



# Privacy Policy for the professionals on the Insource database as at 16 August 2023

## New Zealand & Australia

### 1 Privacy statement

Insource Holdings Limited ('Insource', 'we', 'us', or 'our') have developed this privacy policy to describe what personal information we collect, how we collect it, how we hold it, what we use it for, and who we may disclose it to, to ensure that we comply with our obligations to you under the New Zealand Privacy Act 2020 and the Australian Privacy Act 1988 (Cth) (Privacy Act).

*'Personal information'* is information about an identifiable individual (a natural person) which is in a form where that person can be identified or reasonably identifiable. Some types of personal information are designated as *'sensitive information'*, which are subject to additional protections. For example, sensitive information 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. You can get more information at [www.privacy.org.nz](http://www.privacy.org.nz) or <https://www.oaic.gov.au/>.

If you have any questions or concerns regarding this policy, please contact our Privacy Officer.

**Privacy Officer:** Simon Christie, Chief Product and Operations Officer  
**Email:** [simon@insource.nz](mailto:simon@insource.nz)  
**Address:** New Zealand : Insource, Level 26, 188 Quay Street, Auckland  
Australia : Insource, Level 27, 101 Collins Street, Melbourne

### 2 Why do we collect your personal information?

We collect, hold, use, and disclose your personal information to develop and maintain a searchable talent database. We use your personal information to provide our service, market our product and service, and to improve our product and service. We will only use your personal information for the purpose of which it was collected and comply with legal requirements.

The database contains collated personal information of more than 100,000 lawyers and legal executives who hold or have held a practicing certificate in either New Zealand or Australia. Our customers are law firms and in-house legal teams who access the database for recruitment purposes. The database provides customers with visibility of the legal talent pool so they can quickly identify candidates for live vacancies, build future talent pipelines, maintain relationships with their alumni, and get insights into the movement and composition of talent.

### 3 How do we collect your personal information?

Insource indirectly collects and obtains your personal information from publicly available sources. We use both automated and manual collection methods. The personal information we collect and obtain is personal information that you have made publicly available or have given consent to being publicly available via third party websites.

### 4 What kinds of personal information do we collect?



We may collect or obtain personal information about you from sources including:

- **personal information you make public** on professional social media sites, employer websites, regulatory bodies, publications, or public directories.
- **third party websites** who supply publicly available records such as regulatory bodies.

The categories of personal information we may collect and obtain includes:

- **personal details:** given name(s) and title.
- **current contact details:** your publicly available address, telephone number(s) (main switchboard, direct dial, mobile), and email address.
- **employment details:** your past and current work experience including employer name, office address(es), telephone number(s), email address, job title/position, and length of employment.
- **professional qualifications, memberships, and regulatory status:** your professional qualifications, post admission experience, and any other details relating to your professional standing or regulated status.
- **professional expertise:** information relating to your professional experience sourced from professional social media sites, employer websites, regulatory bodies, publications, directories, including links to the source websites.
- **URLs:** public URLs from professional social media sites, regulatory body profiles, and employer website pages.

We do not seek to collect your sensitive personal information.

## 5 Who will we disclose your personal information to?

We may disclose your personal information to:

- employees within Insource Holdings Limited;
- contractors of Insource Holdings Limited;
- customers of Insource Holdings Limited (such as law firms, in-house legal teams, freelance recruiters);
- service providers (such as hosting and data storage providers, specialist consultants, and other business advisors);

and we may disclose your personal information where required by law.

Your personal information may be disclosed to Insource customers who operate in both New Zealand and Australia.

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 to which we disclose your personal information.

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

## **6 Management of personal information**

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 restricted access to electronic records. If an eligible data breach occurs with respect to your personal information, we will comply with our notifiable obligations in accordance with the relevant legislation.

Insource employees and contractors are required to respect the confidentiality of personal information and the privacy of individuals.

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. 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 New Zealand or Australian Privacy Principles, 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**

Generally, Insource does not send you direct marketing communications. If we do, 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. You have the right to correct any personal information we hold about you in accordance with the Privacy Act and we encourage you to contact us to access and update any personal information we hold about you.

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.

## **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, usually within 20 working days.

If you are not satisfied with our response, you can refer your complaint by contacting:

— **New Zealand**

Privacy Commissioner, Office of the Privacy Commissioner at PO Box 10-094, The Terrace, Wellington 6143, phone 0800 803 909, <http://privacy.org.nz/>.



— **Australia**

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, 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, alterations made and will be available on the Insource Holdings Limited website.

**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:

**Privacy Officer:** Simon Christie, Chief Product and Operations Officer

**Email:** [simon@insource.nz](mailto:simon@insource.nz)

**Address:** Insource, Level 26, 188 Quay Street, Auckland

This privacy policy was last updated: 16 August 2023