

Gembridge- Privacy Policy

1.

Introduction

Gembridge Australia Pty Ltd, herein after referred to as “Gembridge”, “we”, “us”, or “our”, (ACN: 92 629 209810) is an executive search & recruitment agency that focuses on the for-purpose sector. We manage roles across leadership, corporate services, fundraising, philanthropy, advancement, marketing, communications & operations. We are committed to providing quality services to our Clients, Candidates and Employees and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information in accordance with the *Australian Privacy Act 1988* and the *Australian Privacy Principles (APPs)*.

You can request a copy of our full policy, or just read the parts that interest you by following the links in this document. We only collect information that is reasonably necessary for the proper performance of our activities or functions. We do not collect personal information just because we think it could be useful at some future stage if we have no present need for it.

Please note that this Privacy Policy includes hyperlinks that provide further detail about the information shared within and will be labelled as such. Clicking one of these links may take you away from our website; or to another section of the Privacy Policy. We do not warrant the accuracy of information on an outside website.

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1.1

APP Entity

Gembridge manages personal information, as an APP Entity, under the [Australian Privacy Principles](#) (APPs (*external link*)).

1.2

Information Flow

We collect personal information that is reasonably necessary for the proper performance and improvement of our **functions** and **activities** as a Recruitment Agency.

When we collect your personal information:

- we check that it is current, complete and accurate. This will sometimes mean that we have to cross-check the information that we collect from you with third parties;
- we record and hold your information securely in a combination of electronic and hard copy files. Some information is stored securely in the cloud or secure data servers; and may be [disclosed to overseas recipients](#);
- we retrieve your information when we need to use or disclose it for our **functions** or **activities**;
- subject to some exceptions and conditions, we permit you to [access your personal information](#) in accordance with APP:12;
- we correct or attach associated statements to your personal information in accordance with APP:13;
- we destroy or de-identify your personal information when it is no longer needed for any purpose for which it may be used or disclosed provided that it is lawful for us to do so.

We do not destroy or de-identify information that is contained in a [Commonwealth Record](#) (*external link*).

2.

Kinds of information we collect and hold

Personal information that we collect and hold, is information that is reasonably necessary for the proper performance and improvement of our **functions** and **activities** as a Recruitment Agency and is likely to differ depending on whether you are:

- a **Workseeker**;
- a **Client**;
- a **Referee**

2.1

For Workseekers

The type of information that we typically collect and hold about Workseekers is information that is necessary to assess amenability to work offers and work availability; suitability for placements; or to manage of the performance in work obtained through us and includes:

- resume provided to us and data extracted from the resume;
- contact details;
- information about personality, character, skills, work experience, qualifications, licences held and career aspirations;
- aptitude and psychometric tests;
- information about your right to work and ability to undertake specific types of work; including details of your visa (if applicable);
- medical and criminal history;

- records supporting vaccination status and medical exemptions to vaccination requirements, if required;
- political opinions; or membership of a political association;
- religious beliefs or affiliations;
- images or photographs;
- work performance, or information about workplace incidents;
- information about memberships (professional and personal);
- notes regarding communication history;
- performance notes regarding placement performance.

2.2

For Clients

The type of information that we typically collect and hold about Clients is information that is necessary to help us manage the presentation and delivery of our services and includes:

- contact details;
- client relationship information;
- information about roles, reporting lines, inter-personal communication, and cultural fit requirements within your organisation;
- information about workplace incidents;
- business, social, or personal interests about which we may be able to provide news and information;
- celebration milestones and dates, preferred social media contact channels, that you choose to share with us.

2.3

For Referees

The types of information that we typically collect and hold about Referees is information that is necessary to help to make determinations about the suitability of one of our Workseekers for particular jobs or particular types of work and includes:

- information relating to your identity (name, job title and organisation);
- your relationship with and knowledge and opinions of our Candidate as relevant to the reference we are seeking;
- other background and contextual information as relevant to the reference we are seeking;
- your contact details for follow up (if necessary);
- confirmation of your identity and authority to provide a reference (if necessary)

3.

Purposes

The purposes for which we collect, hold, use and disclose your personal information are likely to differ depending on whether you are:

- a **Workseeker**;
- a **Client**;
- a **Referee**

The following sections are also relevant to our use and disclosure of your personal information:

- our Policy on [Direct Marketing](#)
- [Overseas Disclosures](#)

3.1

For Workseekers

Information that we collect, hold, use and disclose about Workseekers is typically used for:

- work placement operations;
- recruitment functions;
- any test or assessment (such as aptitude, medical and competency tests) that you might be required to undertake;
- background checks and pre-employment screening;
- staff (Individual, team and organisational) Training and Management;
- insurance purposes; quality and risk management;
- immigration, to verify your working rights status;
- legal compliance and reporting;
- work health and safety operations that ensure the safety of our clients' workplaces as far as is reasonably practicable;
- career guidance, mentoring and management;
- statistical purposes and statutory compliance requirements;
- individual, team and organisational development and improvement;
- performance management for placed candidates.

3.2

For Clients

Personal information that we collect, hold, use and disclose about Clients is typically used for:

- recruitment functions;

- client and business relationship management;
- marketing services to you;
- statistical purposes and statutory compliance requirements;
- insurance purposes; quality and risk management;
- work health and safety operations;
- individual, team and organisational development and improvement

3.3

For Referees

Personal information that we collect, hold, use and disclose about Referees is typically used:

- to confirm identity and authority to provide references;
- for Workseeker suitability assessment;
- for recruitment functions;
- quality and risk management

3.4

Direct Marketing Policy

We may use your personal information to directly market our services; and share news/updates/jobs via a quarterly newsletter.

- newsletters sent via email contain the option to Unsubscribe. Otherwise, you may choose not to consent to direct marketing from us simply by letting us know by phone call, or email;
- on occasion, customer lists may be obtained from third parties for marketing purposes;
- we aim to observe and comply with the requirements of anti-spam legislation

4.

How your personal information is collected

The means by which we will generally collect your personal information are likely to differ depending on whether you are:

- a **Workseeker**;
- a **Client**;
- a **Referee**

We may sometimes collect information from third parties and a range of publicly available sources when it is necessary for a specific purpose such as checking information that you have given us or where you have consented or would reasonably expect us to collect your personal information in this way. Sources may include newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from publicly available sources for inclusion in our records, we will manage the information in accordance with the APPs and our Privacy Policy.

Sometimes the technology that is used to support communications between us will provide personal information to us – see the section in this policy on [Electronic Transactions](#).

Photos & Images

We will not request that you supply photographs, scan photo ID, or capture and retain video image data of you if simply sighting photographs or proof of identity documents would be sufficient in the circumstances.

From time to time, video surveillance that operates in and around our office location, may capture images of you.

In order to conduct video interviews and run training or events via video, Gembridge will use third party supplier of video conferencing services. Our Clients may also request that we set up interviews on their behalf via third party video conferencing services. In either instance, we will seek your consent.

4.1

For Workseekers

Where it is reasonable and practical to do so, we will collect personal information directly from you, in a variety of different ways. Ordinarily, this is when you fill out and submit one of our application forms or any other information in connection with your application to us for work; or request for support during workseeking activities.

Personal information may also be collected when we receive:

- references;
- additional information about you that you or a third party provide to us;
- the results of aptitude, medical and competency tests;
- eligibility to work checks and criminal checks;
- information about any insurance investigation, litigation or professional disciplinary matter or inquiry in which you are involved.

4.2

For Clients

Personal information about you may be collected:

- when you provide it to us for business, or business-related social purposes;
- from social networks or work colleagues;
- when you use our services.

4.3

For Referees

Personal information about you may be collected when you or the Workseeker provide it to us:

- in the course of checking our Workseeker references with you and when we are checking information that we obtain from you about Workseekers

4.4

Electronic Transactions

We conduct transactions electronically as well as in hard copy and by face-to-face measures. It is important that you understand that there are risks associated with the use of electronic technologies and the use of the Internet and you should take all appropriate steps to protect your personal information.

Sometimes we collect personal information that individuals choose to give us via online forms or by email, for example when they:

- register as a site user to access facilities on our site such as job applications;
- make a written online enquiry or email us through our website;
- submit a resume and/or cover letter by email or through our website or associated Job Board which typically include (but not limited to):
 - LinkedIn
 - ProBono

- Ethical Jobs
- Fundraising Institute Australia
- Seek

Some apps and services might invite you to use your social media log-in details (e.g.: Facebook or Google log-in usernames and passwords).

Social Networks and Web Searches

We may collect personal information from social network and media platforms in the course of conducting candidate research and background checks to assess suitability for positions. We also use search engines, such as LinkedIn, by entering your name and relevant identifying details.

Cookies

Our website is hosted by Squarespace and uses cookies and similar technologies, which are small files or pieces of text that download to a device when a visitor accesses a website or app. For information about viewing the cookies dropped on your device, visit [The cookies Squarespace uses](#) (*external link*).

- functional and required cookies are always used, which allow Squarespace, our hosting platform, to securely service this website to you;
- this website uses analytics and performance cookies to view site traffic, activity and other data

Emails, calls and message logs

Our technology systems log emails, telephone call and messages received and sent.

Paperless Office

As a certified B-Corp organisation, we aim to meet the highest standards of social and environmental performance. We, therefore, choose to run a partially paperless office, which means, in instances where you share paper-based communications with us, they may be digitised and retained in digital format.

The paper-based communications may be confidentially retained, archived or destroyed as required. Where you have provided an original paper-based document, we will return them to you once they are no longer required by us for the purpose for which they may be used or disclosed.

5.

How your personal information is held

Information about our Clients and Candidates may be securely stored in a combination of electronic and hard copy files. Information is held until it is no longer needed for any purpose for which it may be used or disclosed at which time it will be de-identified or destroyed provided that it is lawful for us to do so.

We take a range of [Information Security](#) measures to protect your personal information from:

- misuse, interference and loss; and
- unauthorised access, modification, or disclosure

5.1

Information Security

We take a range of measures to protect your personal including but not limited to:

- staff training;
- password protection and multi-factor authentication on devices that store digital information;
- clean-desk policies;
- policies on laptop and mobile phone security;
- culling procedures including shredding and secure disposal of paper-based information.

5.2

Data Breach Notifications & Response

In the event of a data breach, we would respond by measures appropriate to the nature and seriousness of the breach and the size and resources of our organisation taken in accordance with the [four steps](#) (*external link*) set out in the OAIC's data breach notification guidance and advice.

6.

Disclosures

We may disclose your personal information for any of the [purposes](#) for which it is primarily held or for a lawful [related purpose](#).

We may disclose your personal information where we are under a legal duty to do so.

Disclosure will usually be:

- internally;
- to our Clients;
- to our Referees for suitability and screening purposes;
- to our contracted service providers, insurers, professional advisors and others with a proper interest in receiving your personal information for a lawful related purpose

6.1

Related Purpose Disclosures

We outsource a number of services to contracted service suppliers (CSPs) from time to time.

Our CSPs may see some of your personal information. Typically, our CSPs would include:

- software solutions providers;
- legal and other professional advisors;
- insurance brokers, loss assessors and underwriters;
- superannuation fund managers;
- background checking and screening agents

We take reasonable steps to ensure that terms of service with our CSPs recognise that we are bound to obligations to protect the privacy of your personal information and that they will not do anything that would cause us to breach those obligations.

6.2

Overseas Recipients

Some of your information is likely to be transferred to, and stored, at destination outside Australia, New Zealand, UK or the European Economic Area (“EEA”) that does not have a similar standard of protection.

We cannot guarantee that any recipient of your personal information will protect it to the standard to which it ought to be protected. The costs and difficulties of enforcement of privacy rights in foreign jurisdictions and the impracticability of attempting to enforce such rights in some jurisdictions will mean that in some instances, we will need to seek your consent to disclosure.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

7.

Access and Correction

Subject to some exceptions set out in privacy law, you can gain access to your personal information that we hold.

Important exceptions include:

- Evaluative opinion material obtained confidentially in the course of our performing reference checks; and access that would impact on the privacy rights of other people

In many cases, evaluative material contained in references that we obtain will be collected under obligations of confidentiality that the person who gave us that information is entitled to expect will be observed. We do refuse access if it would breach confidentiality.

7.1

Access Policy

If you wish to obtain access to your personal information you should [contact our Privacy Officer](#). You will need to be in a position to verify your identity.

Consistent with guidance and advice provided by the **Office of the Australian Information Commissioner (OAIC)**, we may impose a charge (provided it's not excessive) for retrieving and providing access to your personal information.

Any such charge would be calculated having regard to:

- our staff costs in searching for, locating and retrieving the requested personal information, and deciding which personal information to provide to you;
- our staff's costs in reproducing and sending the personal information

7.2

Correction Policy

If you find that personal information that we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to correct it by contacting us.

We will take such steps as is reasonable in the circumstances to correct the information to ensure that, having regard to the [purpose](#) for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

If we have disclosed personal information about you that is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to notify the third parties to whom we made the disclosure and we will take such steps (if any) as are reasonable in the circumstances to give that notification unless it is impracticable or unlawful to do so.

You can also find out information about our [Data Breach Response and Notification Procedures](#).

8.

Feedback or Complaints

You have a right to complain about our handling of your personal information if you believe that have interfered with your privacy.

For more information, see our [Complaints Procedure](#).

8.1

Complaints Procedure

If you wish to make an enquiry or register a complaint about our handling of your personal information, you should [contact our Privacy Officer](#) during our normal office hours.

We aim to acknowledge receipt of all complaints within 10 working days and aim to resolve all complaints within 30 working days. This may not be possible in all circumstances, depending on the contents of the complaint. In this situation, we will respond to your complaint in a reasonable time and keep in touch as necessary.

If you are not satisfied with our response to your complaint, you may contact the **Office of the Australian Information Commissioner (OAIC)** through the Commission's [website](#) (*external link*) and the means set out there.

Complaints may also be made to the **Recruitment, Consulting & Staffing Association (RCSA)** (*external link*), the industry association of which we are a member.

RCSA administers a [Code of Conduct](#) (*external link*) for the professional and ethical conduct of its members.

The RCSA Code is supported by rules for the resolution of disputes involving members.

When we receive your complaint:

- we will take steps to confirm the authenticity of the complaint and the contact details provided to us to ensure that we are responding to you or to a person whom you have authorised to receive information about your complaint;
- upon confirmation, we will write to you to acknowledge receipt and to confirm that we are handling your complaint in accordance with our policy;
- we may ask for clarification of certain aspects of the complaint and further detail;
- we will consider the complaint and may make inquiries of people who can assist us to establish what has happened and why;
- we will require a reasonable time (usually 30 days) to respond;
- if the complaint can be resolved by procedures for [access and correction](#), we will suggest these to you as possible solutions;
- if we believe that your complaint may be capable of some other solution, we will suggest that solution to you, on a confidential and without prejudice basis in our response;

- if the complaint cannot be resolved by means that we propose in our response, we will suggest that you take your complaint to any recognised external dispute resolution scheme to which we belong or to the Office of the Australian Information Commissioner.

8.2

Changes to our Privacy Policy

This Policy may change from time to time and is available on our website. We may make urgent changes to this policy when we believe it is reasonable to do so e.g., to comply with legal or regulatory requirements. Please check back to see any updates or changes.

9.

Contact Details

Privacy Officer

Normal office hours are Monday – Friday, 9:00 am – 5:00 pm (Australian Eastern Standard Time)

Email: info@gembridge.com.au

Phone: 03 8375 9661

You may also contact us through our website here:

<https://www.gembridge.com.au/contact-us>