

Pipeline Talent's commitment to maintaining your privacy

Our Commitment to Privacy

Pipeline Talent Pty Ltd ABN 62 612 651 644, its subsidiaries and affiliates in Australia (collectively referred to as **Pipeline Talent**) is committed to managing personal information in accordance with the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (the **Privacy Act**).

About Pipeline Talent

Pipeline Talent is a recruitment service provider, offering a range of services including:

- Executive recruitment services;

About this Privacy Policy

This document sets out our policies for managing your personal information, including directly from you or via .

By providing information to us and using our websites and/or mobile applications, you are agreeing to be bound by this Privacy Policy.

Terminologies

In this Privacy Policy, the following terms have the following meanings:

- any reference to "**Pipeline Talent**", "**we**", "**us**" or "**our**" refer to Pipeline Talent Pty Ltd ABN 62 612 651 644 and each of Pipeline Talent's related bodies corporate (as that term is defined in the Corporations Act 2001 (Cth));
- "**Advertiser**" means a User that posts job ads on the Site or uses other Pipeline Talent products to source potential Candidates for job vacancies;
- "**Candidate**" means a User who is a job seeker;
- "**Personal Information**" is information or an opinion about an identified individual, or an individual who is reasonably identifiable. For example, this may include your name, age, date of birth, gender, contact details and postcode. It may also include financial information, including your credit card information, or a photograph of you. Personal information does not include anonymous, aggregated or de-identified information or information about companies which does not identify individuals;
- "**Privacy Policy**" means this document;
- "**Registered User**" means Candidates who register and create a profile on the Site. A Registered User's profile can include a resume, employment and educational history, contact details, minimum salary expectations and preferred job classifications and locations (a **Profile**);
- "**Sensitive information**" is a category of personal information and may include information about racial or ethnic origin, political opinions, religious or philosophical beliefs, criminal record, membership of a professional, trade association or trade union or sexual preferences;
- "**Site**" means pipelinerecruitment.com.au which is owned and operated by Pipeline Talent;
- "**User**" or "**you**" means any individual who uses or visits the Site.

What personal information do we collect about you?

We collect personal information where it is necessary to deliver products or services, otherwise conduct the functions and activities of Pipeline Talent, as required by law and (as described below) for the purposes of better customising our services to you.

The type of personal information that we collect will vary depending on the circumstances of the collection (whether you are a User, Candidate, Registered User or an Advertiser) and the kind of Pipeline Talent service used, but will typically include:

- Name, e-mail, postal address and other contact details;
- Any additional personal information you provide to us, or authorise us to collect, as part of your use of the Site and/or interaction with Pipeline Talent.

For Registered Users, we typically also collect:

- Age or date of birth;
- Professional details, qualifications, skills, qualifications or work history;
- Educational history;
- Job preferences (such as minimum salary expectations, preferred job classifications and locations).

For Advertisers, we typically also collect:

- Information about the organisation who you represent (company name, business address, billing address);
- Details of a primary contact.

We may also collect sensitive information in the course of fulfilling our functions or providing our services. We will only collect sensitive information with the person's consent or as required by law.

You can always decline to give Pipeline Talent any personal information we request, but that may mean we cannot provide you with some or all of our services. If you have any concerns about personal information we have requested, please let us know.

Collecting other information about Site Users

Pipeline Talent collects non-Personal Information on Site visits by Users including, without limitation, which sections of the Site are most frequently visited, how often, and for how long. This data is always used as aggregated, non-Personal Information, and may be shared with Pipeline Talent partners to provide them with information relating to how Users use the Site. This is done for the purpose of providing you with the best and most efficient career management and recruitment services.

Pipeline Talents' web servers gather Users' IP address to assist with the diagnosis of problems or support issues with our services, and to monitor the use of our Site, including the monitoring of the location of our Users.

How do we collect personal information?

We collect personal information in a variety of ways including in forms or surveys filled out by you; when you register on the Site or our mobile applications; in face to face meetings; in email, postal or social media correspondence; in telephone conversations; when you request information; or when you interact with our Site, mobile applications, products, services, content or advertising. We collect most personal information directly from a person, but may also collect personal information from other third-party sources, for example:

- When we receive results of tests and checks (such as a medical test, background check or criminal record check required for a role);
- When we receive a reference about Registered Users;
- When we receive results of inquiries we might make of Candidates' former employers, work colleagues, professional associations or registration body; or
- Information collected from the public domain.

Why do we collect, use and disclose personal information?

The purposes for which we usually collect and use personal information depends on the nature of your interaction with use, but may include:

- To enable access to, interaction with, and use of, our products, services, activities, projects, our websites (including the Site), and mobile applications;
- To inform you of possible job opportunities, relevant candidates, or other relevant events such as training or information sessions communicated to you via direct mail, email or text message;
- To respond to requests for information and other general inquiries;
- To respond to complaints;
- To maintain contact with you and/or keep you informed of our activities, products, services, projects;
- To communicate marketing and promotional information and other information or opportunities that may be of interest to you;
- To operate and improve our functions and activities, products and services, website and mobile applications, and a person's experience and interaction with us, including performing analytics, conducting research and for advertising and marketing;
- To comply with legal obligations.

To whom do we disclose personal information?

We may disclose personal information for the purposes described in this Privacy Policy to:

- Our employees and related bodies corporate;
- To Candidates, Registered Users or Advertisers, as the case may be, where the disclosure is related to the primary purpose of collection, for example, it is necessary to provide you with a product or service which you have requested from us;
- Third party suppliers and service providers (including providers for the operation of our websites, mobile applications and/or our business or in connection with providing our products and services to you);
- Payment gateway providers (e.g. merchants receiving card payments);
- Specific third parties authorised by you to receive information held by us;
- Other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

For Registered Users, the Site offers different privacy control settings for Profiles, which determines how much personal information can be shared with Advertisers. Activation of a Profile is subject to the Registered User's prior consent.

We may disclose personal information outside of Australia, including to third party suppliers, cloud based and other service providers and website hosts located in New Zealand, United States of America, Ireland and India. We will take all reasonable steps to ensure that any overseas recipient deals with such personal information in a way that is consistent with the Privacy Act.

How do we interact with you via our websites and apps?

You may visit our websites without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to us will be managed in accordance with this Privacy Policy.

Our websites use cookies. A "cookie" is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, IP address, pages you have accessed on our websites and on third-party websites. You are not identifiable from such information.

You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.

In addition, when you download, install and/or use our mobile applications, we use third-party software development kits (**SDKs**) and other services which collect information such as patterns of installing mobile applications and re-engagement, which is used to tailor advertisements about Pipeline Talent's mobile apps based on usage preferences of users. You are not identifiable from such information.

You can use the settings within the mobile application to opt-out from the collection and usage of information for advertisement targeting by enabling "Limit Ad Tracking"

(Settings>Privacy>Advertising) on your iOS device or by enabling the “Opting out of interest-based ads” option (Settings>Services>Ads) on your Android device. However, the information collected may continue to be used by us for the estimation of user numbers, advertising fraud detection and debugging.

Third party measurement

We may also share non-personal, de-identified and aggregated information for research or promotional purposes. For example, in order to better understand our users, Pipeline Talent utilises third party measurement companies to assess Site and mobile Site traffic. A tracking code is used to collect the following information on the usage of the Site:

- The number of page views (or page impressions) that occur on the Site;
- The number of unique visitors to the Site;
- How long these unique visitors (on average) spend on the Site when they do visit; and
- Common entry and exit points into the Site.

This aggregated, non-Personal Information is collated and provided to Pipeline Talent to assist in analysing the usage of the Site. This data is also accessible by media organisations and research companies, for the purpose of conducting industry comparisons with other Internet websites.

Can you deal with us anonymously?

We will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for Pipeline Talent to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in our events, programs or activities we manage or deliver.

Do we use your personal information for direct marketing?

We and/or our carefully selected business partners may send you direct marketing communications and information about our products and services, the overall employment market and/or specific segments of the employment market. We may also provide you with selected information about job placement and career-related topics in email communications including in our email newsletter Pipeline Talent News Update.

This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (e.g. an unsubscribe link in the footer of an email or within the Site settings).

From time to time Pipeline Talent may also contact you by telephone. When we speak to you over the phone we may record the calls for training, verification and quality assurance purposes. We will comply with the Do Not Call Register Act 2006 (Cth) and any Personal Information collected on those calls is used in accordance with this Privacy Policy.

Security

We will endeavour to take all reasonable steps to protect personal information, whether held electronically or in hard-copy form, from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

Except in the case of breaches of our obligations under the Privacy Act to protect your Personal Information, Pipeline Talent will not be held responsible for events arising from unauthorised access of your Personal Information. In the event of a data breach, Pipeline Talent is committed to complying in all respects with the requirements of all Australian Privacy Laws. You can also play an important role in keeping your Personal Information secure, by maintaining the confidentiality of any password and accounts used on the Site. Please notify us immediately (through the contact details below) if there is any unauthorised use of your account by any other Internet user, or any other breach of security relating to your account.

Links

Our websites and mobile applications may contain links to sites and embedded content owned and operated by third parties. We do not endorse those linked sites and are not responsible for the privacy practices or policies of those sites, or any content on those sites. We encourage you to review each site's privacy policy, especially if you intend to disclose any personal information via that site.

Access and correction

We will endeavour to keep your personal information accurate and up-to-date. You may request access to the personal information we hold about you. We will provide access to this information where reasonable and practical to do so, and in accordance with the *Privacy Act 1988* (Cth).

Registered Users who have applied for positions on the Site should be aware that the Advertiser to whom their application is sent may also be holding their Personal Information and should you wish to access that information this should be requested directly from those Advertisers.

Changes to this Privacy Policy

We may, from time to time, make changes to this Privacy Policy which we will publish online. Please check our websites regularly for any changes. Any updates will take effect upon first online publication.

How to contact us about privacy

If you have any feedback or questions about this Privacy Statement, the practices of this Site, or your privacy in your dealings with Pipeline Talent, you can contact us in the following ways:

- Email: jobs@pipelinetalent.com.au
- Phone: [02 8001 6603](tel:0280016603)
- Post: User Help Desk, Pipeline Talent Pty Ltd, PO Box 118, Jerrabomberra NSW, 2619, Australia

CROSS CHECK AGAINST OAIC GUIDE <https://www.oaic.gov.au/agencies-and-organisations/guides/guide-to-developing-an-app-privacy-policy>