotfordfennessy.com.au/privacy-policy](http://www.scotfordfennessy.com.au/privacy-policy).

### **Access and Correction**

Personal information that is collected is available for access and correction at any time.

Scotford Fennessy takes reasonable steps to correct information if an individual shows that it is not accurate, complete or up-to-date.

Scotford Fennessy may deny access to some information providing access would have an unreasonable impact upon the privacy of other individuals. Additionally individuals will not have access to employee records.

Before access to personal information is granted to an individual their identity needs to be established. The individual is required to request the information in person or to provide personal details that can be used to identify them.

### **Anonymity**

Wherever it is lawful and practical, individuals will have the option of not identifying themselves when entering into transactions with Scotford Fennessy.

### **Trans border Data Flow**


Scotford Fennessy will only transfer personal information outside Australia if Scotford Fennessy believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the National Privacy Principles.

### **Privacy Undertaking from Scotford Fennessy Employees & Candidates:**

1. I understand and agree that the information I have provided at interview, to Scotford Fennessy, will be used to assess my suitability for employment for the position in question or other positions that arise that may fit my capabilities and qualifications.
2. I understand that information contained in my resume or from interview notes, psychological assessment as well as referee comments, can and/or may be conveyed to prospective employers.
3. I also understand and require that I will be notified before my information is passed to a prospective employer other than the position(s) to which I have applied in this instance.
4. I give permission for my information to be retained by Scotford Fennessy for consideration for future positions.
5. I understand that referees I have provided or will provide may be contacted and information provided by those referees may be used to assist in assessing my suitability for this or other roles.
6. I accept that any information may be transferred overseas for the purpose of seeking a position but only if Scotford Fennessy reasonably believes the information will be granted a
7. Similar level of protection as under the new Privacy Act.
8. I give permission for my information to be shared with selected affiliated recruiting companies, but only with my knowledge and permission.
9. I declare that I have valid Australian work rights and/or the appropriate visa to legally work in Australia. Should there be any changes to this I will inform Scotford Fennessy Immediately.

### **Scotford Fennessy Commitment**

Scotford Fennessy will ensure that your information is kept in secure storage within Scotford Fennessy offices and only disclosed to those parties agreed to by you.

  
NICHOLAS JOHN FENNESSY  
Director

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