

PRIVACY POLICY

Genovate Consulting offers executive and other recruitment services to help companies recruit new personnel (“Search Services”), as well as talent management, consulting, and other services (“Consulting Services”). We may collect information about you in connection with either or both of these services.

Genovate Consulting takes the security of your information seriously and wants you to be familiar with how we collect, use and disclose information about you. This Privacy Policy (the “Policy”) describes our privacy practices regarding the collection, use and worldwide transfer of personal information collected by Genovate Consulting in connection with our Search Services and Consulting Services (collectively, the “Services”), including information collected offline; our web sites, including but not limited to www.genovate.com.au and through the software applications made available by us for use on or through computers or mobile devices (the “Apps”); through our social media pages and apps to which the Site links (collectively, our “Social Media Pages”), as well as through HTML-formatted email messages that we send to you that link to this Privacy Policy (collectively, including the Site, Apps and our Social Media Page, the “Online Systems”).

By using the Online Systems, you signify your agreement with this Policy. If you do not agree to this Policy, do not use the Online Systems.

At Genovate Consulting Pty Ltd, we manage personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles*.

We only collect information that is reasonably necessary for the proper performance of our activities or functions.

We do not collect personal information just because we think it could be useful at some future stage if we have no present need for it.

We may decline to collect unsolicited personal information from or about you and take steps to purge it from our systems.

By following the links in this document, you will be able to find out how we manage your personal information as an APP Entity under the [Australian Privacy Principles \(APPs\)](#).

PERSONAL INFORMATION WE COLLECT.

For Candidates

Other than the everyday information such as your contact details, the type of information that we typically collect and hold about Candidates is information that is necessary to assess amenability to work offers and work availability; suitability for placements; or to manage the performance in work obtained through us and includes:

- Work history, skills and experience – typically supplied by you in the form of a resume or CV
- Nominated references and performance reviews – the opinions of others about your work performance, your work experience and qualifications
- Skills and aptitude test results – any test results supplied by you, a third party or for any test that you have undertaken specifically for Genovate Consulting
- Expectations – availability, preferences and expectations relating to potential work offers, e.g. salary expectations
- Sensitive information – this may be collected in regard to particular jobs you are offered or for which you are shortlisted, e.g. relevant medical history or criminal history
- In certain cases, we may request sensitive information in connection with our Services. For example, our assessments may include demographic survey questions that our clients may choose to use for their participants, such as questions about gender, race, age, or country of origin.
- In the course of our Services, we may collect personal information related to gender. As permitted by applicable laws, we may obtain background verification information.

If you submit any personal information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

For Clients

The type of information that we typically collect and hold about Clients is information that is necessary to help us manage the presentation and delivery of our services and includes:

- Contact details – name, position, telephone number(s), email address(es), postal address, etc
- Company details – industry, services provided, organisational structures, technologies used, etc
- Preferences and needs – typical skill-sets required, marketing material and event interests, etc

For Referees

The type of information that we typically collect and hold about Referees is information that is necessary to help to make determinations about the suitability of one of our Candidates for particular jobs or particular types of work and includes:

- Referee contact details – name, position, company, telephone number(s), email address(es), postal address, etc

- Confirmation of the following, the Candidates:
 - ✓ Employment and position
 - ✓ Performance
 - ✓ Work ethics
 - ✓ Interpersonal skills
 - ✓ Reason for leaving role

HOW WE USE THE INFORMATION WE COLLECT.

We use the information we collect in support of our Services. The following paragraphs describe some of the ways in which we may use personal and other information:

The purposes for which we collect, hold, use and disclose your personal information are likely to differ depending on whether you are:

- A Candidate
- A Client
- A Referee

The following section is also relevant to our use and disclosure of your personal information:

- Overseas Disclosures

A Candidate

Information that we collect, hold, use and disclose about candidates is typically used for:

Our assessment of the Candidate's suitability for registration with us

- The necessary validation (including from appropriate third party sources) of the Candidate's resume, nominated references, or stated qualifications, experience, training or abilities;
- The Candidate's actual or possible work placement(s);
- The Candidate's performance appraisals;
- Any test or assessment (including medical tests and assessments) that the Candidate might be required to undergo;
- Our assessment of the Candidate's ongoing performance and prospects;
- Any workplace rehabilitation in which the Candidate and we are involved;
- Our management of any complaint, investigation or inquiry in which you are involved;
- Any insurance claim or proposal that requires disclosure of the Candidate's personal or sensitive information;
- Any reference that we may give concerning the Candidate's work;
- Statistical purposes and statutory compliance obligations.

A Client

Personal information that we collect, hold, use and disclose about Clients is typically used for:

- Client and business relationship management;
- Recruitment functions;
- Marketing services to you;
- Statistical purposes and statutory compliance requirements.

A Referee

Personal information that we collect, hold, use and disclose about Referees is typically used for:

- Confirming the identity and authority to provide references;
- Candidate's suitability assessment;
- Recruitment functions.

Fulfilling your requests.

We may use personal information to respond to your inquiries and fulfill your requests. If you contact us, we may keep a record of your contact information and correspondence, and we may use any information you provide in your message to respond to your inquiry.

Business purposes.

We may use personal information for our business purposes, such as audits, internal communication regarding candidates and clients, determining the effectiveness of our promotional activities, administering our products and services, maintaining and securing our infrastructure, and for procurement and financial transactions.

Informational communications.

Genovate Consulting may from time to time send informational e-mails, articles, white papers, proposals, engagement letters, and other information regarding the Services. Occasionally, and with your consent, we may use your personal information in press releases and direct marketing materials. We also may use personal information such as e-mail or postal addresses to conduct surveys.

Administrative information.

We may from time to time use personal information to send you important information regarding the Online Systems, changes to our terms, conditions, and policies and/or other administrative information. We may also contact you from time to time to verify that the personal information we have collected about you is accurate and current.

Other activities.

In addition, we may use and disclose personal information in other ways to perform our Services, as described below:

- ✓ Additional activities for Search Services. In the course of our Search Services, we use personal information that we have collected concerning candidates to identify professional opportunities that we think may be of interest. We may contact potential candidates from time to time regarding such opportunities. We also may contact individuals from time to time to solicit names of, or other

personal information regarding, potential candidates in connection with a search that we are conducting and for purposes of market intelligence.

- ✓ We also use personal information to confirm references and conduct education and background checks, as appropriate. We may further use personal information that we collect for purposes of aggregating and disclosing diversity statistics and other statistical information regarding our candidates and placement activities.
- ✓ Additional activities for Consulting Services. In the course of our Consulting Services, we may use personal information collected about you through our assessments to render Services to our clients.
- ✓ Disclosure to service providers. Genovate Consulting works with third parties who provide services that may include, but are not necessarily limited to, assessment services, including assessment validation services; website hosting and IT consulting services; data analysis; resume verification; background checking; payroll services; public relations services; attorneys, accountants, and other administrative and back-up and security services. As part of providing those services, such third parties will be provided with access to personal information. In addition, our software development partners may use personal information for purposes of modifying, improving, refining and validating their technology and research and development.
- ✓ Other disclosures. Genovate Consulting may also use or disclose personal information in order to: (i) comply with applicable laws; (ii) respond to inquiries or requests from public or government authorities, including those outside of your country of residence; (iii) comply with valid legal process; (iv) protect the rights, privacy, safety or property of Genovate Consulting, users of the Online Systems or the public; (v) permit us to pursue available remedies or limit the damages that we may sustain; (vi) enforce our Terms of Use; or (vii) respond to an emergency. We cannot and do not assume any responsibility for the actions or omissions of third parties, such as clients, including the manner in which they use personal information received either from Genovate Consulting or from other independent sources.

Photos & Images

We will not request that you supply photographs, scan photo ID, or capture and retain video image data of you in cases where simply sighting photographs or proof of identity documents would be sufficient in the circumstances.

Electronic Transactions

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

- ✓ Ask to be on an email list such as a job notification list;
- ✓ Register as a site user to access facilities on our site such as a job notification board;
- ✓ Make a written online enquiry or email us through our website;
- ✓ Submit a resume by email or through our website;

It is important that you understand that there are risks associated with use of the Internet and you should take all appropriate steps to protect your personal information.

You can contact us by land-line telephone or post if you have concerns about making contact via the Internet.

Cookies

What are browser cookies and what do they do?

'A cookie (also tracking cookie, browser cookie, and HTTP cookie) is a small piece of text stored on a user's computer by a web browser.' – Wikipedia

We use "cookies" — that is, small text files placed on a visitor's computer hard drive — and other technologies to help us determine information such as the type of content to which a visitor to the Site links, and the length of time each visitor spends at any particular area of the Site.

You can configure your browser settings to automatically decline cookies, or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. (Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.) You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Online Systems. For example, we may not be able to recognize your computer and you may need to log in every time you visit the applicable Online Systems. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

Third Party Cookies & Tracking

Genovate Consulting uses Google Analytics to track website traffic and website usage for all our websites. Google Analytics cookies are used to store information, such as what time the current visit occurred, whether the visitor has been to the site before, and what site referred the visitor to the web page. This information is specific to the individual domains and websites within Genovate Consulting.

How Genovate Consulting Handles Cookies and Data on Our Website(s)

Cookies are an essential part of the workings of our website. Genovate Consulting's cookies are first-party cookies and are used only as part of the navigation and do not record any personal information of anyone using the website(s). Genovate Consulting's website cookies are used ONLY within our individual website(s). No data is automatically transferred between our domains except for services that reasonably require such data transference (i.e. Job searches). In such cases, we only pass the specific service data required for the proper functioning of the service. Genovate does not, for any reason, directly access the data provided from these cookies for any purpose(s) outside the reasonable functioning of the website(s) and/or services offered within the website(s).

Any personal detail(s) which you submit to us (name, address, phone and e-mail details, plus –and including- information volunteered by you) through the website are held by Genovate Consulting for its own use for the purposes of recruitment and/or related services/activities.

By submitting your Personal Data, you CONSENT to it being processed by Genovate to be used, within reason, for the prosecution of its business. We may use this data to make you aware of additional services that may be of interest to you, or any changes to the site. It is your responsibility to ensure that your Personal Data is accurate and up to date and to inform us of any changes that need to be made.

You have the opportunity to send us your CV online. We guarantee that this CV will not appear on the website but may be stored on our internal database to assist in finding you a job placement. We will make every effort to ensure your CV is kept secure. For the purposes of finding a wider range of opportunities for you, Genovate, may, at times, share your detail/information with our offices in other countries/region that Genovate Consulting operates within. For the purposes of the recruitment process, we may share your details/information with employers/3rd party companies/individuals. In these instances where your detail is shared outside Genovate Consulting, we will seek your approval prior to making your detail available.

How Your Personal Information Is Held

Personal information is held in our Information Record System 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.

We take a range of measures to protect your personal information from:

- Misuse, interference and loss; and
- Unauthorised access, modification or disclosure

Our Information Record System

Genovate Consulting uses a number of databases to store personal information, some of which are cloud-based. As such, personal information is accessible and may be held on portable devices such as mobile phones, laptop computers or in diaries operated and held by our employees.

Information Security

With the majority of the personal information we collect and hold being of an electronic format (soft-copy), Genovate Consulting has strict policies relating to systems access, ensuring that:

- Access to systems and related system permissions is granted based on the individual employee's role within the organisation; and
- Access to systems is immediately revoked on the termination of an employee.

As password protection is a key feature of information security, Genovate Consulting's password policy ensures that:

- Employees are forced to change their system passwords on a regular basis;
- Passwords are forced to be 'strong' passwords, e.g. a forced minimum number of characters, inability to use the same password within a set number of iterations, etc; and
- Computers and laptops within Genovate Consulting offices automatically lock after a short period of inactivity and cannot be unlocked without a valid password.

Personal or sensitive information contained in a hard-copy format is stored securely when not in use. When hard-copy documentation containing personal or sensitive information is no longer required, each Genovate Consulting office has a secure disposal unit in which to deposit the documentation for its ultimate destruction.

QUESTIONS.

Questions regarding this Policy should be directed to Genovate Consulting - info@genovate.com.au Attn: Privacy Coordinator.