

Insource Holdings Limited Privacy Policy as at 17 September 2019

1. Privacy statement

Insource Holdings Limited ('Insource', 'we', 'us', or 'our') is committed to protecting your personal information. We have developed this privacy policy to describe what personal information we collect, when we collect it, what we use it for and who we may disclose it to, and to ensure that we comply with our obligations to you under the Privacy Act 2020.

'Personal information' is information about an identifiable individual (a natural person) which is in a form which enables that person to be identified.

Our privacy policy is provided for your information and doesn't limit or exclude your rights under the Privacy Act 2020, of which you can get more information at www.privacy.org.nz. If you have any questions or concerns regarding this policy, please contact us.

In general, we collect personal information to conduct our business, to provide and market our services and to meet our legal obligations.

2. What kinds of personal information do we collect?

In general, and depending upon the nature of your connection with us, the type of personal information we collect and hold includes (but is not limited to): names, gender, addresses, residential history (i.e. hometown), contact details, occupations, personal preference payment details, employment history, work experience, education and qualifications (including academic transcripts), testimonials and feedback, working visas, opinions and publications, and other information which assists us in conducting our business, providing and marketing our services and meeting our legal obligations.

In some cases, if personal information we request is not provided, it might adversely impact our ability to supply the relevant product or service or to perform our obligation.

3. How will we collect your personal information?

Generally, we will collect personal information directly from you. For example, we collect personal information when you:

- directly provide your details to us;
- deal with Insource Holdings Limited in person, by telephone, face to face meetings, interviews, letter, forms, fax, email, provision of business cards, and via our website and social media channels;
- supply a CV, academic transcript, or application form;
- fill out and submit a registration form;
- subscribe to job alerts emails;
- submit any other information in connection with your application for registration; or
- complete psychometric assessments.

We will generally only request personal information about you from third parties (that is not publicly available) with your consent and this will generally be for verification or vetting purposes. Types of personal information about you that we may request from third parties could be (but are not limited to):

- any references about you;
- results of enquiries of former employers, work colleagues, professional associations or registration bodies;
- the results of any psychometric, competency or medical test;
- performance feedback (whether positive or negative);
- any complaint from or about you in the workplace;
- any information about a workplace accident in which you are involved;
- any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved;
- probity history (sourced from credit checks);
- criminal history;
- education history;
- information from website and social media analytics and cookies.

Other personal information about you may be collected from publicly available material, including websites or other public forums, for example, company websites, the Register of Lawyers or other social media sites where you are profiled publicly.

4. Why do we collect personal information?

In general, we collect, hold, use and disclose your personal information in order to:

- conduct our business;
- provide and market our services to you, including recruitment and consulting services;
- pool and draw inferences from you;
- market our services;
- engage third parties on your behalf;
- communicate with you;
- bill you;
- pay Insource Holdings Limited employees;
- help us manage and enhance our services;
- conduct general administrative or business matters;
- comply with our legal obligations; and
- carry out any other purpose that is advised to you.

5. To whom may we disclose your personal information?

We may disclose your personal information:

- to employees within Insource Holdings Limited;
- to other companies or individuals who assist us in providing services or who perform functions on our behalf (such as mailing houses, hosting and data storage providers, legal counsel, specialist consultants and other business advisors);
- to anyone else to whom you authorise us to disclose it; and
- where we are required to do so by law.

We may also disclose certain personal information to Insource Holdings Limited's clients who have engaged us to perform recruiting services. Where personal information is disclosed to Insource Holdings Limited's clients, the personal information is either publicly available at the time of disclosure, or has not been determined by you as confidential.

6. Management of personal information

We take reasonable steps to protect the security of your personal information. Our personnel are required to respect the confidentiality of personal information and the privacy of individuals.

We take reasonable steps to protect personal information held by us from misuse and loss and from unauthorised access, modification or disclosure, for example by use of physical security and restricted access to electronic records. We use data hosting service providers in New Zealand, Australia and the United State to host our data, and we use industry standard measures to secure your data.

Where we no longer require your personal information, we will comply with our legal obligations in respect of that information.

7. How can you access and correct your personal information?

We endeavour to ensure that the personal information we hold is accurate, complete and up-to-date. We encourage you to contact us in order to update any personal information we hold about you. You have the right to correct any personal information we hold about you in accordance with the Privacy Act.

Subject to the exceptions set out in the Privacy Act, you may seek access to the personal information which we hold about you by contacting our Privacy Officer, Jenn Little (+64 21 611 416).

We will require you to verify your identity and to specify what information you require. A fee may be charged for providing access to your personal information. If a fee is to be charged, we will advise you of the likely cost in advance.

8. How can you make a privacy complaint?

If you have any queries, concerns or complaints regarding Insource Holdings Limited's privacy policy or Insource Holdings Limited's handling of your personal information these should be raised in the first instance with our Privacy Officer. We may ask you to lodge your complaint in writing. Any complaint will be investigated by the Privacy Officer and you will be notified of the decision in relation to your complaint as soon as practicable after it is made, usually within 20 working days.

If you are not satisfied with our response you can refer your complaint to the Privacy Commissioner by contacting the Office of the Privacy Commissioner at: PO Box 10-094, The Terrace, Wellington 6143, phone 0800 803 909, <http://privacy.org.nz/>.

9. Updates to this policy

Our privacy policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices, and the changing business environment. Where a review of our privacy policy results in changes to the policy, we will advise you of any alterations by notice on the Insource Holdings Limited website.

The most current version of this policy is located at www.insource.nz.

This privacy policy was last updated: October 2020.