Perks
People
Solutions

Privacy Policy

Our Commitment

Perks People Solutions (PPS) is committed to protecting your personal information and handling it in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

This Privacy Policy outlines how we collect, use, disclose and manage personal information while providing our recruitment, HR consulting and related services.

Further information about privacy in Australia is available from the Office of the Australian Information Commissioner at oaic.gov.au.

What is Personal Information?

Personal information is any information or an opinion (whether true or not) about an identified individual, or an individual who is reasonably identifiable.

This may include, but is not limited to:

- Name and contact details;
- Employment history and qualifications;
- Performance and reference information;
- Information relating to work placement and suitability for roles;
- Sensitive information such as health or medical information (where required with consent);
- Information relating to workplace investigations, mediation, workplace grievances, complaints, employment conduct, workplace relationships or dispute resolution matters.

Collection of Personal Information

We collect personal information directly from you where possible, including when you:

- Apply for a role or submit a resume;
- Attend an interview;
- Communicate with us via email, phone or other channels;
- Participate in assessments or testing.

We may also collect information from third parties, including:

- Referees;
- Previous employers;
- Professional associations or registration bodies;
- Clients and prospective employers;
- Publicly available sources.

Notification at Collection

When collecting personal information, PPS takes reasonable steps to notify you of relevant matters or otherwise ensure you are aware of them. This may occur through this Policy, a collection notice, an application form, correspondence, a verbal explanation or another appropriate method.

Purpose of Collection and Use

We collect and use your personal information for purposes including:

- Assessing your suitability for employment or placement;
- Facilitating recruitment and placement services;
- Contacting you regarding job opportunities;
- Managing payroll and employment related services;
- Conducting performance assessments and employment related activities;
- Managing workplace investigations, mediation, workplace grievances, complaints, dispute resolution processes and related workplace matters;
- Complying with legal obligations;
- Managing client and prospective client relationships, developing business opportunities and providing information about PPS services, subject to applicable privacy and electronic marketing requirements.

We will only use personal information for the purpose for which it was collected, unless:

- You have consented to another use, or;
- The use is otherwise permitted by law

Disclosure of Personal Information

We may disclose your personal information to:

- Current or prospective employers and clients;
- Referees;
- Service providers and contractors, including IT and payroll providers;
- Insurers and professional advisers;
- Regulatory or government bodies where required by law;
- Legal, workplace relations, mediation, investigation or dispute resolution advisers, where required to provide or support relevant services;
- PPS is part of the broader Perks group of businesses and uses certain shared corporate, technology, risk, compliance and administrative services provided within the Group. Where reasonably necessary, PPS may share personal information with another Perks entity to provide requested services, manage a referral, support Group operations or meet legal and compliance obligations. Access is limited to personnel who require the information for an authorised purpose.

We take reasonable steps to ensure that any third party that receives personal information handles it in accordance with the Australian Privacy Principles.

Use of Artificial Intelligence (AI)

We may use approved AI-enabled tools to assist in the delivery of our services, including preparing, analysing, summarising, or processing information.

Where AI tools are used, personal information and, in some cases, sensitive information may be processed within these tools. We only use AI tools that have been approved through Perks' governance and risk assessment processes, and which operate within secure environments with appropriate confidentiality, security and data protection controls.

Any output generated with the assistance of AI is subject to human review before it is relied on or provided to you.

Some AI tools may store or process information outside Australia. This may include storage, processing, support, maintenance, backup, or access by authorised personnel located outside of Australia. Where this occurs, this is addressed in the Overseas Disclosures section of this Policy.

Personal information must not be entered into personal, consumer or otherwise unapproved AI accounts or tools. Publicly available information may only be searched or collected for a legitimate and reasonably necessary business purpose, using methods approved by Perks.

Perks maintains policies, standards and governance processes relating to the acceptable use of AI and emerging technologies.

Overseas Disclosures

Some service providers and systems used by PPS to support our operations, including cloud-based recruitment, CRM, email, document management and IT systems, may be located outside Australia or may allow access to personal information from overseas.

Personal information may be stored in, or accessed from, countries outside Australia. Based on the systems currently used, or proposed to be used by PPS, this includes the Netherlands, where data held in PPS recruitment and CRM systems may be stored.

PPS also uses shared Perks systems and technology environments, including Microsoft systems used across the Perks Group. Where PPS information is stored in, accessed from, or processed through those shared systems or related service providers, personal information may also be disclosed in the overseas locations relevant to those systems and providers.

Based on the systems and service providers currently used by Perks, personal information may be stored in, or accessed from, countries including Canada, Hong Kong, New Zealand, the Philippines, Singapore, South Korea, the United Kingdom, the United States of America and Vietnam.

Where personal information is disclosed overseas, we take reasonable steps to ensure that the information is handled in a manner consistent with Australian privacy requirements. These steps may include contractual obligations, approved systems, access controls, security safeguards and limiting access to authorised personnel.

Recording of Meetings and Calls

We may record client, candidate or business meetings where reasonably necessary for an approved business purpose. This may include maintaining accurate records, supporting service delivery, preparing file notes, evidencing communications or assisting with follow-up actions.

We will obtain your consent before recording a meeting. If consent is not provided, the meeting will not be recorded.

Approved tools may be used to record, transcribe or summarise meetings. Where AI-enabled functionality is used, this is handled in accordance with the Use of Artificial Intelligence section of this Policy.

Recordings, transcripts and summaries may contain personal information and, in some cases, sensitive information. They will only be created using approved systems, stored securely within approved environments, and are not downloaded to personal devices or stored outside approved systems.

Recordings, transcripts and summaries may be retained while they remain reasonably necessary for PPS's recruitment, candidate management, HR consulting or related business activities, including appropriate candidate re-engagement. PPS periodically reviews whether continued retention remains necessary. When the information is no longer needed for a purpose for which it may be used or disclosed under the Privacy Act, PPS takes reasonable steps to destroy or de-identify it, unless retention is required by Australian law or a court or tribunal order.

Security of Your Personal Information

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure. Personal information is treated as confidential, and sensitive information is handled with additional care.

Personal information may be held in secure cloud-based systems, software platforms, document management systems, and physical records. Security measures include, but are not limited to:

- Secure cloud-based systems;
- Controlled system access;
- Access limited to authorised personnel;
- Data backup and monitoring;
- Physical security controls;
- Staff confidentiality obligations.

Personal information is retained only for as long as necessary to fulfil the purposes for which it was collected or as required by law.

Retention periods may vary depending on the nature of the information, the services provided and applicable legal, regulatory or professional requirements. When personal information is no longer

required, we will take reasonable steps to destroy or de-identify it securely, unless we are required or authorised to retain it.

Data Breaches

If a data breach occurs, we will take reasonable steps to assess, contain and respond to the incident.

Where a data breach is likely to result in serious harm, we will respond in accordance with applicable privacy laws, including the Notifiable Data Breaches scheme, where required. This may include notifying affected individuals and the Office of the Australian Information Commissioner.

Access and Correction

You may request access to your personal information at any time. You may also request correction of your personal information if you believe it is inaccurate, incomplete or out of date.

We will respond to access and correction requests within a reasonable timeframe, typically within 30 days. We may require proof of identity before providing access or making a correction.

In limited circumstances, access may be refused where permitted by law. If this occurs, we will provide reasons where it is reasonable and appropriate to do so.

Direct Marketing

Where permitted by law, we may use your personal information to provide information about our services, service updates, newsletters, events, insights and related communications that may be relevant to you.

You may opt out of receiving direct marketing communications at any time by contacting us or using the unsubscribe mechanism provided. We will action opt-out requests promptly and, for electronic marketing communications, within 5 business days.

We maintain a record of individuals who have opted out of receiving direct marketing communications.

Dealing With Us Anonymously

You may deal with PPS anonymously or by using a pseudonym where lawful and practicable, such as when making a general enquiry. PPS will usually need your identity to provide recruitment, placement, HR consulting or related services.

Complaints Resolution

If you wish to complain about any breach or potential breach of this Privacy Policy or the Australian Privacy Principles, you should contact us via the details contained in the "Contact Us" section of this Policy and request that your complaint be directed to the Privacy Officer.

We will acknowledge your complaint within 5 business days and aim to investigate and respond as soon as reasonably practicable. Where additional time is required, we will keep you informed of progress.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate your complaint further.

Contact Us

If you seek any further information from us about this Policy, wish to access or correct your personal information, opt out of direct marketing, or make a complaint, please contact our Privacy Officer:

Privacy Officer

Address:	8/81 Flinders Street Adelaide SA 5000
Telephone:	(08) 8273 9300
E-mail:	info@ppsconsulting.com.au