1. About this policy

The Skillset Board of Directors and employees are committed to providing you with the highest quality service which includes maintaining strict confidentiality in relation to client records, application records, and any other documents of a personal nature.

The Privacy Act 1988 requires entities bound by the Australian Privacy Principles to have a privacy policy that embodies the 13 National Privacy Principles established under the Federal Privacy Law.

This privacy policy outlines the personal information handling practices of Skillset Limited (referred to as "Skillset", "us" or "we").

This policy is written in simple language. The specific legal obligations of Skillset when collecting and handling your personal information are outlined in the Privacy Act 1988 and in particular, in the Australian Privacy Principles found in that Act. We will update this privacy policy when our information handling practices change. Updates will be publicised on our website and Policy & Procedure Manual.

2. Overview

This policy aims to ensure any information gathered by Skillset is secure and confidential, disposed of appropriately, and that business processes are consistent with the Australian Privacy Principles.

This policy has been created to ensure that Skillset:

- Treats as confidential all client and candidate information;
- Complies with all legal, statutory and Government requirements and abides by the requirements of our employment agent licence;
- Limits the use of any information obtained from clients or candidates to business purposes only;
- Protects the anonymity of clients or candidates until clearance for disclosure is obtained.

We collect, hold, use and disclose personal information to carry out functions or activities as a Group Training Organisation, Recruitment & Work Placement provider, College, and Environmental & Sustainability service provider.

These functions and activities may include:

- work placement operations or recruitment functions
- client and business relationship management
- marketing or communicating services to you
- to confirm identity and authority to provide references
- statistical purposes and statutory compliance requirements

3. Collection of your personal information

At all times we try to only collect the information we need for the particular function or activity we are carrying out. The main way we collect personal information about you is **when you give it to us,** for example, we may collect personal information such as name, contact details, current employment details, education history, work history, resume, reference details and referee feedback when you:

- submit your information to us electronically or in person
- contact us to ask for information (but only if we need it)

We may also collect contact details and some other personal information if you are participating in a meeting or consultation with us.

You do not have to provide us with Personal Information but, if you do not provide the information we request, we may not be able to assist you fully to our capability.

Collecting sensitive information
Sometimes we may need to collect sensitive information about you. This might include information about your health, race or ethnic origin, association memberships, criminal history information.

Indirect collection
We may collect information from third parties and publicly available sources when it is necessary for a specific purpose such as checking information that you have given us or when you have consented or would reasonably expect us to collect your personal information in this way. For further information refer to Social Networking Services in this policy.

Collecting through our websites
Where our websites allow you to make comments or give feedback, we collect your email address and sometimes other contact details. We may use your email address to respond to your feedback. We may store this personal information on servers located in Australia and offshore via cloud.

Analytic, session and cookie tools
We use a range of tools provided by third parties, including Google to collect or view website traffic information. These sites have their own privacy policies. We use the information to maintain, secure and improve our websites and to enhance your experience when using them. In relation to Google Analytics you can opt out of the collection of this information using the Google Analytics Opt-out Browser Add-on.

Social Networking Services
We use social networking services such as LinkedIn, Facebook, Twitter and YouTube to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These sites have their own privacy policies.

Email lists
We may collect your email and, if you provide it, other contact details when you subscribe to our email lists. We only use this information for the purpose of communicating with you, and to administer the lists.

4. How your personal information is held

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium.

We hold personal information in a combination of secure computer storage facilities and other records, and take such steps as are reasonable in the circumstances to protect the personal information we hold from misuse, interference and loss, unauthorised access, modification or disclosure.

We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records, provided that it is lawful for us to do so.

We take a range of measures to protect your personal information from:
- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

Storage and security of personal information
We take reasonable steps to protect the security of the personal Information we hold from both internal and external threats by:

- regularly assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure of that information
- we destroy personal information in a secure manner when we no longer need it.

However, data protection measures are never completely secure and, despite the measures we have put in place, we cannot guarantee the security of the Personal Information. You must take care to protect the Personal Information (for example, by protecting any usernames and passwords). You should notify us as soon as possible if you become aware of any security breaches.

5. Disclosure

We may disclose your personal information for any of the purposes for which it is held or for a lawful related purpose.

We may disclose your personal information where we are under a legal duty to do so.
Disclosure will usually be:

- internally and to our related entities
- to our Clients
- to Referees for suitability and screening purposes.

Related Purpose Disclosures
We outsource a number of services to contracted service providers (CSPs) from time to time. Our CSPs may see some of your personal information. Typically our CSPs would include:

- Software solutions providers;
- I.T. contractors and database designers and Internet service suppliers;
- Legal and other professional advisors;
- Background checking and screening agents;
- our Related Entities and Related Bodies Corporate (as those terms are defined in the *Corporations Act 2001* (Cth); and
- Government agencies and departments when we are contractually or legally required to do so.

We take reasonable steps to ensure that terms of service with our CSPs recognise that we are bound by obligations to protect the privacy of your personal information and that they will not do anything that would cause us to breach those obligations.

Disclosure of personal information overseas
We do not generally send personal information out of Australia. If you need us to send information to another country we will do so with your consent. If we are otherwise required to send information overseas you acknowledge that, by agreeing to the disclosure of your Personal Information to these entities outside of Australia, we will no longer be required to take reasonable steps to ensure the overseas recipient's compliance with the Australian privacy law in relation to your personal information and we will not be liable to you for any breach of the Australian privacy law by these overseas recipients. On this basis, you consent to such disclosure.

Generally we only disclose personal information for the purposes for which you gave it to us or for directly related purposes you would reasonably expect or if you agree. Web traffic information is disclosed to Google Analytics when you visit our websites.

Google stores information across multiple countries. For further information see Google Data Centres and Google Locations.

When you communicate with us through social network services, the social network provider and its partners may collect and hold your personal information overseas. These sites have their own privacy policies.

6. Access & Correction

Subject to some exceptions set out in privacy law, you can gain access to your personal information that we hold.

Important exceptions include:

- evaluative opinion material obtained confidentially in the course of our performing reference checks; and access that would impact on the privacy rights of other people. In many cases evaluative material contained in references that we obtain will be collected under obligations of confidentiality that the person who gave us that information is entitled to expect will be observed. We do refuse access if it would breach confidentiality.

Access Policy

If you wish to obtain access to your personal information you should contact our Privacy Officer. You will need to be in a position to verify your identity. We may impose a moderate charge in providing access.

Correction Policy

If you find that personal information that we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to correct it by contacting us.

We will take such steps as are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

Skillset may contact you from time to time to validate the information that we hold about you.

If we have disclosed personal information about you that is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to notify the third parties to whom we made the disclosure and we will take such steps (if any) as are reasonable in the circumstances to give that notification unless it is impracticable or unlawful to do so.

7. Enquiries & Complaints

You can make enquiries, requests to access/delete or correct your information, or complain about alleged breaches of the APP's or IPP's to our Privacy Officer:

Privacy Officer +61 2 6330 1400 privacy@skillset.com.au PO Box 646 BATHURST NSW 2795

Complaints

We have a Complaints Policy for dealing with your privacy complaints. Our Complaints Policy can be accessed on our website www.skillset.com.au or by contacting our Privacy Officer.

We aim to acknowledge receipt of all complaints within 10 working days, and aim to resolve all complaints within 30 working days. This may not be possible in all circumstances depending on the contents of the complaint. In this situation, we will respond to your complaint in a reasonable time. If you are not satisfied with our response to your complaint, you can contact the Office of the Australian Information Commissioner (OAIC).