



Privacy Policy

Policies and Procedures

Version 2.0
May 2023

Revision history

Any changes to this policy must be authorised by the Directors.

Version	Approval Date
2.0	May 2023

Objective and Scope

Trayne Consulting only collects information that is reasonably necessary for the proper performance of our activities or functions and do so in accordance with the Australian Privacy Principles under the Privacy Act 1988.

This policy explains how we collect, use and disclose the personal information that we collect from you, or which we have obtained about you from a third party. It sets out various rights that we have in relation to that and other personal information.

Policy

1. Collection of Personal Information

Trayne Consulting may collect information about you such as your name, contact details, skills, qualifications, accreditations and your employment history. We may also collect other types of your personal information such as references, police checks and employment objectives during the course of dealing with you, for example if you are considered for a particular employment position. Where practical, the purpose for which we collect personal information and the consequences of not providing it will be made clear at the time of collection.

We may collect information you gave us when:

(a) registering or subscribing to our services or requesting further services on any of our websites;

(b) you contact us to report a problem with our websites or make any enquiry or query or comment; and

(c) you apply online for a job or work with Trayne Consulting, you may need to provide (without limitation) information about your education, employment history, health, criminal history and accreditations. Your application will constitute your express consent to our use of this information, including to access your application and to allow us to carry out any checks, such as reference checking and other related activities as may be required of us under applicable law as an employer.

Trayne Consulting may also collect information from public record and third parties.

2. Use and Disclosure of Personal Information

Trayne Consulting holds, uses and discloses your personal information for the purposes for which we collect it, as well as purposes that are related, where you would reasonably expect us to or otherwise as set out in this Privacy Policy.

We disclose your personal information to our third party suppliers in confidence and in accordance with the law for the purpose of providing our services to you, conducting our business and communicating with you.

We will not use or disclose your personal information for other purposes without first seeking your consent, unless authorised or required by law. Generally, we will use and disclose your personal information for the following purposes:

- (a) to provide our services to you;
- (b) to maintain our business relationship, where you are a user of our website, a client or candidate;
- (c) to enable you to submit your CV generally, to apply for specific jobs or to subscribe to our services;
- (d) to match your coded details with job vacancies, to assist us in finding a position that is most suitable for you and to send your personal information to clients in order to apply for jobs;
- (e) to provide clients with information about you during an assignment or placement, including qualifications, licenses, checks (including sensitive information checks, where you have consented), migration status and other personal information you have provided to us;
- (f) to contact any reference from details provided by you for the purpose of Trayne Consulting placing you with a client;
- (g) to answer your inquiry;
- (h) to direct-market products and services, advise you of news and industry updates, events, promotions and competitions, reports and other information. Where we do so, you will be able to unsubscribe from such communications;
- (i) if Trayne Consulting merges with or is acquired by another business, we may share personal information with the new owners of the business and their advisers and if this happens, you will be sent notice of such an event;
- (j) we may also release personal information to regulatory or law enforcement authorities, if they require us to do so;
- (k) to meet or comply with any legal, regulatory or statutory requirements relating to our provision of products and services and to make disclosure under the requirements of any applicable law, legislation, rule, ruling, regulation, direction, court order, by-law, guideline, circular or code (collectively "laws") applicable to us;
- (l) for research, benchmarking and statistical analysis; and

(m) we may also seek your consent to collect, hold, use and disclose your personal information for any other purpose not listed above.

3. Sharing of Personal Information

While your personal information will be kept confidential, in certain circumstances, it may be necessary for us to provide or disclose your personal information if required for any of the foregoing purposes. Where we do so, we would merely disclose information that is necessary for the purpose of such disclosure.

We may share your personal information with the following categories of persons (who may be located within or outside of Australia), such as entities within the Trayne Consulting including all related companies, our sub-contractors and service or product providers in connection with our products or services; and anybody or person to whom we are compelled or required to do so under any laws or in response to any competent or government, state, provincial, local government, statutory or municipal authority, industry regulators, law enforcement authority, agency or body.

4. Sensitive Information

Sensitive information is a special category of personal information under the *Privacy Act 1988* (Cth). It is the information or an opinion about you, including racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal records and health information.

As part of the services we provide, Trayne Consulting may arrange health surveillance, drug and alcohol testing, medical testing or police checks as required by our clients or legislation. If you are required to provide any of this sensitive information, we will seek your consent first, including your consent to disclose this information to our client where the client requests this.

Where Trayne Consulting needs to collect use and disclose your sensitive information Trayne Consulting will provide the purpose for the collection and it will only be disclosed with your consent.

5. Privacy on Our Website

(a) Submitting Your Curriculum Vitae ("CV") and Applying for Jobs

You may submit your CV to Trayne Consulting via the Trayne Consulting website, either for general consideration by our recruitment consultants for positions as they arise or to apply for a specific advertised job. Once submitted, your CV will be sent directly to the relevant Trayne Consulting recruitment consultant who will review your details and advise you whether you are to be accepted by us for registration on our central database. This database, including your personal information, can be accessed by any of our recruitment consultants working in other offices of the Trayne Consulting, both inside and outside Australia. If you are accepted onto our database, our recruitment consultants should then contact you to set up an interview in person. You can update your CV at any time, simply by following the same procedure to submit a new CV via our websites. Upon submitting your CV, you consent to the information contained therein being shared with our clients for the purpose of considering you for positions, placements or assignments.

6. Security

Trayne Consulting takes reasonable steps to keep personal information secure, accurate and up to date. The Internet is not always a secure method of transmitting information. Accordingly, while we seek to protect your personal information by implementing digital security systems in various parts of our website, Trayne Consulting cannot accept responsibility for the security of information you send to or receive from us over the Internet or for any unauthorised access or use of that information. Where we have links to websites outside the Trayne Consulting, we cannot ensure that your privacy will be protected in accordance with this policy. You should consult these other websites' privacy policies as we have no control over them and are not responsible for any information that is submitted to or collected by these third parties.

7. Website Links

Where we have links to websites outside the Trayne Consulting, we cannot ensure that your privacy will be protected in accordance with this policy. You should consult these other websites' privacy policies as we have no control over them and are not responsible for any information that is submitted to or collected by these third parties

8. Access to Personal Information

You may request access to or update or to delete your personal information held at Trayne Consulting by contacting one of the Trayne Consulting Managing Directors as set out on our website. We may ask to verify your identity and for more information about your request. Where we are legally permitted to do so, we may refuse your request and give you reasons for doing so. Where you request your personal information to be updated and there is a dispute about the facts, we will make a note on your personal information of such dispute. If you have created an account with Trayne Consulting via our website, you are able to view and update any information by logging into your account.

You may also request that Trayne Consulting stops using your information and contacting you and we will comply with your request (for example if at any time you would prefer to stop receiving newsletters and updates from us, please use the "unsubscribe" option included in the email or other material). However, if this involves a request for deletion of your file, please be aware that we may not be required or able to do so, particularly where your file also holds information about our clients. We reserve the right to charge an administrative fee for access and updating requests.

9. Complaint

At Trayne Consulting we aim to acknowledge receipt as soon as possible and commit to resolve all complaints no later than 30 days. However, there may be instances where this is not possible due to the contents of the complaint. In such circumstances, we will respond to your complaint in a reasonable and practical time. You may wish to contact the Australian Information Commissioner (Oaic) if you are not satisfied with our response to your complaint.

10. Changes to this Privacy Policy

Please note that this Privacy Policy will regularly be updated to reflect any changes in the way we handle your personal information or any changes in applicable laws.