

# 1 Scope

The policy applies to all workers (employees and contractors) of the organisation GWG Partners.

# 2 Objective

This statement outlines our policy on how we manage the personal information we hold about our customers and others. It applies to all operations within GWG Partners Pty Limited including visitors to our website.

The Privacy Policy demonstrates a commitment to maintaining information privacy in accordance with the by the National Privacy Principles (NPP) contained in the Privacy Act 1988 (as amended).

# 3 Requirements

The policy requires:

- 3.1.1 The internal capability to effectively manage and secure information
- 3.1.2 Systems and processes are in place to ensure information is managed within the policy parameters
- 3.1.3 Access to information is authorised and requestors are properly identified

# 4 Policy

## 4.1 Commitment

GWG Partners are committed to being transparent about how we use personal information. We will use our best efforts to ensure that the information you submit to us remains private, and is used only for the purpose you agree to. This document reflects our commitment to you.

It is the policy of GWG Partners to respect the confidentiality of information and the privacy of individuals. GWG Partners are bound by the National Privacy Principles (NPP) contained in the Privacy Act 1988 (as amended) in Australia.

Where our documents ask for personal information, we will generally state the purpose for its use and to whom it may be disclosed.

Personal information that we collect and hold usually falls into the following categories:

- Personal information submitted and obtained from each person seeking employment and other sources in connection with applications for work
- Work performance information
- Information about incidents in the workplace
- Staff information

- Information submitted and obtained in relation to absences from work due to leave, illness or other causes
- Information obtained to assist in managing client and business relationships

## **4.2 Reasons for Collecting Information**

We primarily collect personal information for the following:

- To assist you in finding a suitable position
- For career guidance and management
- To enable consultants to better service your career requirements
- To identify any training requirements
- To ensure we are familiar with and fully understand your needs
- To inform you of events, services and possible job opportunities
- For research, development and other business purposes to assist us in providing our services to you

## **4.3 Sensitive Information**

Sensitive information is a special category of personal information under the Australian Privacy Act 1988. It is information or opinion about you, including membership of a professional or trade association or membership of a trade union; criminal record; health or disability, etc. As outlined in the Australian Privacy Act, sensitive information can, in most cases, only be disclosed with your consent.

We may disclose your personal information (including to trusted third parties) for the purposes for which it is primarily held or for a related secondary purpose and in some cases we may only disclose information with your consent.

We do not disclose information about your individual visits to our websites. By submitting your application to us, you are agreeing to your personal details being forwarded to our offices and where you have applied for a specific role, to employers.

## **4.4 Management of Personal Information**

We train our staff to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and any breach will result in disciplinary action being taken, dependent upon severity.

We review our policies regularly to ensure that our management of personal information is in accordance with this statement and the relevant Privacy Acts.

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 paper-based files and other records, and take steps to protect the personal information we hold from misuse, 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.

Hays endeavours to ensure that the personal information it holds is accurate and up to date. We realise that information changes frequently with changes of address and other personal circumstances. In some cases we rely on you to advise us when your personal details change.

#### **4.5 Website Information**

In general, we gather information about website users, such as what areas users visit more frequently and what services users access the most. We only use such data anonymously and in the aggregate. This information helps us determine what is most beneficial for our users, and how we can continually create a better overall website experience for you.

In some instances we may need specific information about you, such as name, address, email address, telephone number, etc. We will collect this information if you apply for a job or sign up for a service via our website, for example. We may also ask you for other information such as the types of jobs you are interested in and your workplace concerns in order to provide you with the best possible service and internet experience.

We have several areas on our websites where you can submit feedback. Any feedback that is submitted through this area becomes the property of GWG Partners. We may use this feedback, such as success stories or responses to surveys, for marketing purposes, or to contact you for further feedback on the site

#### **4.6 Access to Information**

Subject to some exceptions that are set out in the Australian National Privacy Principles you can gain access to the personal information that we hold about you.

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

To make a request to access your personal information, you will need to complete an application form verifying your identity and specifying what information you require. Please contact our Privacy Officer for an application form.

We may impose a moderate charge in providing access. Our Privacy Officer will discuss this with you.

You should also anticipate that it may take time to process your application for access as there may be a need to retrieve information from storage and review it in order to determine what information is relevant.

#### **4.7 Policy Review**

The GWG Partners privacy policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current version of the GWG Partners privacy policy.

#### **4.8 Enquiries & Complaints**

You can make further enquiries or complaints about our privacy policy to:

Director, Corporate Services  
GWG Partners  
Level 6, 456-460 Hunter Street  
Newcastle NSW 2300

P 0249 050 130  
E [info@gwgpartners.com.au](mailto:info@gwgpartners.com.au)

If you are not satisfied with our response to your complaint you can contact the Australian Information Commissioner (OAIC).