

Privacy Policy

This Privacy Policy provides general information about how The Recruitment, Consulting & Staffing Association Limited ("RCSA", "our", "us" or "we") ACN 078 606 416 / NZBN 9429038043338 collects and handles personal information consistently with the requirements of the *Privacy Act 1988* (Cth) the ("**Act**"), the Australian Privacy Principles ("**APP**"); the New Zealand *Privacy Act 2020*, and alternative privacy laws, where they apply to us.

This Policy does not cover personal information about RCSA employees.

For the purpose of this Privacy Policy, the term **personal information** means information or an opinion, whether true or false, recorded in a material form or not, about an identified individual or reasonably identifiable individual.

This Privacy Policy explains how RCSA collects, uses, discloses and otherwise processes or controls personal information. It also explains the process of how you may request access to, and correction of, personal information we hold about you, or complain about any suspected breach of privacy.

RCSA will only collect personal information where it is reasonably necessary in order to carry out one or more functions or activities.

1. Who do we collect information about

RCSA may collect and hold the personal information from:

- Members and prospective members;
- customers and prospective customers;
- participants in our events, training and education programs;
- partners and supporters;
- subscribers and third parties; and
- participants in RCSA led programs or programs for which RCSA provides concierge or similar services.

2. What information may we collect

RCSA collects and holds personal information. This information of an individual may include:

- Name
- Personal and/or business contact details
- Details of employer
- Details of position and employment history (including CV/resume and/or LinkedIn profile)
- Details of any academic and/or Continuing Professional Development courses
- Details of any professional memberships
- Credit/debit card or other payment details (temporarily)
- Name and contact details of any referees
- Details of any specific dietary or mobility requirements
- Details of any travel and accommodation bookings

- Details relevant to participation in a labour market initiative program – e.g. details of eligibility, work history, skills, qualifications and aptitude, placements or representation by a recruitment or staffing agency.

3. Credit/Debit Card and other payment details

When RCSA collects credit/debit card or other payment information, this information will be redacted. RCSA will not store this information.

4. How we collect and use personal information

RCSA will use the personal information it collects and holds primarily for the following reasons:

- Offering of member benefits, products and services
- Reviewing member and non-member interests to better understand and meet requirements of existing and prospective members
- Delivery of information and targeted marketing communications to existing and prospective members, supporters and subscribers
- Registration for conferences and events
- Analysing member and non-member interests in relation to training and events
- Professional recognition and accreditation, including recording CPD units
- The conferring of prizes and awards
- Assessing suitability and performance regarding appointments to RCSA Board, committees and working groups
- Lobbying and advocacy
- Grievance investigation including disciplinary and counselling activities, and arbitration
- Insurance
- To help us improve our benefits and services to Members and the public
- To meet the requirements, including audit, monitoring and validation requirements of RCSA led programs or programs for which RCSA provides concierge or similar services.

RCSA collects this information in various ways including membership, supporter subscriber and program participant applications, registrations, enrolments and renewal forms, and via RCSAs Professional Conduct Grievance Intervention Guidelines (PCGIG) and processes including via Grievance Intervention Request forms and investigations.

This information may be held in various forms including email, telephone records, letters, registrations to events, webinars, survey information, award nominations, application forms, records of mentoring, training and CPD program participation, digitised data collected for example via web portals and apps and held in spreadsheets and databases.

RCSA may also collect and handle personal information for other reasons explained at the time of collection, or which are required or authorised by, or under law, as appropriate, including privacy legislation in Australia and New Zealand.

5. Contracted Service Provider

From time to time, RCSA acts as a contracted service provider to government agencies. In such cases, different or additional privacy laws may apply to the way we handle your information. We will usually inform you about that in a collection notification given before, or as soon as is practicable after, we collect your personal information.

6. Indirect Collection

In some cases, when it is necessary to collect personal information to support a labour market initiative program, it may be more practicable for RCSA to collect personal information from a recruitment & staffing agency or another third party. In such cases, we may ask the agency to ensure that the individual receives RCSA personal information collection notification before, or as soon as is practicable after, the collection of personal information.

7. Marketing and Communications (General)

Except where we collect personal information as a contracted services provider supporting a labour market initiative program, RCSA will use personal information it collects and holds to provide information to members, non-members, supporters and subscribers about member benefits, products and services. Where appropriate, the products and services may also extend beyond those offered by RCSA that may be of interest or benefit and may include benefits, facilities, products and services offered by RCSA's sponsors, suppliers and other business partners.

RCSA provides the option for individuals to opt-out of receiving marketing material in all forms of communication including letters and/or email by writing to RCSA's Privacy Officer and/or using the unsubscribe function included in electronic communications.

8. Marketing and Communication (Contracted Services Provider for Labour Market Initiatives)

If we collect personal information as a contracted services provider supporting a labour market initiative program, RCSA will use and disclose it only for the purposes related to the program and not for general marketing and communications purposes.

9. Disclosure of Personal Information

RCSA may disclose (share) personal information with third parties. These may include mailing houses, printing companies, IT services, event and conference organisers, recruitment and staffing agencies participating in any labour market initiative program in which individuals are also participating, and government agencies with whom RCSA have entered into contracted services provider arrangements. RCSA will take the appropriate steps to ensure, so far as is practicable, that any third party individuals, contractors, business or agencies:

- are made aware that they are authorised only to use personal information for the purpose it has been provided to the third party to provide the product and/or services, as is required by RCSA, or in the case of an event or conference, for the facilitator to perform their role at that event; and
- comply with applicable privacy laws when they handle personal information, or comply to a comparable standard with legislated privacy safeguards in Australia and New Zealand.

From time to time, if RCSA are not restricted from doing so by contracted services provider obligations, RCSA may send personal information overseas. Some service providers are located in other countries including the US, UK and Singapore. Where we use a service provider that hosts personal information in other countries, RCSA takes steps that are reasonable in the circumstances to ensure that the host does not breach the Australian Privacy Principles or New Zealand Privacy Act.

As stated above, RCSA may also disclose personal information where required or authorised by, or under law, as appropriate and in accordance with privacy legislation in Australia and New Zealand in relation to or connection with law enforcement activities by enforcement or statutory bodies. These may include Federal and State Government Departments in Australia, for example, Fair Work Australia; and Government Departments and Agencies in New Zealand, for example, the Ministry of Business, Innovation & Employment.

RCSA does not rent or sell personal information to any third parties.

10. Security of Personal Information

RCSA holds and stores personal information in several ways, including emails and email contact lists, electronic databases and in paper files, which are locked away where appropriate. In addition, RCSA also stores archived files in boxes, which are then stored offsite in secured facilities. All personal information is retained in accordance with statutory requirements and then securely destroyed when no longer required for any purpose for which it may be used or disclosed, or for which it must be retained by law.

Payment security for financial transactions is maintained by using iMIS (Customer Relationship Management database), EZYPAY (direct debit payment processor) and Global Payments Ezidebit (electronic payment gateway). All financial transactions are processed securely to ensure payment details are appropriately protected. Credit card information is not stored by RCSA. All records of financial transactions are retained in accordance with statutory financial requirements and then securely destroyed.

RCSA ensures all personal information is securely held. This includes secure lockable cabinets, secure office access and for the purpose of Information and Communications Technology, the use of firewalls, anti-virus software, username (login) and password protection, encryption and workplace policies. It is also a condition of employment that all RCSA staff, volunteers and contractors maintain the confidentiality of all personal information.

11. Website

When visiting RCSA websites, whether it is to register for an event, access or download from RCSA websites, which includes the use of our products, templates and services, RCSA may collect personal information.

RCSA and its service providers use web analytics in order to collect a range of information about individual interactions with RCSA websites. The web analytic software will collect the information using various techniques and these will include first and third party cookies and Java Script.

RCSA collect such information as the IP address and date and time of the visit, as well as any web pages visited and the time spent on each page. RCSA will use this information to help evaluate the effectiveness of RCSA websites, the level of interest in particular pages, including events and resources, gather broad demographic information, and to help improve the content.

RCSA's websites contain links to other sites for which RCSA is neither responsible for, nor has any control over. RCSA is not responsible for the privacy practices or policies of those sites and RCSA suggest that individuals review the relevant privacy policies and collection notifications of those other sites.

12. Email

When communicating with RCSA by email, the email address used will be logged and recorded automatically by RCSA's email system for the purpose of replying to your email.

For normal communication with members RCSA will use the email address provided to RCSA in membership applications, unless advised otherwise.

As with RCSA's website, when RCSA send an email or any other electronic message, RCSA will log and record information about an individual's interactions with the email including when and where the email was opened or when links contained within the email were clicked on. RCSA do this to better understand what information is of interest and benefit to individuals, and to improve the content.

13. Social Media

RCSA uses social media including, but not limited to, Facebook, LinkedIn, Instagram and Twitter to communicate with members, non-members, supporters and subscribers. RCSA also use social media to promote member benefits and services including events. Where appropriate, RCSA will record details of a topic or post discussed by an individual, including their name, in order to further discuss the matter offline. Please note social media services collect, hold, use and manage personal information for their own purposes and requirements. Social media websites will have their own privacy policies and we would encourage individuals to view these if there are any concerns.

14. Access, Correction and/or Deletion of Personal Information

Individuals have the right to request access to personal information RCSA have collected and hold about them. Subject to any lawful reason not to, RCSA will provide access to the personal information we hold and allow information to be corrected.

To ensure RCSA do not disclose personal information to the wrong person, RCSA will ask individuals to verify their identity. If their identity cannot be verified, we may not be able to provide access to personal information.

RCSA will take all reasonable steps to correct personal information collected and held about an individual, if RCSA are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading. This extends to third parties that RCSA have provided your personal information to unless it is impracticable or unlawful to do so.

Upon request, RCSA will consider deleting all personal information from records. Subject to any lawful requirement not to, RCSA will do their utmost to delete or de-identify personal information if it is no longer required for any purpose for which it may be used or disclosed.

RCSA may refuse access or deletion if it would interfere with the privacy rights of other persons or if it breaches any confidentiality that attaches to that information.

If, for any reason, RCSA do not allow access to an individual's personal information or refuse to correct the information collected and held about an individual, or refuse to delete personal information on request, RCSA will inform the individual as to why. The individual, may, of course, request that RCSA include a note of the request to correct any personal information alongside the information that is believed to be inaccurate.

15. Making a Complaint

Should an individual have a query, concern or complaint in relation to RCSA's handling of personal information, or any breaches of privacy, please write to RCSA's Privacy Officer with details of your complaint:

Privacy Officer
Recruitment, Consulting & Staffing Association
PO Box 291
Collins Street West
Victoria 8007

Email: info@rdsa.com.au

RCSA take all privacy concerns seriously and will endeavour to acknowledge requests within two business days and respond to complaints, in writing, within 30 days of receipt. If the personal information sought has been archived and is held offsite in secure storage, the individual should also anticipate that it may take longer for RCSA to process your application for access so that

RCSA can retrieve the information from storage and review it in order to determine which information may be provided.

Please note RCSA might impose a moderate administration charge for the cost of accessing any personal information held offsite in secure storage facility.

If an individual is unsatisfied with RCSA's response or the matter remains unresolved, the matter can be referred to:

Australia

Office of the Australian Information Commissioner
Level 3, 175 Pitt Street
Sydney NSW 2000
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Web: www.oaic.gov.au

Or

New Zealand

Privacy Commissioner in New Zealand
PO Box 10-094, The Terrace, Wellington 6143
Phone: 0800 803 909 (from within New Zealand)
Email: enquiries@privacy.org.nz
Web: www.privacy.org.nz

Or

Via any additional or alternate means RCSA may have specified in a collection notification.