

Privacy Policy

Last reviewed April 2022 | Due to be reviewed April 2023

Consent

By accessing Compas' website and/or submitting your personal information to Compas through any means, you consent to the use of your information as set out in the policy. If you do not agree with any term of the Policy, please do not use Compas's services or website.

Collecting your personal information

The policy relates to personal information collected by any means. It is Compas' usual practice to collect this personal information directly from you. However, often your personal information is collected using Compas' website or in response to Compas' printed and online advertisements.

Furthermore, there may be occasions when Compas will source personal information from an external third party, or a publicly available source. In these circumstances, Compas will take reasonable steps where practicable to inform you that it has collected personal information from the third party. Third parties operate generally under their own Privacy Policies. Compas strong aligns with these policies.

The type of personal information we collect, and use will depend on various factors such as the type of services you request or use and any applicable legal and regulatory obligations. This may include, but is not limited to, collection and use of the following kinds of information:

- Contact – information that allows us to communicate with you (e.g. e-mail, social media contact details, address, telephone number).
- Identity – information that allows us to identify you (e.g. name, date of birth, occupation, and government-issued identification).
- Professional – information that helps us to understand more about you including your employment history, qualifications, talents, skills, and abilities (e.g. references, resume and qualification documents).
- Financial – information that allows Compas to pay you should you be engaged as an employee or contractor (e.g. bank details, tax details).
- Other individuals – information we request, or that you provide, about an individual other than yourself (e.g. previous employer and referees).
- Immigration – information that allows us to verify that you are legally permitted to work (e.g. evidence of citizenship, visa, or work permit documents).
- As a rule, Compas does not collect sensitive information about you (e.g. health information) unless relevant or necessary for the purposes of providing our services to you. However, in circumstances where Compas requires sensitive information from you, Compas will first seek your consent to collect it.

If you do not provide information, or the information provided is insufficient or inaccurate, Compas will be limited in its ability to provide its services to you.

Use of Personal Information

Compas collects your personal information so that Compas may use this information to:

- Assist you in finding or retaining work.
- Assist in your career performance or management.

- Analyse human resource and labour markets.
- Send you marketing communications and information relating to our services which we think may be of interest to you.
- Develop tests and assessments to place you in appropriate roles.
- Pay you should you be engaged as an employee or contractor.
- Help in work rehabilitation.
- Directly market recruitment services to you (you have a right to opt-out from receiving direct marketing emails); or
- Provide you with Compas' services.
- By accessing Compas websites and/or submitting your personal information to Compas through any means, you consent to the use of your information as set out above.

Use by Third Parties

Compas may use and disclose your personal information to third parties for the purposes it was collected, or for a related or ancillary purpose such as providing you with one of our services. Accordingly, Compas may disclose your personal information to several third parties (located onshore or overseas), including but not limited to:

- Compas' related entities.
- prospective employers.
- clients who may wish to engage your services as a contractor or temporary employee.
- Compas suppliers or service providers, including (but not limited to) organisations that conduct competency or psychometric tests or payroll processing services on behalf of Compas.
- your nominated referees.
- any government authority.
- any law enforcement body, including the police; or
- any educational or vocational organisations to the extent necessary to verify your qualifications.
- If Compas discloses personal information to any third party, Compas will generally require these parties to protect such personal information in the same way that Compas does.

Data Quality

Compas takes reasonable steps to ensure that the personal information it collects is accurate, up to date and complete. In circumstances where your personal information has changed, please contact the Compliance Manager, they will endeavour to update and correct the information in accordance with applicable privacy law. Compas may also contact you from time to time to check the information is still correct.

Data Declaration

Applicants must declare that information provided to Compas is true and correct. This includes the accuracy of dates, employers, skills, and qualifications contained in their resume or CV. A declaration form must be completed and signed during the registration process.

Data Security & Storage

Compas takes reasonable steps to protect the personal information we hold from loss, unauthorised access, and misuse. The use of locks and security systems assist Compas in protecting your personal information. Your personal information may be stored in hard copy

documents, or electronically on Compas' software or systems. When no longer required, personal information is destroyed in a secure manner or deleted.

Information Collected on Compas' Website

Users are advised that there are inherent risks in transmitting information across the internet. The Internet is an open system and Compas cannot guarantee that the personal information you submit will not be intercepted by others. Our websites may include links to external websites operated by other organisations. They may collect personal information from visitors to their site. Compas cannot guarantee the content or privacy practices of any external websites and does not accept responsibility for those websites.

When you access Compas' website, Compas gathers information about users collectively. Such information includes the areas that users visit most frequently, and the services users access the most. Compas will only use such data anonymously and in the aggregate. By doing so, Compas can optimize the services it provides to you.

Compas may also collect personal information that individuals choose to provide via online forms or by email. Any personal information provided online is treated in the same manner as any personal information collected through other means (unless specifically outlined in this Policy).

Use of Cookies

To read Compas' cookie policy and how we use cookies, please request details by emailing office@compas.com.au.

Feedback Submitted to Compas

The Compas website has several areas on the site where you can submit feedback. Compas may use this feedback for marketing purposes, or to contact you for further feedback.

Changes to this Policy

Compas may change this Policy from time to time for any reason and will update the Policy accordingly.

Contacting Compas

Please contact our Compliance Manager at Compas if you have a request relating to any of the following:

- if you would like to access, or correct, your personal information held by Compas.
- if you would like your personal information removed from the Compas database.
- if you would like to opt-out from receiving direct marketing e-mails; or
- any general queries relating to this Policy.
- You may contact Compas' Compliance Manager by email: office@compas.com.au

Privacy Complaints

If you have a privacy related complaint, you may contact the Compliance Manager at the email address set out above. Your email should set out sufficient details of your complaint, including any alleged breach of applicable privacy law.

The Compliance Manager must consider your complaint and will contact you within a reasonable time to advise you of their determination and/or to request further details.

If the Compliance Manager determines that there has been a breach of this Policy, the Compliance Manager will direct Compas to take appropriate steps to rectify that breach and will keep you informed of both the nature of the breach and the steps taken to rectify the breach.

The Compliance will keep a secure record of all complaints.

If you are living or looking for work in New South Wales, we are required by law to advise you of the following:

- we must not charge you a fee for the purpose of finding employment.
- we must not engage in misleading or deceptive conduct (such as advertising a position as being available when we know that no such position exists, or knowingly giving misleading information to you about the nature of a position); and
- if you believe that we have acted inappropriately, you may contact the Office of Fair Trading for information on possible action that may be taken.

RCSA Code for Professional Conduct

Compas Pty Ltd is a corporate member of the Recruitment & Consulting Services Association Australia & New Zealand.

RCSA has a Code for Professional Conduct (the Code) which is authorised by the Australian Consumer and Competition Commission (ACCC). In conjunction with the RCSA Constitution and By Laws, the Code sets the standards for relationships between members, best practice with clients and candidates, and general good order with respect to business management, including compliance. Acceptance of, and adherence to the Code, is a pre-requisite of membership.

RCSA's objective is to promote the utilisation of the Code to achieve self-regulation of the on-hire worker services sector, wherever possible and effective, rather than see the introduction of additional legislative regulation.

Authorised By: **Wayne Murphy**

Position: **Chief Executive Officer**

Date Approved: **22nd April 2022**

Signature: *Wayne Murphy*

Authorised By: **Terry O'Reilly**

Position: **Chief Financial Officer**

Date Approved: **22nd April 2022**

Signature: *Terry O'Reilly*