

FaceCruit Privacy Policy

FaceCruit is bound by the National Privacy Principles (NPPs) under the *Privacy Act 1988 (Cth)* (“**Privacy Act**”).

FaceCruit takes these obligations seriously and has adopted policies and procedures to ensure that all personal information is dealt with in accordance with the Privacy Act.

The FaceCruit Privacy Policy explains the approach adopted by FaceCruit in relation to the collection and handling of personal information.

1. **Consent**

- 1.1 By using the FaceCruit website at www.facecruit.com (“**the Website**”) and any of the services provided by FaceCruit as outlined in the Terms of Use (“**the Services**”) you consent to the FaceCruit Privacy Policy. If you do not agree with the FaceCruit Privacy Policy, you may not use the Website or make use of the Services. Information gathered through the Website may be transferred, used, and stored by FaceCruit, its agents, and users of the Website and the Services.
- 1.2 If you access the Website and use the Services you consent to the use of your personal information.

2. **Why is Personal Information Collected?**

- 2.1 FaceCruit collects personal information to conduct its business, and to provide and market the Services.
- 2.2 FaceCruit’s Services have been established with a dual purpose:
 - 2.2.1 to facilitate employers to find employees or contractors; and
 - 2.2.2 to provide individuals with the opportunity to market themselves for employment.
- 2.3 FaceCruit collects personal information about you through the Website.
- 2.4 Employers who use the Website will use personal information provided by individuals to consider whether they are suitable for positions within their organisation.
- 2.5 If personal information is not provided, FaceCruit may not be able to supply the Services.

3. **What Personal Information is Collected?**

- 3.1 The type of information FaceCruit may collect and hold includes personal information about you, and any person or business who attempts to use the Website and the Services.
- 3.2 The nature of the information FaceCruit may collect in order to provide the Services includes personal information submitted through the Website, which information can be used to identify you, and includes but is not limited to:
 - 3.2.1 names
 - 3.2.2 addresses
 - 3.2.3 contact details
 - 3.2.4 employment history
 - 3.2.5 tax details
 - 3.2.6 medical history
 - 3.2.7 financial information
 - 3.2.8 family details, eg next of kin
 - 3.2.9 criminal record/prior convictions
 - 3.2.10 ethnic origin
 - 3.2.11 religion
 - 3.2.12 trade union details
 - 3.2.13 government agency identifiers
- 3.3 Personal information also includes your image, photographs and voice recordings, work history, knowledge, skills, abilities, resume data, work style and answers to interview questions.

4. **How your Personal Information is Used and Disclosed?**

- 4.1 FaceCruit may use and disclose your personal information for the primary purpose for which it is collected, for reasonably expected secondary purposes, which are related to the primary purpose and for any other purpose authorised by the Privacy Act.
- 4.2 In general, FaceCruit will use and disclose your personal information for the following purposes:
 - 4.2.1 conducting its business;

- 4.2.2 providing and marketing the Services;
 - 4.2.3 communicating with you;
 - 4.2.4 complying with its legal obligations;
 - 4.2.5 helping to manage and enhance the Services.
 - 4.2.6 to service providers and other agents engaged to perform functions on its behalf such as processing of payments, provision of data storage, hosting of the Website, marketing of FaceCruit's Services, conducting audits and performing web analytics.
- 4.3 The relevant organisations that FaceCruit may disclose your personal information to are those involved in:
- 4.3.1 managing, validating or administering your application, employment or engagement such as third party suppliers, users of the Website, organisations providing education and training, professional associations, posting services and advisers;
 - 4.3.2 your employment or engagement such as employment agencies, counsellors and assessment agencies;
 - 4.3.3 conducting checks or monitoring employee conduct.
- 4.4 The Website and the Services may provide links to third party sites, such as the websites of interviewing or training companies. FaceCruit is not responsible for the privacy policies, practices or the content of websites owned by others that you may link to through the Website or that may be linked through the Services. Accordingly you are encouraged to review the privacy policies and terms of service of linked websites so that you understand how those websites collect, use and share personal information.
- 4.5 FaceCruit operates throughout Australia and overseas, therefore some of the uses and disclosures may occur outside your State or Territory.

5. **Who else might see your Personal Information?**

- 5.1 FaceCruit may disclose your personal information to:
- 5.1.1 other members of the FaceCruit group;
 - 5.1.2 other companies or individuals who assist FaceCruit in providing the Services or who perform functions on its behalf, such as specialist consultants;
 - 5.1.3 government or regulatory authorities;

- 5.1.4 legal advisers and other professional service bodies that FaceCruit uses from time to time.

6. **How is Personal Information kept Accurate?**

- 6.1 It is the responsibility of each user of the Website and the Services to ensure the personal information FaceCruit holds about you on the Website is up to date in order for the Services to benefit you.

7. **Management of Personal Information**

FaceCruit takes:

- 7.1 the NPPs seriously and ensures reasonable steps are taken to protect the security of personal information. FaceCruit's personnel are required to respect the confidentiality of personal information and the privacy of individuals.
- 7.2 FaceCruit takes reasonable steps to ensure only authorised persons are given access to the Website which holds your personal information.
- 7.3 FaceCruit has implemented security measures to protect the personal information on the Website from;
 - 7.3.1 misuse;
 - 7.3.2 unauthorised access;
 - 7.3.3 improper use;
 - 7.3.4 unauthorised modification;
 - 7.3.5 improper disclosure; and
 - 7.3.6 unlawful destruction or accidental loss.

8. **Archiving**

- 8.1 When you no longer use the Website, your information may be stored for a period of time.
- 8.2 Where FaceCruit no longer requires your personal information for a permitted purpose under the NPPs it will take reasonable steps to destroy it.

9. **Identifiers**

- 9.1 FaceCruit does not use personal identifiers that have been assigned to you by another agency, eg your tax file number, as a means of identifying you as an individual. If you provide such information to

for a particular purpose, it will not be used for any other purpose but for that for which it was provided.

10. **Trans border Data Flows**

10.1 FaceCruit may transfer personal information about you to someone who is in a foreign country only if you consent to the transfer or the transfer is necessary in order to perform the Services.

10.2 International Data Transfers

We are subject to the provisions of the General Data Protection Regulations that protect your personal data. Where we transfer your data to third parties outside of the EEA, we will ensure that certain safeguards are in place to ensure a similar degree of security for your personal data. As such:

10.2.1 We may transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or

10.2.2 If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place; or

10.2.3 Where we use certain service providers who are established outside of the EEA, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe.

11. **Sensitive Information**

11.1 Some personal information that is collected may be sensitive, and might include information relating to racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, criminal record, and health information.

11.2 Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise or where certain other limited circumstances apply such as where it is required by law.

12. **Access to Your Personal Information**

12.1 Subject to the exceptions set out in the Privacy Act, you may gain access to your personal information from FaceCruit's privacy officer by sending a request to privacy@facecruit.com

12.2 FaceCruit will require you to verify your identity and to specify what information you require.

12.3 Access will be provided within a reasonable time.

12.4 An administration fee may be charged for providing access.