



Reeds Consulting Pty Ltd Privacy Collection Notice

This Collection Notice sets out the matters described in Australian Privacy Principle (APP) 5.2 (as part of the Privacy Act 1988 (Cth)) as they relate to Reeds Consulting Pty Ltd and its Related Bodies Corporate, as that term is defined in the Corporations Act 2001 (Cth) (together and separately (as appropriate), the Company, we, us, our), when we collect personal information about you.

1 Purpose of Collection

We collect your personal information primarily to:

- undertake recruitment operations;
- provide the Company's services to you;
- suggest products and services to you;
- manage the Company's relationship with you or your business;
- administer and manage the Company's services;
- promote and market the Company's services;
- research, develop and improve the Company's services;
- verify individual identity;
- make changes to a profile;
- respond to any queries or feedback provided; or
- conduct appropriate checks for credit worthiness and for fraud.

Personal information is never shared, sold, rented or otherwise disclosed outside the Company (save for any statutory or legal requirement or if it is first de-identified and aggregated) in ways different from what is described in this Privacy Policy.

Direct Marketing

We may use your name, email address, organisation details, your position within your organisation and any preferences in relation to marketing that you share with us, for direct marketing purposes. Where possible, we will provide you with a choice to unsubscribe from any of our marketing communications. We will respect your request to decline to receive these marketing communications.

2 Type of personal information collected and consequences if personal information is not collected

Generally speaking, we may collect the following information about you:

- name;

- date of birth;
- personal and business addresses, email address, telephone number and other contact details;
- bank account details;
- details of the services we have provided to you or that you have enquired about, including any additional information necessary to deliver those services and respond to your enquiries; and
- details about you to assist in managing our relationship with you.

If you are a prospective employee, we may collect details about your employment history and other details about you to assist with the recruitment process. We may collect this information from you directly, or from a recruiter.

If you are a corporate client, we may collect personal information about the business that you represent.

For each visitor to our Website, we may also collect the following non-personally identifiable information using third party website analytics providers:

- browser type, version and language;
- operating system;
- pages viewed while browsing the Website; and
- page access times and referring website address.

If you do not provide the necessary personal information, we may not be able to provide you with the products, services or information that you have requested from us.

3 **How we collect personal information**

We aim to collect personal information only if it is reasonably necessary to providing the service, product or information you have requested from us.

The Company may collect this personal information in many different ways, including:

- when you or your business applies for an account with the Company;
- when you engage with the Company in the course of receiving services from us or enquiring about our services;
- when you contact the Company with an enquiry or complaint;
- when you participate in our marketing activities (including by subscribing to receive newsletter or information from the Company);
- when you or your business supplies goods or services to the Company;
- in relation to prospective employees from LinkedIn Recruiter or when you apply, or have your personal details forwarded to the Company, for an employment opportunity with the Company;;
- from credit reporting agencies or organisations that have been nominated as trade references; and
- through the Company's website (www.reedsconsulting.com.au) (**Website**).

Unless it is unreasonable or impracticable to do so, we collect your personal information from you directly. In some cases however, we will collect information about you from a third party. For example, ASIC, or if you are a prospective employee, LinkedIn Recruiter.

At the time of collection, or as soon as practicable after we have collected it, we will take such steps as are reasonable in the circumstances to notify you of the collection and of any matters relevant to the collection, unless it is obvious from the circumstances that you would know or would expect us to have the information.

4 **Sharing of your personal information**

In some instances, the company may disclose personal information to organisations outside the Company, such as:

- credit providers and credit reporting agencies for credit-related purposes such as credit history;
- outsourced service providers who are involved in the services we provide to you including mailing, marketing and research activities;
- other businesses involved in our business, including our business partners and third parties that refer you to us; and
- the Company's professional advisors, including its accountants, auditors and lawyers.

We may disclose your personal information to these third parties so that they can assist us with providing the best possible service to you.

Those third parties will be permitted to access only the personal information they need to deliver the service to the Company or to you.

Unless you or your company is located overseas, we are not likely to disclose information to overseas recipients unless it is with your consent, or the disclosure is required or authorised by law.

5 **Privacy Policy**

The Company understands that you value your privacy and wish to have your personal information kept secure. For these reasons, we place a high priority on the security of the personal information that we hold. The Company has developed a Privacy Policy to inform you of how we manage your personal information and maintain its integrity and security.

The Company's Privacy Policy is available for you to access on our website and can be accessed here [\[hyperlink\]](#).

Our Privacy Policy contains information about how you may access the personal information that we hold about you and seek the correction of such information, if you believe it to be incorrect.

The Privacy Policy also contains information about how you may complain about a breach of the APPs and how we will deal with such a complaint.

6 **Contact Us**

Our contact details in respect of any matters in relation to privacy are:

Telephone	03 8660 3000
Email	privacy@reedsconsulting.com.au
Post	Privacy Officer

Reeds Consulting Pty Ltd
GPO Box 2240
Melbourne, Vic, 3001



Privacy Policy.

Purpose and Scope

Reeds Consulting Pty Ltd ACN 076 620 801 (which, for the purpose of this Privacy Policy includes any of its Related Bodies Corporate, as that term is defined in the *Corporations Act 2001 (Cth)*) (**the Company, we, us, our**) is bound by the *Privacy Act 1988 (Cth)* (**Privacy Act**), and the Australian Privacy Principles (**APPs**) in relation to the personal information that we collect and hold. You can find out more information about the Privacy Act and the APPs at the Office of the Australian Information Commissioner's website at www.oaic.gov.au).

This document details the practices the Company has adopted to protect your personal information.

By providing personal information to us, you are taken to have read, and consent to the collection, use disclosure and handling of your personal information in accordance with this Privacy Policy.

Policy and Guidelines

What is Personal Information and what kind of personal information does the Company collect?

Personal information has the meaning given to that term in the Privacy Act and includes information or opinions about an identified individual, or an individual who is reasonably identifiable, whether true or not, no matter how the information or opinions are recorded.

This Policy applies to acts and practices of the Company which relate directly to the personal information the Company collects about clients, suppliers, contractors, agents, prospective employees and employees of its corporate clients, contractors, agents and suppliers.

Generally speaking, we may collect the following information about you:

- name;
- date of birth;
- personal and business addresses, email address, telephone number and other contact details;
- bank account details;
- details of the services we have provided to you or that you have enquired about, including any additional information necessary to deliver those services and respond to your enquiries; and
- details about you to assist in managing our relationship with you.

If you are a prospective employee, we may collect details about your employment history and other details about you to assist with the recruitment process. We may collect this information from you directly, or from a recruiter.

If you are a corporate client, we may collect personal information about the business that you represent.

For each visitor to our Website, we may also collect the following non-personally identifiable information using third party website analytics providers:

- browser type, version and language;
- operating system;
- pages viewed while browsing the Website; and
- page access times and referring website address.

When and how does the Company collect personal information?

We aim to collect personal information only if it is reasonably necessary to providing the service, product or information you have requested from us.

The Company may collect this personal information in many different ways, including:

- when you or your business applies for an account with the Company;
- when you engage with the Company in the course of receiving services from us or enquiring about our services;
- when you contact the Company with an enquiry or complaint;
- when you participate in our marketing activities (including by subscribing to receive newsletter or information from the Company);
- when you or your business supplies goods or services to the Company;
- in relation to prospective employees from LinkedIn Recruiter or when you apply, or have your personal details forwarded to the Company, for an employment opportunity with the Company;
- from credit reporting agencies or organisations that have been nominated as trade references; and
- through the Company's website (www.reedsconsulting.com.au) (**Website**).

Unless it is unreasonable or impracticable to do so, we collect your personal information from you directly. In some cases however, we will collect information about you from a third party. For example, ASIC, or if you are a prospective employee, LinkedIn Recruiter.

At the time of collection, or as soon as practicable after we have collected it, we will take such steps as are reasonable in the circumstances to notify you of the collection and of any matters relevant to the collection, unless it is obvious from the circumstances that you would know or would expect us to have the information.

What does the Company do with the information?

Personal information may be used to:

- undertake recruitment operations;
- provide the Company's services to you;
- suggest products and services to you;
- manage the Company's relationship with you or your business;
- administer and manage the Company's services;

- promote and market the Company's services;
- research, develop and improve the Company's services;
- verify individual identity;
- make changes to a profile;
- respond to any queries or feedback provided; or
- conduct appropriate checks for credit worthiness and for fraud.

Personal information is never shared, sold, rented or otherwise disclosed outside the Company (save for any statutory or legal requirement or if it is first de-identified and aggregated) in ways different from what is described in this Privacy Policy.

If you do not provide the Company with certain personal information about you, the Company may not be able to provide the services or information requested or that you require.

Direct Marketing

We may use your name, email address and telephone number for direct marketing purposes. Where possible, we will provide you with a choice to opt-out of any of our marketing communications. We will respect your request to decline to receive these marketing communications.

Prospective Employees / Job Applicants

Information Collected

The Company collects personal information from job applicants and prospective employees when considering whether to make offers of employment or for employment purposes. A failure by an applicant to provide any lawfully requested information may result in the processing of the application being delayed or may result in the application being unsuccessful. Any information which is provided by a job applicant which is later found to be false, may result in the persons' application being unsuccessful or if the person is employed, result in the termination of that person's employment.

Unsuccessful Applications

If a job applicant applies for a job and their application is unsuccessful, we will retain the application for consideration for other positions which may arise from time to time, unless you ask us not to do so.

Access to and Correction of Personal Information

Subject to any agreed or lawful exceptions, a job applicant has a right to:

- access and copy their personal information which is held by the Company; and
- correct any incorrect personal information held by the Company about the applicant.

Complaints

If you have a complaint about the Company's privacy practices (including a breach of the APPs) you should contact the Company's Privacy Officer at the details set out below.

In your complaint, please set out the details of your complaint and your contact details. Our Privacy Officer will contact you to acknowledge your request and ask for any other applicable information. Our Privacy Officer will then investigate the issue and advise you in writing of the outcome.

You can also make a complaint to the Office of the Australian Information Commissioner. Further information is available at www.oaic.gov.au.

Security of Personal Information

We may hold your personal information in electronic or hard copy form.

The Company takes reasonable steps to maintain the security and integrity of personal information that it holds from misuse, interference and loss, as well as from unauthorised access, modification or disclosure. We use a number of physical, administrative, personnel and technical measures to protect your personal information.

We will retain your personal information as required by law, and then take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed.

Disclosure of Personal Information - Third Parties

In some instances, the company may disclose personal information to organisations outside the Company, such as:

- credit providers and credit reporting agencies for credit-related purposes such as credit history;
- outsourced service providers who are involved in the services we provide to you including mailing, marketing and research activities;
- other businesses involved in our business, including our business partners and third parties that refer you to us; and
- the Company's professional advisors, including its accountants, auditors and lawyers.

We may disclose your personal information to these third parties so that they can assist us with providing the best possible service to you.

Those third parties will be permitted to access only the personal information they need to deliver the service to the Company or to you.

Unless you or your company is located overseas, we are not likely to disclose information to overseas recipients unless it is with your consent, or the disclosure is required or authorised by law.

The privacy and collection practices of entities to which we disclose personal information are governed by their own privacy policies and collection notices.

We will not otherwise disclose information about you unless the disclosure:

- is required or authorised by law; or
- you have consented to our disclosing the information about you.

Change in control of the Company

If we sell or otherwise transfer part or the whole of the Company or our business to another organisation (including in the course of a transaction like a sale, merger or acquisition or as part of a dissolution, liquidation, administration, receivership or other form of insolvency), you agree that your personal information that is collected by the Company may be disclosed to a third party, prospective buyer, transferee or insolvency practitioner and that this is reasonable to enable that party to continue or manage the business.

Quality of your personal information

The Company aims to ensure that your personal information is accurate, complete and up to date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested and properly update the information to us to keep it true, accurate, current and complete. If you believe that the information we hold is inaccurate or incomplete, please contact us and we will use all reasonable efforts to correct the information. If we do not believe the information to be incorrect, we will take reasonable steps to add a statement to the information claiming that you believe the information is inaccurate, incomplete, out of date.

Access to and correcting Personal Information

Subject to exceptions allowed by law, if personal information changes (such as address), or if you would like the Company to no longer keep personal information on file, the Company will endeavour to provide a way to correct, update or remove those records, unless there is a lawful reason for refusing your request.

If access to personal information is required, a written request must be made to the Privacy Officer. The Company will respond to your request within a reasonable time.

If you believe for any reason that the Company is holding inaccurate or incomplete information, a request may be made to correct it. It will be required that the request is in writing for security reasons and addressed to the Privacy Officer. Every request will be reviewed and considered and a subsequent written response from the Company will sent to the person making the request within a reasonable time.

If the Company refuses your request it will give you a written notice explaining our reasons for that refusal and how you may complain about that refusal.

Changes to this Privacy Policy

The Company may amend and vary this policy from time to time for any reason. We will publish any updated Privacy Policy on our Website.

Contacting us

If you have any questions about this Privacy Policy or our privacy practices, would like to make a complaint or request access to or correction of your personal information, please contact us by any of the following means.

Our contact details in respect of any issues in relation to privacy are:

Telephone 03 8660 3000
Email privacy@reedsconsulting.com.au
Post Privacy Officer
Reeds Consulting Pty Ltd
GPO Box 2240
Melbourne, Vic, 3001

BOARD OF DIRECTORS

REEDS CONSULTING PTY LTD

Authorised by: M Cheriyan, Financial Controller and Business Operations Officer

Signature:

Date:

 16/10/2019