

Privacy Statement

COCEPTIVE CONSULTING GROUP

1. Introduction

Coceptive Consulting Group respects the confidentiality of information and the privacy of individuals and manages personal information in accordance with the Privacy Act 1988 and Australian Privacy Principles. This policy applies to information collected by Lambert Willcox Group Pty Ltd trading as Coceptive Consulting Group (ACN 652 280 423). It outlines how we collect personal information and how we maintain, use, store and disclose the personal information we hold and reflects our commitment to you.

The Coceptive Consulting Group Privacy Policy will be reviewed and updated from time to time to consider new laws, technology, changes to our operations and practices and to make sure it remains appropriate to the ever-changing landscape. Please regularly check our Privacy Policy so that you are aware of these updates and changes. Any information we hold will be governed by the most current version of the Coceptive Consulting Group Privacy Policy, which is available at any time on the Coceptive Consulting Group Website.

2. Kinds of Information We Collect

For **Candidates** it includes information regarding your contact details, employment history, qualifications, aptitude/psychometric test results, opinions about your work performance (e.g. references), incidents at workplace, and other information obtained or received by us in connection with your possible and actual work placements.

For **Clients** it includes information regarding your company contact details, employee details, job descriptions, conversation logs, proposals for recruitment assignments, billing details and records, and other information obtained or received by us in connection with managing the presentation and delivery of our service to you.

For **Referees** it includes information regarding your contact details, employment experience and the relationship to the Candidate along with any other information obtained or received by us in connection with the verbal or written reference.

3. Sensitive Information

Sensitive Information is a special category of personal information under the Privacy Act 1988. It is information or opinions about you, including membership of a professional or trade association or membership of a trade union; criminal record; health information, racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, and sexual preferences or practices. As outlined in the Privacy Act 1988, sensitive information can, in most cases, only be disclosed with your consent.

4. Purposes and Use for Which We Collect Personal Information

For **Candidates**, information that we collect, hold, use and disclose is typically used for work placement operations, recruitment functions, statistical purposes, and statutory compliance requirements, client requests for contact details, service standard surveys for post registration functions, referral of candidates to clients (with candidates permission), and direct marketing services.

For **Clients**, information that we collect, hold, use and disclose is typically used for client and business relationship management, recruitment functions, direct marketing services, statistical purposes and statutory compliance requirements, service standard surveys for post recruitment functions.

For **Referees**, information that we collect, hold, use and disclose is typically used to confirm the identity and authority to provide references, candidate suitability assessments, validation of candidate provided information, recruitment functions.

If you do not give us the information, we seek we may be limited in our ability to act and provide recruitment services to you.

5. How Your Personal Information Is Collected

Personal information from **Candidates** will be collected from you directly when you fill out and submit one of our application forms or any other information in connection with your application to us for work.

Personal information about **Clients** may be collected when you provide it to us for business- or business-related social purposes.

Personal information about **Referees** may be collected when you provide it to us in the course of us checking candidate references with you and when we are checking information that we obtain from you in relation to a candidate.

We may also collection personal information about **Candidates, Clients and Referees** from a range of publicly available sources including 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.

6. Electronic Transactions

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

- Request to be included on email lists such as job notifications or exceptional candidate summary reports; and
- Send general applications via our website or other job boards.

It is important that you are aware of the risks associated with use of the Internet, and you should ensure that you are undertaking appropriate measures to protect your personal information.

7. Social Media & Web

Coceptive Consulting Group utilises both internet search engines, and social media to conduct relevant background checks. These may include details such as your name, or any other applicable identifying details.

8. General Information Collected from Visitors to Our Website

Users are advised that there are inherent risks in transmitting information across the internet. The Internet is an open system and Coceptive Consulting Group cannot guarantee that the personal information you submit will not be intercepted by others. Our websites may include links to external websites operated by other organisations. They may collect personal information from visitors to their site. Coceptive Consulting Group cannot guarantee the content or privacy practices of any external websites and does not accept responsibility or liability for those websites.

9. Website Analytics

To improve your experience on our site, we may use 'cookies'. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website.

Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of such other sites. When you go to other websites from here, we advise you to be aware and read their privacy

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

By using this website, you consent to the processing of data about you by Google in the manner described in [Google's Privacy Policy– external site](#) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or [use the opt-out service provided by Google– external site](#).

10. Direct Marketing

If you have provided your personal details to Coceptive Consulting Group, we may use personal information to send you direct marketing material, but only subject to the following:

- Your personal information is only used for marketing purposes to allow Coceptive Consulting Group to provide:
 - Candidates with updates in relation to employment opportunities, market information and promotions
 - Clients with market information and promotions
 - Your personal information is not used by or disclosed to any third party for marketing purposes
 - Client lists are not generally obtained from third parties for marketing purposes
- In accordance with the anti-spam legislation, individuals to whom marketing communications are sent are:
 - Chosen on the basis of having given their express and/or implied consent for such communications to be sent to them
 - Always given an opt out or unsubscribe option in relation to such communications – please see complaints section

11. When We Collect Your Personal Information

- We check that it is reasonably necessary for our functions or activities as a recruitment consultancy firm. We check that it is current, complete and accurate. This will sometimes mean that we must cross check the information that we collect from you with third parties;
- We record and hold your information in our Information Record System.
- We retrieve your information when we need to use or disclose it for our functions and activities. At that time, we check that it is current, complete, accurate and relevant. This will sometimes mean that we must cross check the information that we collect from you with third parties once again – especially if some time has passed since we last checked.
- Subject to some exceptions, we permit you to access your personal information in accordance with APP: 12 of the (APPs).
- We correct or attach associated statements to your personal information in accordance with APP: 13 of the (APPs).
- 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.

12. How Your Personal Information Is Held

We hold personal information in a combination of secure computer storage facilities, paper-based files and other records at our secure premises and take a range of measures to protect your personal information from misuse, interference and loss; and unauthorised access, modification or disclosure.

Personal 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.

13. Information Security

Coceptive Consulting Group upholds strict policies, procedures and processes surrounding the collection, storage and security of information that we hold.

Our other staff policies that assist in protecting information include:

- IT Usage Policy; and
- Social Media Policy

14. Information Record System / CRM

Our information Record System (Vincere) is a recruitment CRM system produced by a company called Hiring Boss Holdings. Information is stored in electronic format on a server hosted by Hiring Boss Holdings. A copy of their 'Privacy Policy' can be located at <https://www.vincere.io/privacy>

15. 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 and to our related entities;
- To our clients;
- To referees for suitability and screening purposes;

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 solution providers;
- Internet service providers;
- Legal and other professional advisors; and
- Insurance brokers

16. Access

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

- Evaluative opinion material obtained confidentially by us when undertaking reference checks; and access that would impact on the privacy rights of other people.
- Evaluative opinion material obtained confidentially by us when sourcing feedback from involved parties.
- Evaluative opinion material created by us when assessing candidate suitability.

If you wish to obtain access to your personal information you should contact our office. You will need to be in a position to verify your identity.

You should also anticipate that it may take a little time to process your application for access as there may be a need to retrieve information from storage and review information in order to determine what information may be provided.

We may impose a moderate charge to cover the administration of processing the request (Please refer to our 'Terms of Business'. Any time delay or charge will be discussed with you at the time you request access to your personal information.

17. Correction/s

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 are reasonable in the circumstances to correct that 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.

18. Enquiries, Complaints & Unsubscribing

You can make enquiries, requests to access/delete or correct your information, or complain about alleged breaches of the APP's to our Legal Counsel:

Mr Ben Game – Solicitor
C/O: Marjason & Marjason Solicitors
P. O Box 598 Queanbeyan NSW 2620

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. If you are not satisfied with our response to your complaint you can contact the Australian Information Commissioner (OAIC).

Individuals have the option to unsubscribe from receiving marketing material at any time. If you would like to unsubscribe from receiving marketing material, please contact us or use the 'unsubscribe' link available in the marketing email.

19. Feedback

Coceptive Consulting Group has several areas on our website where you can submit feedback, under the 'contact us' section. Any feedback that is submitted through this area becomes the property of Coceptive Consulting Group. We may use this feedback, such as success stories or responses to surveys, for marketing purposes, or to contact you for further feedback on the site.

20. Definitions

Personal information means information or an opinion about you.

Sensitive information is a special category of personal information under the Privacy Act 1988. It is information or opinions about you, including membership of a professional or trade association or membership of a trade union; criminal record; health information, racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, and sexual preferences or practices. As outlined in the Privacy Act 1988, sensitive information can, in most cases, only be disclosed with your consent.

Cookies are small data files that may be placed on the hard drive of your computer when you visit www.coceptivegroup.com.au Cookies permit the Coceptive Consulting Group server to identify your browser whenever you interact with us.