

DRAKE AUSTRALIA PTY LTD – DRAKE WELLNESS HUB

PRIVACY POLICY

At Drake, your Privacy is important to us.

We respect your personal information and your privacy is important to us. This Privacy Policy explains how we collect personal information and how we maintain, handle, use, store and disclose the personal information we hold. This Privacy Policy covers Drake Australia Pty Ltd (ACN 004 939 771) and all its related companies (“**Drake**”, “**us**”, “**we**”).

Drake is bound by the Australia Privacy Principles (“APP”) under the Privacy Act 1988 (Cth) as amended from time to time in Australia. We give effect to these laws by adhering to the APP in our dealings with your personal information.

This Privacy Policy, may be amended from time to time to as required by law and as such we encourage you to please regularly check our privacy policy so that you are aware of any updates and changes which have been made.

All information which Drake holds will be governed by the latest version of the Drake Privacy Policy.

At Drake, we are committed to protecting the privacy of the information that you provide us with and Drake also aims to be open and transparent about how we manage your personal information.

What types of personal information may we collect and hold?

Personal Information

Under the Privacy Act 1988 (Cth) personal information means information or an opinion about you. The definition of personal information includes information regarding your contact details, work experience, qualifications, aptitude test results, opinions about your work performance (for example your references), incidents at the workplace, and other information obtained or received by us in connection with your possible and actual work placements.

Sensitive Information under the Privacy Act 1988 (Cth), Sensitive information is a special category of personal information. Sensitive information is information or opinion about you, including membership of a professional or trade association or membership of a trade union; criminal record; health information, racial or ethnic origin, political opinions,

membership of a political association, religious beliefs or affiliations, philosophical beliefs, or sexual preferences or practices. As outlined in the Privacy Act 1988 (Cth), sensitive information can, in most cases, only be disclosed with your consent.

Health Information

Health Information is defined under the Privacy Act 1988 (Cth) to mean information or an opinion about, the health or disability (at any time) of an individual; an individual's expressed wishes about the future provision of health services to him or her; or a health service provider, or to be provided, to an individual; this may also be personal information or other personal information collected to provide, or in providing, a health service. As outlined in the Privacy Act 1988 (Cth), health information can, in most cases, only be disclosed with your consent.

How does Drake collect personal information?

The Drake has many services which it provides and Drake will only ask you to provide information that is relevant to the particular service that you have requested Drake to provide. Drake may collect some or all of the following information:

- ID information such as your name, postal address, email, telephone numbers, and date of birth.
- Other contact details or information which is publicly available (for example through social media or the internet).
- Residency or citizenship status (such as, but not limited to whether you are on a visa or citizen of Australia to ensure that you are able to work legally in Australia)
- Qualifications, certificates, accreditation, work history, resume and application forms (this includes any forms that you complete for Drake or any other information you provide in connection with your application)
- References which Drake receives about you.
- Results of inquiries that we might make of your former employers, work colleagues, professional associations, registration body or other entities which have worked with you.

- Results of any competency, medical test, background checks, health questionnaire, psychological tests or personality & behavioural profiles.
- Salary/benefit information, bank account details, tax file number, superannuation fund any other information we require to ensure that you are paid and that Drake complies with its legal obligations where Drake is your employer or your employer outsources their payroll functions to Drake.
- Drivers licence number and other licences as required (for example if you have a forklift licence)
- Information about your hobbies and interests
- Details of any dealings you have with us and/or our clients
- Information we receive about any insurance investigations, claims, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you were involved.
- Information which we receive about a workplace accident in which you were involved.
- Any other additional information about you which you provide to us (including through our website).

If you consent, Drake may also collect sensitive about you, including, your membership in a trade union, health information, information from police checks. It is up to you to choose the information that you give to Drake.

If you choose not to provide Drake with particular information that has been requested:

- Drake may not be best placed to provide the service that you require.
- Drake may be limited in our ability to locate suitable work for you.
- Drake may be limited in our ability to place you in work.

Purposes for which Drake may collect and use your personal information

Drake uses highly skilled consultants to provide permanent recruitment services that respond to the needs of both employers and applicants by helping to place the right person

in the right position. Drake also supplies temporary staffing (contractors) to a wide range of businesses in many industries ("Clients"). Drake also provides services such as training, development and e-learning, assessment and certification, employee assistance programs ("EAP"), career and organisational development, business technologies, outsourcing and outplacements. We use the information we collect to provide these services to clients, job seekers and contractors and to provide training programs. In our permanent recruitment and temporary contracting businesses, the personal information that we collect from you is used to provide recruitment and contracting services, for example, by matching applicants or contractors to clients needs. In our non-recruitment businesses, your personal information is used to enable Drake to deliver the product or services that you require.

Your personal information and sensitive information may also be used in connection with the following purposes:

- For services which you have requested Drake to provide to you
- Your actual or possible work placement
- Career guidance or management
- Your performance appraisals
- Our assessment of your ongoing performance and prospects
- Any test or assessment (including medical tests and assessments) that you might be required to undergo
- Our identification of your training needs
- Informing you of possible work opportunities, relevant candidates, or other events such as training or information sessions by direct mail/email/sms
- Any workplace rehabilitation
- Our management and resolution of any complaint, inquiry or investigation in which you are involved
- Credit checks on potential or existing Clients
- Any insurance claim or proposal that requires disclosure of your personal or sensitive information
- Undertaking criminal reference checks

- For research, development, business systems and infrastructure testing, and other business purposes to assist us in providing our services to you
- Our direct marketing to you about products and services, advise you of industry news and events, promotions and competitions, reports and other information. Where we do send you marketing material, you will be able to unsubscribe from such communication.

Where we collect information from

Drake collects information in a number of ways, including:

- Directly from you, when you provide information by phone, emails or in documents such as an application form or resume.
- Directly from you through our website, when you fill out a form, write a comment, make an enquiry or complaint, fill in an order form or subscribe to our publications, services or marketing and events.
- By contacting the referees that you have nominated
- From clients to whom services are supplied as part of our contracting business
- By searching publicly available information (for example, the internet)

Information collected from visitors to our website (including via mobile access)

When you visit our website, Drake collects information about our website users collectively, which may include data about your location (i.e. city & country), internet browser type, language, operating system, service provider, screen resolution and whether you are visiting for the first time or revisiting our website. This data is anonymously collected and only used in aggregate, and as such no identifying information is collected. Drake uses this data to help us improve our website and it's useability and to help us determine what is most beneficial to our users so that we can provide you with the best possible experience.

Disclosures

To whom do we regularly disclose personal information? We will disclose personal information to Clients for the purpose of recruiting you to specific positions, or for supplying your services to clients as a contractor. We may also disclose your personal information to the following parties outside of Drake:

- Drake's agents, contractors (e.g. people who are authorised to administer our computer systems or to other recruitment suppliers, where we are working on a joint recruitment project), professional advisers, consultants and representatives
- You and your referees in making enquiries
- Your financial institution and others relating to your remuneration and benefits
- Government bodies or others as required/authorised by law
- Drake's related companies and any companies involved in a corporate or business restructure by Drake
- Potential and actual employers, clients of Drake and trusted third parties
- Drake employees and potential employers are located in Australia, New Zealand, Canada, Hong Kong, China, India, Monaco, Switzerland, Philippines, Singapore, South Africa, United Kingdom and United States of America (and any other countries where Drake provide its services in future) regarding possible work placements or to assist us in providing our services to you.
- Referees
- External providers of on-line services such as training and inductions
- Our insurers
- Professional associations or registration body that has a legitimate interest in the disclosure of your personal and sensitive information
- Workers compensation body
- Any person with a lawful entitlement to obtain the information.

Management of personal information held by Drake

Drake's staff members have signed confidentiality agreements and have been provided with privacy training to ensure that they understand Drake's responsibilities under the Privacy Act 1988 (Cth) and their obligation to maintain the confidentiality of your information and respect your rights under the Privacy Act 1988 (Cth). Drake treats all breaches of privacy very seriously, and will result in disciplinary action being taken, dependent upon the severity. Drake has appointed a Privacy Officer to ensure that Drake's management of your

personal information is in accordance with this Privacy Policy and the relevant privacy legislation.

How does Drake store and protect your personal information?

The security of your information is important to us. We make all reasonable efforts to ensure that information is stored securely both in electronic and physical form. To ensure that your personal information is secure, Drake holds your personal information in a combination of secure computer storage facilities, paper-based files and other records. Drake takes the steps which are reasonably necessary to protect your personal information we hold about you from misuse, interference, loss, unauthorised access, modification or disclosure. We may need to maintain records for a significant period of time, due to statutory requirements or as otherwise required, however, when we consider personal information is no longer required, we take reasonable steps to dispose of this information in a secure manner or de-identify the records.

Anonymous/Pseudonym

If you have a general enquiry, you may choose to use a pseudonym or remain anonymous. Drake may not always be able to interact with you in this manner however, especially where it is required by law to identify a person before providing certain information. In general, we won't be able to deal with you anonymously or where you are using a pseudonym when:

- It is impracticable; or
- Where we are required or authorised by law or a court/tribunal order to deal with you personally.

Correcting or updating information held by Drake

Drake takes reasonable steps to ensure that all information we collect, use or disclose about you is accurate, complete and up-to-date. If you believe that there is an error or information is missing please notify our Privacy Officer and we will work with you to correct or add the information as soon as possible.

Access to your personal information

You may access your information at any time (subject to some exceptions allowed by law). If you would like to know what information we hold about you please contact our Privacy Officer. For security reasons, you may be required to put your request in writing. Further, you may be charged a fee for searching for and providing access to your information.

Enquiries and Complaints

You can make enquiries, requests to access/delete or correct your information, or if you believe that our organisation has breached your privacy rights in any way, or you would like to discuss any issues about our privacy policy please contact our Privacy Officer in writing:

- Privacy Officer, Drake Australia Pty Ltd GPO Box 298 Melbourne 3001
- Email: Privacy (email to: melbreception@au.drakeintl.com)

We will try to satisfy any questions or concerns that you have. For more information about privacy in general, you can visit the Office of the Australian Information Commissioner's website <http://www.oaic.gov.au>

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