

Data Collection Statement and Privacy Policy

1. Collection Statement

It is important that SustainHealth Recruitment collects personal and sensitive information about you for the primary purpose of providing a quality service to you in obtaining you employment.

If you do not provide this information; we may be unable to assist you in obtaining employment. This information will be used in making any reasonable inquiries to verify your credentials and good clinical standing in order to ensure that you are suitable for any position that you are offered. This includes making contact with referees that SustainHealth Recruitment deems appropriate and checks with any licensing bodies with whom you have been registered in the past or currently; this includes and is not limited to any criminal record checks, working with children checks, vulnerable peoples checks, serology reports, and/or medical health declarations to which you may be required to undertake, as part of the employment process and understand that this is for credentialing and duty of care purposes.

SustainHealth Recruitment may disclose this information (whether in whole or in part) to third parties including but not limited to potential employers, contractors and/or regulatory bodies in order to provide a quality of service to you in obtaining you employment. Although all information we ask from you is voluntary, if you choose not to provide the information we seek, we may be limited in our ability to assist you in seeking employment, however obtaining this employment is not guaranteed.

2. Privacy Policy

- 2.1. References to “we”, “our”, “us” and “SustainHealth” means SustainHealth Consulting PTY Limited ABN 77 620 072 915 and including its employees, contractors, agents and assigns.
- 2.2. SustainHealth is committed to respecting and protecting your privacy. We comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APP) as set out in the Privacy Act.
- 2.3. This Privacy Policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be managed by us.
- 2.4. Please read this Privacy Policy carefully. When you provide personal information to us you will be deemed to have read and understood this Privacy Policy.

3. SustainHealth

- 3.1. SustainHealth carries out business as a recruitment agency. Our role is to assist a business (“Client”) to place/employ a candidate (“Candidate”), being somebody who we have identified as potentially being suitable for the role (referred to collectively as our “Services”).
- 3.2. In the course of carrying out the Services we will obtain two (2) professional reference checks from persons who have managed or are in a supervisory position to that of the Candidate (“Referee”).

4. Collection of Information

- 4.1. We collect personal information as reasonably necessary to enable us to carry out the Services, and to enable us to comply with legal requirements.
- 4.2. We may also collect sensitive information for the purposes referred to in the section 4.3. Sensitive information will only be collected with your consent and where it is necessary as relating to a genuine

occupational requirement or an inherent requirement of the role/work being considered. All such sensitive information will be managed in accordance with the Privacy Act and this Privacy Policy.

- 4.3. We may collect personal and/or sensitive information (collectively referred to as “personal information”) from you for the following purposes:
 - 4.3.1. If you are a Client: for the purpose of providing the Services, including, but not limited to, client and business relationship management, work placement operations, recruitment functions, training needs assessments, risk management, work health and safety operations, statistical purposes and statutory compliance requirements, sponsorship applications, District of Workforce Shortage (DWS) and Distribution Priority Area (DPA) applications and Area of Need (AON) applications.
 - 4.3.2. If you are a Candidate: for the purpose of providing the Services, including, but not limited to, verifying your identity, work placement operations, recruitment functions, staff management, payment purposes, training needs assessments, risk management, work health and safety operations, and statistical purposes and statutory compliance requirements.
 - 4.3.3. If you are a Referee: for the purpose of providing the Services, including, but not limited to, confirming identity and authority to provide references, candidate suitability assessment, recruitment functions and risk management.
 - 4.3.4. If you are contractor or supplier: for the purpose of providing the Services, including, but not limited to, identity and credential documentations, insurance and compliance, and any other risk management documentations deemed necessary at the time by us.

5. Data Collection

- 5.1. We may collect personal information from you in the following different ways for our own use and/or on behalf of other members of SustainHealth who may require access to your personal or sensitive information in connection with our Service;
 - 5.1.1. If you are a Client: including, but not limited to, when you provide that information to us for business or business-related social purposes, or electronically through our telecommunications and technology systems.
 - 5.1.2. If you are a Candidate: including, but not limited to, when you fill out and submit one of our application, compliance, consent, and disclosure forms or provide any other information to us in connection with an application for work. Information may also be collected electronically through our telecommunications and technology systems; and in circumstances where we give or receive any reference about you, we receive results of inquiries that we make of former employers, colleagues, professional association or registration body, we receive results of any competency, psychometric or medical test, we receive performance feedback (positive or negative), we receive any complaint from or about you in the workplace, we receive any information about a workplace accident in which you are involved, or we receive information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved.
 - 5.1.3. If you are a Referee: including, but not limited to, when you provide that information to us in the course of our checking Candidate references with you and when we are checking information that

we obtain from you about Candidates, for business or business-related social purposes, or electronically through our telecommunications and technology systems.

6. The type of personal information which we collect may include;
 - 6.1. If you are a Client: information that is necessary to help us manage the presentation and delivery of our Services, including, but not limited to, client relationship information, information about position, contracting and hiring authority, information about team structures and roles, information about incidents in the workplace, company financials and credit history checks.
 - 6.2. If you are a Candidate: information that is necessary to confirm your identity, assess amenability to work offers, suitability for placements, to comply with legislation or to manage performance in work obtained through us, including, but not limited to, personal details such as name, address, date of birth, gender and contact information, information about personality, character, skills, qualifications and experience, information about career path and preferences, information about work entitlement and ability to undertake specific types of work, work performance information, information about incidents in the workplace, information submitted and obtained in relation to absences from work (for any reason), bank details for the purpose of making payment, criminal history records (Australian and International) and working with children checks, working with vulnerable people check, health records, and pay roll information such as Tax File Number or ABN.
 - 6.3. If you are a Referee: information that is necessary to help make determinations about the suitability of a Candidate for a particular role or type of role, including but not limited to information about work position, authority to give a reference and preferred contact details, opinions of the Referee regarding the Candidate's character and work performance/environment, and facts or evidence in support of those opinions.
 - 6.4. You acknowledge that the personal information which we collect is reasonably necessary for us to provide our Services in connection with the purposes referred to in paragraph 4.3 and that failure to provide complete and accurate information may prevent SustainHealth from providing our Services to you.
 - 6.5. You acknowledge that we may collect personal information about you from other organisations and publicly available sources including newspapers, journals, directories, the Internet and social media sites, for the purpose of providing our Services. All such personal information will be managed in accordance with the Privacy Act and this Privacy Policy.
 - 6.6. You acknowledge that if you provide personal information to us about a third party, you will have first taken reasonable steps to make that third party aware of the matters referred to in this Privacy Policy and you are warranting to us that you have their consent to the collection, use and disclosure of that personal information. All such personal information will be managed in accordance with the Privacy Act and this Privacy Policy.
7. Holding of Information
 - 7.1. We hold personal information on our database, network and in our Sydney-based office. Some information may also be held on portable devices such as mobile phones, laptop computers or in diaries operated by our staff members in order to perform the Services.

- 7.2. We will take all reasonable steps to protect your information, see our cyber protection policy for additional information. However, we cannot guarantee the security of your information transmitted to us electronically and any transmission is at your own risk.
 - 7.3. Upon receiving your information we will take all reasonable steps to ensure that it is secure from any unauthorised access, misuse or disclosure. However, we do not guarantee that your information cannot be accessed by an unauthorised person or that unauthorised disclosure will not occur.
 - 7.4. In line with the Privacy Act, 1988, our Licencing obligations, and other business requirements, SustainHealth will hold information provided for a period of 7 years.
8. Information disclosure
- 8.1. We use personal information held about you for the primary purpose of performing the Services.
 - 8.2. We may also use personal information for our assessment of a Candidate's suitability for registration. The necessary validation (including from appropriate third party sources) includes, but is not limited to, checks of a Candidate's resume, C.V., nominated references, or stated qualifications, experience, training or abilities, a Candidate's actual or possible work placement, a Candidate's work appraisals, any test or assessment (including medical) that a Candidate might be required to undergo, our assessment of a Candidate's ongoing performance and prospects, our identification of training needs, suggestions we may make for further training, any workplace rehabilitation, our management of any complaint, investigation or inquiry in which a Client or Candidate is involved, any insurance claim or proposal that requires disclosure of personal or sensitive information, any reference that we may give concerning a Candidate's work, and to meet our statutory compliance obligations.
 - 8.3. We may disclose personal information held about you;
 - 8.3.1. If you are a Client, to Candidates and Referees;
 - 8.3.2. If you are a Candidate, to Clients and Referees;
 - 8.3.3. If you are a Referee, to Clients and Candidates;
 - 8.3.4. To such other third parties as may be required in order to provide the Services;
 - 8.3.5. To a person seeking a reference;
 - 8.3.6. To our insurers;
 - 8.3.7. To a professional association or registration body that has a proper interest in the disclosure of the information;
 - 8.3.8. To a Workers Compensation body;
 - 8.3.9. To criminal record checking agencies;
 - 8.3.10. To our contractors and suppliers;
 - 8.3.11. To an attorney or next-of-kin whom we may contact in any case in which consent is required or notification is to be given and it is not practicable to obtain it from or give to directly to you;
 - 8.3.12. If we are under a duty to disclose your personal information in order to comply with any legal obligation, or to protect the rights, property or safety of SustainHealth, its Clients or others; or
 - 8.3.13. As otherwise permitted by law.

8.4. We may also use and disclose personal information held about you for secondary purposes which are related to the primary purpose of providing services to you. You acknowledge and agree that those secondary purposes may include the below, which you may at any time decline to receive by contacting us as referred to in section 15.1:

8.4.1. Adding your details to our mail-out list to inform you of services which may affect or interest you; and

8.4.2. Notify you of any changes to our organisation or other news which may be relevant to your circumstances;

8.5. You acknowledge that we outsource a number of services to contracted service suppliers (“CSPS”) from time to time, including software solutions providers, IT contractors, database designers, Internet service suppliers, legal and professional advisors, background checking and screening agents, marketing suppliers and data cleansing partners. We take reasonable steps to ensure that the terms of service with our CSPs recognise that we are bound by privacy obligations and that they will not do anything that would lead to a breach of those obligations.

9. Direct Marketing

9.1. You acknowledge that we may use your personal information to provide you with current information about our services, special offers you may find of interest, or new products or services being offered by us or one of our associated companies.

9.2. By providing us with your personal information you consent to us using such information to make contact with you on an ongoing basis for this purpose, including by telephone, mail, email, SMS and social media.

9.3. You may at any time decline to receive such information by contacting us as referred to section 15.1.

10. Cross-Border Disclosure

10.1. Some of your personal information is likely to be disclosed to overseas recipients. The likely countries, type of information disclosed and likely recipients are indicated, so far as is practicable, in the table below;

Country	Type of information	Likely Recipients
Multiple locations	Any personal or sensitive information held on our database	Our vendors and contractors. Contact us for our vendor’s privacy policies and General data protection regulation.
The Philippines	Personal and/or sensitive information, including but not limited to resumes, qualifications, results of background checks, as per this privacy policy.	Contractors for the purpose of providing recruitment support as necessary for our functions and activities as a recruitment agency. All staff are bound by a confidentiality agreement regarding company and customer information.
India	Personal and/or sensitive information, including but not limited to resumes, qualifications, results of background checks, as per this privacy policy.	Contractors for the purpose of providing recruitment support as necessary for our functions and activities as a recruitment agency. All staff are bound by a confidentiality agreement regarding company and customer information.

- 10.2. We take reasonable steps to ensure that the terms of service with our overseas recipients recognise that we are bound by privacy obligations and that they will not do anything that would lead to a breach of those obligations.

11. Electronic Transactions

- 11.1. You acknowledge that we collect personal information from our website <https://www.sustainhr.com.au/> and via other technology in the course of electronic transactions such as SEEK, Indeed, or LinkedIn.
- 11.2. Further details about the manner in which such electronic transactions may take place can be found in our “Electronic Transactions Statement”. All personal information collected during the course of electronic transactions will be managed in accordance with the Privacy Act and this Privacy Policy.
- 11.3. It is important to understand the risks associated with the use of the internet. SustainHealth takes all appropriate steps to protect your personal information.
- 11.4. Emails and attachments sent are confidential and are for the intended addressee[s] only. Unauthorised use of this communication is prohibited. If you have received communication in error, please notify the sender and remove them from your system. Confidentiality is not waived or lost by reason of the mistaken delivery. Before opening or using any attachments, it is your responsibility to check them for viruses and defects.

12. Access to Personal Information

- 12.1. You may, at any time, request access to the personal information which we hold about you by sending an email to info@sustainhr.com.au. We will respond to such request within a reasonable time of it being received by us.
- 12.2. We will endeavour to provide access in the manner requested by you if it is reasonable and practicable to do so, otherwise we will take such steps as are reasonable to provide access in a way that meets both your and our needs.
- 12.3. In assessing whether the request is reasonable and practicable, we may consider privacy of other entities before disclosing, trade secrets and business goodwill, among other considerations.
- 12.4. We may charge you for providing access to your personal information. You will be advised of the relevant charge and asked to make payment prior to access being provided.
- 12.5. If we refuse your request for access on any ground permitted by law, we will give you written notice in accordance with the Privacy Act including setting out the ground/s of the refusal (except to the extent that it would be unreasonable to do so) and the mechanisms to complain about the refusal.

13. Correction of Personal Information

- 13.1. You may, at any time, request us to correct the personal information which we hold about you by sending an email to info@sustainhr.com.au. We will respond to such request within a reasonable time of it being received by us.
- 13.2. Where personal information which has previously been disclosed to another organisation in accordance with the Privacy Act and this Privacy Policy has been corrected you may, at any time, request us to notify the other organisation of the correction. We will take such steps as are reasonable to give that notification unless it is impracticable or unlawful to do so.

13.3. If we refuse your request to correct your personal information, we will give you written notice in accordance with the Privacy Act including setting out the grounds for the refusal (except to the extent that it would be unreasonable to do so) and the mechanisms to complain about the refusal.

13.4. If we refuse your request to correct your personal information, you may request that we associate with your personal information a statement that in your view the information is inaccurate, out of date, incomplete, irrelevant or misleading. We will take such steps as are reasonable to associate the statement with your personal information in such a way that the statement will be apparent to users of the information.

14. Changes to Privacy Policy

14.1. This Privacy Policy may be changed from time to time. All changes will be notified by posting a copy of the updated Privacy Policy on our website.

14.2. If you continue to use our website and/or Services after posting of such updated Privacy Policy, you will be deemed to have read and understood the terms of the updated Privacy Policy.

15. Questions and Complaints

15.1. If you require any further information, have any questions or wish to make a complaint you should contact SustainHealth:

By mail: Level 3, 20 Bond Street, Sydney NSW 2000

By email: info@sustainhr.com.au

By phone: 02 8274 4677

15.2. We will respond to requests for information and/or questions within a reasonable time of such request or question being received by us.

15.3. We will take such steps as are reasonable to investigate complaints, within a reasonable time of such complaint being received by us. We will give you written notice of the investigations which have been carried out and the outcome of your complaint.