



**PRIVACY POLICY  
AND  
DISCLOSURE STATEMENT**

**1. Introduction**

- 1.1 From time to time Impel Management Pty Ltd (ABN 73 641 684 540) ("**the Company**") is required to collect, hold, use and/or disclose personal information relating to individuals (including, but not limited to, candidates, clients, suppliers, referees, contractors and employees) in the performance of its business activities.
- 1.2 This document sets out the Company's policy in relation to the protection of personal information, as under the *Privacy Act 1998* (Cth) (the **Act**) and the Australian Privacy Principles (**APP**).
- 1.3 The APPs regulate the handling of personal information.

**2. What is personal information?**

- 2.1 Personal information means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

**3. Employee records**

- 3.1 This policy does not apply to the collection, holding, use or disclosure of personal information that is an employee record.
- 3.2 An employee record is a record of personal information relating to the employment of an employee. Examples of personal information relating to the employment of the employee include, but are not limited to, health information and information about the engagement, training, disciplining, resignation, termination, terms and conditions of employment of the employee. Please see the Act for further examples of employee records.

**4. Kinds of information that the Company collects and holds**

- 4.1 The Company collects personal information that is reasonably necessary for one or more of its functions or activities.
- 4.2 The type of information that the Company collects and holds may depend on your relationship with the Company. For example:
  - a) **Candidate:** if you are a candidate seeking employment with the Company or the Company's clients, the Company may collect and hold information including your name, address, email address, contact telephone number, gender, age, employment history, references, resume, medical history, emergency contact, taxation details, qualifications and payment details.
  - b) **Client:** if you are a client of the Company, the Company may collect and hold information including your name, address, email address, contact telephone number, gender and age.
  - c) **Supplier:** if you are a supplier of the Company, the Company may collect and hold information including your name, address, email address, contact telephone number, business records, billing information, information about goods and services supplied by you.
  - d) **Referee:** if you are a referee of a candidate being considered for employment by the Company or one of the Company's clients, the Company may collect and hold information including your name, contact details, current employment information and professional opinion of candidate.

4.3 **Sensitive information:** The Company will only collect sensitive information where you consent to the collection of the information and the information is reasonably necessary for one or more of the Company's functions or activities. Sensitive information includes, but is not limited to, information or an opinion about racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, membership of a trade union, sexual preferences, criminal record, health information or genetic information.

## 5. How the Company collects and holds personal information

5.1 The Company must collect personal information only by lawful and fair means. The Company will collect personal information directly from you if it is reasonable or practicable to do so.

5.2 The Company may collect personal information in a number of ways, including without limitation:

- a) through application forms;
- b) by email or other written mechanisms;
- c) over a telephone call;
- d) in person;
- e) through transactions;
- f) through our website;
- g) through surveillance cameras;
- h) by technology that is used to support communications between us;
- i) from third parties, including but not limited to:
  - i) from past and present employers and referees when conducting reference checks, candidates after completing an interview, clients of the Company and contract management services in relation to assignments;
  - ii) through publicly available information sources (which may include telephone directories, the internet and social media sites); and
  - iii) direct marketing database providers.

5.3 When the Company collects personal information about you through third parties, it will manage such information in accordance with the APPs.

5.4 Much of the personal information that the Company holds is stored in our Information Record System. The Company's Information Record System comprises of hard copy files and/or electronic files in the Company's ordinary IT systems. These may include cloud servers or servers of third parties.

5.5 **Unsolicited personal information** is personal information that the Company receives which it did not solicit. Unless the Company determines that it could have collected the personal information in line with the APPs or the information is contained within a Commonwealth record, it must destroy the information to ensure it is de-identified.

## 6. Purposes for which the Company collects, holds, uses and/or discloses personal information

6.1 The Company will collect personal information if it is reasonably necessary for one or more of its functions or activities.

6.2 The main purposes for which the Company may collect, hold, use and/or disclose personal information may include but are not limited to:

- a) recruitment functions;
- b) customer service management;
- c) training and events;
- d) surveys and general research; and
- e) business relationship management.

6.3 The Company may also collect, hold, use and/or disclose personal information if you consent or if required or authorised under law. For example, the Company may be required or authorised to collect your Tax File Number, if you choose to provide it, by the *Income Tax Assessment Act 1936* (Cth).

6.4 If you do not allow the Company to collect all or some of the personal information we request, the Company may not be able to achieve its purposes. For example, if you are a Candidate the Company may not be able to locate suitable work for you, or if you are a Client the Company may not be able to provide you with the product or service you are seeking.

## 6.5 **Direct marketing**

- a) The Company may use or disclose personal information (other than sensitive information) about you for the purpose of direct marketing (for example, advising you of new goods and/or services being offered by the Company).
- b) The Company may use or disclose sensitive information about you for the purpose of direct marketing if you have consented to the use or disclosure of the information for that purpose.
- c) You can opt out of receiving direct marketing communications from the Company by contacting the Privacy Officer in writing or if permissible accessing the Company's website and unsubscribing appropriately.

## 7. **Disclosure of Personal Information**

7.1 The Company may disclose your personal information for any of the purposes for which it is was collected, as indicated under clause 6 of this policy, or where it is under a legal duty to do so.

7.2 Disclosure will usually be internally, to related entities, candidates, referees, potential and actual employers and clients of the Company.

7.3 The Company may disclose personal information to third parties such as contracted service suppliers (**CSP**). Examples of CSPs include, but are not limited to, financial institutions for payment processing, information technology service providers, marketing and communications agencies, printers and distributors of direct marketing material and external business advisors.

7.4 Before the Company discloses personal information about you to a third party, the Company will take steps as are reasonable in the circumstances to ensure that the third party does not breach the APPs in relation to the information.

### 7.5 **Cross-border disclosure of personal information**

- a) The Company is likely to disclose personal information to overseas recipients.
- b) Before the Company discloses personal information about you to an overseas recipient, the Company will take steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the APPs in relation to the information.
- c) The countries in which overseas recipients are likely to be located include:
  - i. Hong Kong
  - ii. Singapore

## 8. **Access to personal information**

8.1 If the Company holds personal information about you, you may request access to that information by putting the request in writing and sending it to the Privacy Officer. The Company will respond to any request within a reasonable period, and a charge may apply for giving access to the personal information.

8.2 There are certain circumstances in which the Company may refuse to grant you access to the personal information. In such situations the Company will give you written notice that sets out:

- a) the reasons for the refusal; and
- b) the mechanisms available to you to make a complaint.

## **9. Correction of personal information**

- 9.1 If the Company holds personal information that is inaccurate, out-of-date, incomplete, irrelevant or misleading, it must take steps as are reasonable to correct the information.
- 9.2 If the Company holds personal information and you make a request in writing addressed to the Privacy Officer to correct the information, the Company must take steps as are reasonable to correct the information and the Company will respond to any request within a reasonable period.
- 9.3 There are certain circumstances in which the Company may refuse to correct the personal information. In such situations the Company will give you written notice that sets out:
- a) the reasons for the refusal; and
  - b) the mechanisms available to you to make a complaint.
- 9.4 If the Company corrects personal information that it has previously supplied to a third party and you request us to notify the third party of the correction, the Company will take such steps as are reasonable to give that notification unless impracticable or unlawful to do so.

## **10. Integrity and security of personal information**

- 10.1 The Company will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that it:
- a) collects is accurate, up-to-date and complete; and
  - b) uses or discloses is, having regard to the purpose of the use or disclose, accurate, up-to-date and complete.
- 10.2 The Company will take steps as are reasonable in the circumstances to protect the personal information from misuse, interference, loss and from unauthorised access, modification or disclosure.
- 10.3 If the Company holds personal information, it no longer needs the information for any purpose for which the information may be used or disclosed, the information is not contained in any Commonwealth record and the Company is not required by law to retain the information, it will take such steps as are reasonable in the circumstances to destroy the information or to ensure it is de-identified.

## **11. Anonymity and Pseudonymity**

- 11.1 You have the option of not identifying yourself, or using a pseudonym, when dealing with the Company in relation to a particular matter. This does not apply:
- a) where the Company is required or authorised by or under an Australian law, or a court/tribunal order, to deal with individuals who have identified themselves; or
  - b) where it is impracticable for the Company to deal with individuals who have not identified themselves or who have used a pseudonym.
- 11.2 However, in some cases if you do not provide the Company with your personal information when requested, the Company may not be able to respond to your request or provide you with the goods or services that you are requesting.

## **12. Complaints**

- 12.1 You have a right to complain about the Company's handling of your personal information if you believe the Company has breached the APPs.
- 12.2 If you wish to make such a complaint to the Company, you should first contact the Privacy Officer in writing. Your complaint will be dealt with in accordance with the Company's complaints procedure and the Company will provide a response within a reasonable period.
- 12.3 If you are unhappy with the Company's response to your complaint, you may refer your complaint to the Office of the Australian Information Commissioner.

**13. Company and Privacy Officer contact details**

13.1 The Company can be contacted in the following ways:

Telephone number: (02) 8056 8454  
Email address: info@impelmanagement.com.au  
Postal address: PO Box 1019, Double Bay, NSW, 1360

13.2 The Company's Privacy Officer can be contacted in the following ways:

Company Privacy Officer: Francesca Farnon  
Telephone number: (02) 8056 8454  
Email address: francesca@impelmanagement.com.au  
Postal address: PO Box 1019, Double Bay, NSW 1360

I ..... (FULL NAME)  
of ..... (ADDRESS)

who can be identified by (e.g. drivers licence number) .....

have read and understood each of the statements in this Privacy Policy and Collection Statement and Consent to Electronic Transactions, and have had sufficient opportunity to read and understand these documents. I voluntarily consent to:

1. personal information about me being collected and held by you as indicated in Impel Management's Privacy Policy and Collection Statement;
2. personal information about me being used as indicated in Impel Management's Privacy Policy and Collection Statement;
3. personal information about me being disclosed as indicated in Impel Management's Privacy Policy and Collection Statement;
4. engaging in electronic transactions with regard any matter connected with the purposes for which my personal information may be used or disclosed as indicated above.

DATE: .....

SIGNED: .....

WITNESS: .....

PRINT WITNESS NAME AND ADDRESS: .....

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