

Maverick Rose - Privacy Policy

The last update to this document was **23 October, 2018**

Introduction

This is the privacy policy of Maverick Rose Pty Ltd ACN 154 344 242 and its affiliated entities (**Maverick Rose, we, us, our**). This privacy policy applies to all Maverick Rose brands, including Sagacity Consulting, Sagacity Search, Ready Talent, Eskimo Resource Solutions and Career Ahead.

Maverick Rose is committed to complying with applicable privacy laws in relation to the personal information that we collect in the course of running our business. Where applicable privacy laws provide for exceptions or exemptions, we may rely on those exceptions or exemptions in our information handling practices.

Please take a moment to read our Privacy Policy as it explains how we manage personal information including our obligations and your rights in respect of our dealings with your personal information.

Key definitions

In this document:

- "**APPs**" means the Australia Privacy Principles set out in the Privacy Act;
- "**personal information**" has the meaning set out in the Privacy Act, and (in summary) means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or otherwise;
- "**Privacy Act**" means the *Privacy Act 1988* (Cth); and
- "**sensitive information**" has the meaning set out in the Privacy Act, and includes certain specific types of personal information such as health information, and information about a person's racial or ethnic origin, sexual orientation, religious beliefs or affiliations and criminal record.

1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you.

We may collect the personal information you directly give us through some of the following means:

- (a) when you make an inquiry or order in relation to goods or services, including through our websites, including those located at www.maverickrose.com.au and www.careerahead.com.au (the **Websites**);
- (b) when you participate in our activities and programs (for example, when you take our online tests and surveys, use our career coaching services, or apply for a work placement or employment opportunity that we are managing on behalf of our client);
- (c) in administering and performing any contracts with service providers;
- (d) when you contact us via telephone or other means;
- (e) from correspondence (whether in writing or electronically);

- (f) through any mobile applications provided by our organisation;
- (g) while conducting customer satisfaction and market research surveys;
- (h) when administering any of our services; and
- (i) as otherwise required to manage our business.

In certain cases we may collect personal information from publicly available sources and third parties, such as suppliers, recruitment agencies, contractors and business partners.

Where we are engaged by your company, school, university or other organisation to provide you with services (such as career coaching, employability training and work placement services), we may also collect information about you from your organisation in order to provide you with the services.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

2. Types of personal information we collect

The types of personal information we may collect can include (but are not limited to) your name, postal address, email address, phone numbers, date of birth, payment information, drivers licence, billing information and, if applicable, current and former employment details.

Our services include career coaching, employability training, work placement and recruitment services. As part of these services, we may collect various types of personal information about candidates, which may include:

- information about the candidate's education, employment history, qualifications and skills;
- information about the candidate's career goals (and areas for development);
- the results of any relevant tests or evaluations the candidate has completed;
- feedback on the candidate provided by their referees; and
- other information that may be relevant to a position that the candidate is being considered for (such as information about the candidate's right to work status).

We only collect sensitive information about you with your consent, or otherwise where permitted by the Privacy Act.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services.

3. Our purposes for handling your personal information

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use and disclose personal information to:

- (a) confirm your identity;
- (b) offer and provide you with our goods and services;
- (c) to offer you career development and/or employment opportunities;
- (d) manage and administer those goods and services, including account keeping procedures;
- (e) optimise and customise the user experience (including content and advertising) for users of our Websites and our other websites, mobile applications and services;

- (f) protect the security and integrity of the Website and our other websites, mobile applications and services;
- (g) develop and improve our products and services;
- (h) communicate with you, including (but not limited to) emailing you tax invoices;
- (i) comply with our legal and regulatory obligations; and
- (j) otherwise to manage our business.

We may also use or disclose your personal information:

- (k) for the purposes for which we collected it (and related purposes which would be reasonably expected by you);
- (l) for other purposes to which you have consented; and
- (m) as otherwise authorised or required by law.

4. Who we disclose your personal information to

The types of persons, agencies and entities we typically disclose personal information to include (but are not limited to):

- (a) our suppliers, contractors, organisations that provide us with technical and support services;
- (b) the trusted partner organisations with whom we work to provide our career development, work placement and employability programs and activities, including:
 - (i) schools, universities and other educational institutions;
 - (ii) industry partners, including companies and professional services firms;
 - (iii) government departments and other public sector bodies; and
 - (iv) research partners;
- (c) our accountants, insurers, lawyers, auditors and other professional advisers;
- (d) our related entities (who may use and disclose the information in the same manner we can);
- (e) companies who may use your personal information in order to tailor electronic advertising to you (eg on a webpage) in relation to our goods and services;
- (f) HR-related service providers (eg for background checks, screening or aptitude testing), if you apply for a job or other engagement with us or one of our clients;
- (g) any third parties to whom you have directed or permitted us to disclose your personal information (e.g. referees); and
- (h) in the unlikely event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors.

Where we are engaged by your company, school, university or other organisation to provide you with services, we may also share information about your participation in those services with your organisation.

We may also disclose your personal information in accordance with any consent you give or where disclosure is authorised, compelled or permitted by law.

If we disclose information to a third party to store or handle on our behalf, we generally require that the third party protect your information to the same extent that we do.

If you post information to certain public parts of our Websites or to our social media pages, you acknowledge that such information may be available to be viewed by the public. You should use discretion in deciding what information you upload to such sites.

We may also share anonymised “hashed” data with social media advertising partners, such as Facebook, so that they can deliver advertisements on our behalf to their members.

5. Protection of personal information

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas.

We use a range of security measures to protect the personal information we hold, including by implementing IT security tools to protect our electronic databases and ensuring that employees and third parties with access to records containing personal information are subject to appropriate information security obligations.

However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information. Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the Competition and Consumer Act 2010 (Cth). Please notify us immediately if you become aware of any breach of security.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

6. Direct marketing

Like most businesses, marketing is important to our continued success. We therefore like to stay in touch with customers and let them know about new offers and opportunities. We may provide you with information about products, services and promotions either from us, or from third parties which may be of interest to you.

You may opt out at any time if you no longer wish to receive direct marketing messages from us. You can make this request by contacting our Privacy Officer.

7. Cookies

A cookie is a small text file stored in your computer’s memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser’s manual.

We may use third party vendors to show our ads on sites on the Internet and serve these ads based on a user’s prior visits to our Website. We may also use analytics data supplied by these vendors to inform and optimise our ad campaigns based on your prior visits to our Website.

8. Accessing and correcting your personal information

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

9. Overseas transfers of personal information

We may disclose your personal information to our related entities, trusted partner organisations, service providers and agents located overseas, including in the United Kingdom.

From time to time we may also engage an overseas recipient to provide services to us, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider.

By providing your personal information to us, you consent to us disclosing your personal information to any such overseas recipients for purposes necessary or useful in the course of operating our business, and agree that APP 8.1 will not apply to such disclosures.

For the avoidance of doubt, in the event that an overseas recipient breaches the Australian Privacy Principles, that entity will not be bound by, and you will not be able to seek redress under, the Privacy Act.

10. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Privacy Officer:

The Privacy Officer

PO Box 1306, South Melbourne, Victoria, 3205

Telephone **+61 (0)3 9696 8880**

Email **samuel.sturgess@maverickrose.com.au**

We take all complaints seriously, and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner

GPO Box 5218, Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

11. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.