

Recruitment Holdings Pty Limited

Candidate Privacy Notice

Last Updated: 01.10.2024

Introduction

Recruitment Holdings Pty Limited, a subsidiary of Recruitment Holdings Limited (“RHL”, “us”, “we”, “our”) are committed to protecting your privacy and meeting our legal obligations when you apply for a job or you (or an agent acting on your behalf) share your employment details with us.

We are a company registered in Queensland, Australia under registration number 623 035 147 and we have our registered office at Building 2, Level 3, 50 McDougall Street, Milton, QLD 4064.

This privacy notice (“this Notice”) explains what personal data we collect and use relating to registrations, applications, and associated candidates (“you”, “your”) during the recruitment process.

As one of the HR GO plc group companies, we place great importance on ensuring the quality, confidentiality, integrity, and availability of the data we hold, and in meeting our data protection obligations where we process personal data. We are committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.

We update this Notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to products and services we offer. When changes are made, we will update the ‘Last Updated’ date at the top of this document.

What personal data do we process?

Personal data means any information about an individual from which that person can be identified, therefore does not include data where the identity of the person has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection.

When you apply for a position, register with us, or submit your CV (or similar employment information), whether directly or through an agency, or attend a meeting in person or by remote means, we will collect your personal data. This may include (but is not limited to):

- Name and contact details (address, mobile phone number and email address);
- Company details (where applicable);
- Date of birth and gender;
- Work history and employment positions held;
- Salary, other compensation, and benefits information;
- Nationality / visa / work permit information (where applicable);
- Academic and professional qualifications, education, and skills;
- Photographs you may submit with your application;

- Demographic information;
- Records we create during meetings, online assessments or correspondence with you;
- If you log in to our website either directly, or by using LinkedIn or any other social media account: your profile data
- Results of pre-employment screening checks such as references or DBS checks (where applicable); and
- Any other information you choose to give us.

We may also collect special category data in accordance with the Equal Opportunity Act 2010. We will only do this, for example, to make reasonable adjustments to enable all candidates to apply for vacancies, attend interviews and to commence employment. This is also necessary to ensure we meet our legal obligations when recruiting.

Purposes and bases for using your personal data

We will process your personal information for the following purposes and under the following lawful bases (where applicable):

Purpose	Lawful Basis for Processing
<p>To provide you with our services.</p> <p>This includes (but is not limited to): finding you suitable job roles to apply for, sending your CV to prospective employers for their consideration, facilitating the process of applying for suitable job roles, keeping you informed of future work opportunities by email, telephone, post and/or other communication methods.</p>	<p>We have a legitimate interest to contact you regarding your application and to provide you with the services you would expect from us.</p>
<p>When you are working with or about to engage in an employment contract.</p>	<p>The processing would be necessary for the performance of a contract</p>
<p>Responding to correspondence from you.</p>	<p>It is in our legitimate interest to respond to enquiries made via our website contact forms, by email, through our social channels or any other means.</p>
<p>To manage our candidate database.</p>	<p>It is in our legitimate interest to manage our candidate database.</p>
<p>To make reasonable adjustments for you during the interview process and comply with our legal obligations under the Equal Opportunity Act 2010.</p>	<p>Processing is necessary for us to comply with our legal obligations.</p> <p>For special category data, the additional basis that we rely on relates to our obligations in the field of employment and the safeguarding of your fundamental rights.</p>

To conduct pre-employment screening checks including checking your identity and your right to work in Australia (where applicable).	Processing is necessary for us to comply with our legal obligations. For special category data, the additional basis that we rely on relates to our obligations in the field of employment and the safeguarding of your fundamental rights.
Sending you informational updates or marketing materials which may be of interest.	If we have captured your consent for the purposes of marketing, that consent may be withdrawn at any time by emailing dataprotection.jv@hrgo.co.uk or using the unsubscribe option.
To maintain a record of contact for current candidate engagement.	It is our legitimate interest to maintain a record of the contact we have with you within our candidate database.
Business management, forecasting and statistical purposes.	It is our legitimate interest to identify areas for managing current business relationships, develop new products and services, and for managing our business.
Improving our platforms, systems, and the overall end user experience.	It is our legitimate interest to allow analytics and search engine providers to help improve and optimise our platforms and systems.
To perform statistical and analytical research, comparing how effective our placement of candidates has been, between different business sectors for example.	It is our legitimate interest to perform statistical and analytical research, to identify factors that can influence any improve our service moving forward.
To comply with legal obligations and/or cooperate with investigations carried out by the police, government, or regulators.	The processing is necessary to comply with legal or regulatory obligations.

Sensitive personal data

We will only process sensitive 'special category' personal data where we meet one of the conditions required by law for doing so. This includes complying with legal obligations or exercising specific rights in the field of employment law. We may also ask for your explicit consent to process some special categories of personal data.

We process special categories of personal data when we collect or process information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work and to identify any workplace adjustments that may be required.

Sharing of your information

We may share your data with service providers and suppliers to our business who process data on our behalf. In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the written contract between RHL and the service providers and suppliers.

Should we wish to use your personal data for a purpose other than the one for which it was originally collected, and we think that you may not reasonably expect us to use or disclose it in this way, we will ensure that we request your consent prior to the additional use or personal data sharing taking place.

Where we need to transfer your personal data outside of Australia, we will ensure that the information is managed in accordance with the Australian Privacy Act 1988. We also retain accountability for your data in the event of any lapse of the Australian Privacy Principles by an entity outside of Australia.

We will explicitly seek consent for any transfer of your personal data to a country that is deemed not to provide an 'essentially equivalent' level of data protection to that which exists in Australia. If you consent to the disclosure, and the overseas recipient handles the personal information in breach of the Australian Privacy Principles:

- the overseas entity will not be accountable under the Privacy Act; and
- you will not be able to seek redress under the Privacy Act.

Where we process the personal data of individuals in the UK, we have taken appropriate steps to ensure that the Personal Data processed has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation) or
- We enter into an International Data Transfer Agreement ("IDTA") with the receiving organization and adopt supplementary measures, where necessary. (A copy of the IDTA can be found at [international-data-transfer-agreement.pdf](https://ico.org.uk/international-data-transfer-agreement.pdf) (ico.org.uk))

As RHL are part of the HR GO plc group, we may share your personal data with other group companies.

However, your personal data will only be shared with those who need to have access to it, which will primarily be our HR personnel, finance department, hiring managers and IT staff.

Where we are under a legal or regulatory duty to do so, we may disclose your details to the police, regulatory bodies or legal advisors, and/or, where we consider necessary to protect the rights, property or safety of RHL, its personnel, users or others. We may also disclose your personal information where a permitted general or health situation exists.

How long will we retain your information?

We aim to not hold candidate personal data for longer than is necessary. Records of your applications are retained for a period of 1 year from the date RHL last provided services to you. If you are successful in finding work through us, RHL will need to keep your personal information for a longer period in order to comply with its on-going legal and contractual obligations. For candidates working through RHL, we will usually retain any personal data concerning taxes, contracts of employment and any financial information (including payroll data and data relating to pay, etc.) for 7 years after your employment ends.

For candidates with whom we have an ongoing relationship, we will retain your personal data for as long as is necessary to provide you with our services.

Your rights

Individuals in either Australia or the UK, whose personal data we process have the following rights:

- You have the right of access to your personal data and can request copies of it and information about our processing of it
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it
- Where we are using your personal data with your consent, you can withdraw your consent at any time

In addition to the above, individuals in the UK also have the following rights:

- In some circumstances, you can restrict our processing of your data, request a machine-readable copy of your personal data to transfer to another service provider and compel us to erase your personal data
- Automated decision-making. You have the right not to be subject to a decision based solely on automated processing which will significantly affect you.
- Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way

We sometimes use automated screening tools as part of our application process. The answers you provide to one or more of the questions (excluding any special categories/equal opportunity questions) may result in your application being automatically declined. This technology is used to help us manage the high volume of applications we receive.

If you wish to exercise any of your rights, please write to the Data Protection Officer (“DPO”) at dataprotection.jv@hrgo.co.uk.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In addition to the above, please note that you have the right to make a complaint at any time to the relevant Supervisory Authority if you are concerned about the way in which we are handling your personal data.

The supervisory authority in Australia is the Office of the Australian Information Commissioner, who can be contacted by telephone on 1300 363 992 or via enquiries@oaic.gov.au.

The supervisory authority in the UK is the Information Commissioner’s Office who can be contacted online at <https://ico.org.uk/make-a-complaint/> or by telephone on +44 (0) 303 123 1113.

Contact

If you would like to discuss your statutory data protection rights, or if you have any concerns or questions about how we handle personal data, please contact us using the details below:

RHL Recruitment Pty Limited
c/o HR GO plc
The Cedars
Church Road
Ashford
Kent
TN23 1RQ
United Kingdom

Our telephone number is +61 (0)4 5656 5555. Alternatively, you can email us at dataprotection.jv@hrgo.co.uk.

Please send your communication clearly indicating 'F.A.O Data Protection Officer' and your message will be passed directly to the DPO for attention.