



# Privacy Policy

## Australia

Insource Holdings Limited Privacy Policy as at 16 August 2023

### 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 1988 (Cth) (Privacy Act).

*'Personal information'* is defined under the Privacy Act. Generally, it is information about an individual (a natural person) which is in a form which enables that person to be identified or reasonably identifiable. Some types of personal information are designated as *'sensitive information'*, which are subject to additional protection under the Privacy Act. For example, these can include information about your membership to a particular professional or trade association or health information.

Our privacy policy is provided for your information and does not limit or exclude your rights under the Privacy Act, of which you can get more information at <https://www.oaic.gov.au/>. If you have any questions or concerns regarding this policy, please our Privacy Officer.

### 2. What kinds of personal information do we collect?

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

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 and practising certificate details), testimonials and feedback, awards, working visas, opinions and publications, languages, and other information which assists us in conducting our business, providing and marketing our services and meeting our legal obligations.

We collect certain types of sensitive information about you, including:

- results of any psychometric, competency or medical test;
- information about a workplace accident in which you are involved;
- 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); and
- criminal history.

We also collect technical information and general analytics, such as web browser type and browsing preferences, Internet service provider, referring/exit pages, and date/time stamps, IP address, time zone, and geolocation data (if applicable) arising from your use of our website.

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;
- submit any other information in connection with Insource's business activities; or
- complete psychometric assessments.

We 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, including performance feedback and complaints; or
- results of probity checks, including your psychometric, competency or medical tests, criminal history checks, education history checks.

We also collect personal information about you from publicly available material, including websites or other public forums, for example LinkedIn, company websites, the Register of Lawyers, social media sites, or online and printed publications where you are profiled publicly.

We also use the cookies and similar technologies to collect technical information and general analytics.

### 4. Why do we collect personal information?

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

- conduct our business;
- provide and market our services to you;
- pool and draw inferences from you;
- 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.

We may also use your personal information for other purposes to which you have consented, or as otherwise permitted or required by law.



Technical information and general analytics is used for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are on our website, and to improve our website and our services.

#### **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 accounting services, 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.

Where personal information is disclosed by Insource Holdings Limited, the personal information is either publicly available at the time of disclosure or has not been notified by you to Insource Holdings Limited as confidential. We will not disclose personal information that you have determined as sensitive or confidential without your consent.

If we disclose your personal information to third parties, we will use reasonable commercial efforts to ensure that such third parties only use your personal information as reasonably required for the purpose of disclosure and in a manner consistent with applicable laws, for example (where commercially practical) by including suitable privacy and confidentiality clauses in our agreement with a third party service provider to which we disclose your personal information.

#### **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. If an eligible data breach occurs with respect to your personal information, we will comply with our obligations to notify you and the Privacy Commissioner in accordance with the Privacy Act.

We use data hosting service providers in New Zealand, Australia, and the United States to host our data, and we use industry standard measures to secure your data. Except where an exception applies under the Privacy Act or other relevant legislation, we will take commercially reasonable steps to ensure that overseas recipients to whom we disclose personal information do not breach the Australian Privacy Principles stated in the Privacy Act, in relation to such information.

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

#### **7. Direct marketing communications**

We will only send you direct marketing communications (either through mail, SMS, or email), including offers, promotions, or events, where you have consented to do so. You may opt-out of receiving direct marketing communications at any time by contacting us or by using opt-out facilities provided in the direct marketing communications.

#### **8. 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 to update any personal information we hold about you. You have the right to access and/or 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 or correction of the personal information which we hold about you by contacting our Privacy Officer.

**Privacy Officer:** Simon Christie, Chief Product and Operations Officer  
**Email:** [simon@insource.nz](mailto:simon@insource.nz)  
**Address:** Insource, Level 27, 101 Collins Street, Melbourne

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.

**9. 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. We will aim to resolve any issue in a timely and efficient manner.

If you are not satisfied with our response, you can refer your complaint to the Privacy Commissioner at the Office of the Australian Information Commissioner – contact details are available at <https://www.oaic.gov.au/about-us/contact-us/>.

**10. Exemptions and inconsistency with law**

Where the Privacy Act or other laws allow for an exemption to comply with certain legal obligations (for example, the employee records exemption in the Privacy Act), we may rely on such an exemption.

This privacy policy will not apply to the extent that it is inconsistent with any applicable law.

**11. 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 <https://insource.nz/privacy>.

Your continued dealings with us, for example use of our website or services, will signify your agreement to this privacy policy as amended.

**12. How to contact us**

If you have a query, concern, or complaint about the manner in which your personal information has been collected or handled by us, please contact our Privacy Officer.

**Privacy Officer:** Simon Christie  
Chief Product and Operations Officer  
**Email:** [simon@insource.nz](mailto:simon@insource.nz)  
**Address:** Insource, Level 27, 101 Collins Street, Melbourne

This privacy policy was last updated: 16 August 2023