

September 2023 – Version 10

### Privacy and Security Policy

This Privacy Policy applies to each Impellam Group company operating in Australia from time-to-time which may collect, hold and handle personal information about you, including:

- Comensura Pty Limited;
- Flexy Services Pty Limited;

each of which is located at Level 14, 309 Kent Street, Sydney NSW 2000 Australia (collectively referred to as the “Company”).

The purpose of this Privacy Policy is to provide a general overview about how the Company collects and handles personal information about you in accordance with the *Privacy Act 1988 (Cth)* including the Australian Privacy Principles (collectively referred to as the “Privacy Laws”) as the case may be.

For the purpose of this Privacy Policy, “we” and “us” refers to the Company. It applies to the personal information of our Candidates, Suppliers, Clients, website users and Employees (see below for further explanation of these terms).

Personal information is any personally identifiable information, such as your email address, name, home or work address, telephone number, bank details or tax numbers, which can directly or indirectly identify you. We refer to it as “personal information” here.

Other Company policies may apply instead of, or in addition to, this Privacy Policy in certain circumstances where we notify you.

#### 1 What information might we collect about you?

We will collect personal information about you during the course of your dealings with us. Generally we will only collect personal information that is necessary for our business functions. The type of personal information we collect will depend on your dealings with us. For example:

<b>Candidates</b>	<ul style="list-style-type: none"> <li>➤ personal and contact details (for example your name, email address, home address, telephone number, date of birth, gender);</li> <li>➤ personal and contact details you give us when subscribing to receive emails, newsletters or marketing information from us;</li> <li>➤ during pre-assignment vetting we will request details from you including, your name, your work history, qualifications, contact details (such as email, telephone number and home address), your right to work documents, details required for equality and discrimination legislation checks and your personal preferences, choices and requirements specific to particular requests or services;</li> <li>➤ details of your education, employment history, bank details and national insurance number, references, right to work and other information you tell us about yourself (e.g. the information contained within your CV) when you engage with us for the provision of services;</li> <li>➤ information from online sources for example social media activity (such as likes, shares, tweets, social media profiles such as LinkedIn profiles), recruitment websites and job boards;</li> <li>➤ additional information which you provide voluntarily and/or which we may ask from you to better understand you and your interests</li> </ul> <p>We may also collect sensitive information about you (including details of your physical or mental health, racial or ethnic origin, criminal history, trade union membership and/or other sensitive information that you may choose to provide to us voluntarily from time to time.</p> <p>Generally, we will only collect sensitive information with your consent. Unless you tell us otherwise, we will assume that you have consented to us collecting all sensitive information you provide to us, and to us handling that information in accordance with this Privacy Policy.</p>
<b>Suppliers</b>	<ul style="list-style-type: none"> <li>➤ contact details to enable the provision of your services to us and the fulfillment of our contract obligations, this may include names, email addresses and telephone numbers;</li> <li>➤ bank details and any other details required to enable payment for the services supplied.</li> </ul>
<b>Clients</b>	<ul style="list-style-type: none"> <li>➤ your contact details or those of individuals at your organisation (such as names, telephone numbers and email addresses) to enable the provision of services and to facilitate our relationship with you, including relevant marketing.</li> </ul>
<b>Prospective employees and contractors</b>	<ul style="list-style-type: none"> <li>➤ personal and contact details (for example your name, email address, date of birth, gender);</li> <li>➤ personal and contact details of your emergency contact and referees;</li> <li>➤ during pre-employment vetting we will request details from you including, your name, your work history, qualifications, contact details (such as email, telephone number and home address), your right to work documents, details required for equality and discrimination legislation checks and your personal preferences, choices and requirements specific to particular requests or services;</li> <li>➤ details of your education, employment history, bank details and national insurance number, references, right to work and other information you tell us about yourself (e.g. the information contained within your CV);</li> <li>➤ information from online sources for example social media activity (such as likes, shares, tweets, social media profiles such as LinkedIn profiles), recruitment websites and job boards;</li> </ul>

	<ul style="list-style-type: none"> <li>➤ additional information which you provide voluntarily and/or which we may ask from you to better understand you and your interests</li> </ul> <p>We may also collect sensitive information about you (including details of your physical or mental health, racial or ethnic origin, criminal history, trade union membership and/or other sensitive information that you may choose to provide to us voluntarily from time to time.</p> <p>Generally, we will only collect sensitive information with your consent. Unless you tell us otherwise, we will assume that you have consented to us collecting all sensitive information you provide to us, and to us handling that information in accordance with this Privacy Policy.</p>
<b>Referees and Emergency Contacts</b>	<ul style="list-style-type: none"> <li>➤ We require a referee's contact details (name, email address and telephone number) to enable us to confirm certain details provided by the Candidate or prospective employee, to facilitate the employment process.</li> <li>➤ Emergency contact information (a name, email address and telephone number) is required in case of an emergency where we would need to contact someone on your behalf.</li> </ul>

## 2 How do we collect, hold, use and disclose your personal information?

Generally, we collect your personal information directly from you, unless it is impracticable or unreasonable to do so. From time to time we may collect personal information about you from third parties (for example, from a candidate's referees) and from publicly available resources (for example, from social media and other online sources).

Where you provide us with personal information about a third party, you represent, and we collect it on the basis that, you have that person's consent for us to collect and handle their personal information in accordance with this Privacy Policy.

We generally use and disclose your personal information for the purposes for which we collected it and for other related purposes that you would reasonably expect, in other instances with your consent or as otherwise required or permitted by law (for example, with local tax authorities, immigration officials or for audit or other investigative purposes).

The uses and disclosures that we make will depend on your dealings with us. For example, we may exchange your personal information with other members of our corporate group, for the performance of our contracts with clients and suppliers for the purposes described above. Our suppliers may include our subcontractors who provide portions of our services to our clients or candidates on our behalf, suppliers of IT services, payroll services or vetting services and other third parties we engage in connection with our business operations ("Third Party Suppliers"). When we engage a Third Party Supplier to perform any such services for us, we take all reasonable measures to ensure the Third Party Supplier:

- recognises our obligations under the Privacy Laws;
- does not engage in conduct that can cause us to be in breach of the Privacy Laws; and
- agrees to protect your personal information as required, or to no lesser extent than is required, by the Privacy Laws.

If we are unable to collect the personal information we require, or the information provided is incorrect or incomplete, this may affect our ability to provide products or services to you.

Where your personal information is used or disclosed for marketing and promotional purposes, you can opt-out at any time free of charge by using the “unsubscribe” option included in any marketing e-mail or other marketing material received from us, or by contacting us at [optout@impellam.com](mailto:optout@impellam.com).

Below are some examples of how we collect, hold, use and disclose personal information in different situations.

<b>Candidates</b>	<p><b>How and when do we collect your personal information?</b></p> <p>We may collect your personal information when you apply for a role through us (or otherwise contact us from time to time) by:</p> <ul style="list-style-type: none"> <li>➤ you responding to an advert on a job board or other website;</li> <li>➤ by you directly contacting our business,</li> <li>➤ by you filling in an application form in a branch;</li> <li>➤ when you speak to one of our consultants by telephone; or</li> <li>➤ another agency or organisation passes your details to us.</li> </ul> <p><b>Why do we collect, hold, use and disclose your personal information?</b></p> <p>Examples of the purposes for which we may collect, hold, use and disclose your personal information in connection with the work-searching process and our related business functions, include:</p> <ul style="list-style-type: none"> <li>➤ responding to your queries;</li> <li>➤ providing work-finding services and/or information to you;</li> <li>➤ transmitting personal information between our offices or functions for internal administrative purposes;</li> <li>➤ providing you with marketing and promotional material;</li> <li>➤ submitting your details to our clients for prospective employment;</li> <li>➤ setting you up on a work assignment with a client;</li> <li>➤ completing on-boarding procedures where you have successfully obtained a work-assignment;</li> <li>➤ fulfilling our reporting obligations to clients;</li> <li>➤ undertaking management of timesheets, payroll and work performance; and/or</li> <li>➤ internal disclosure as part of our pre-assignment vetting.</li> </ul>
<b>Prospective employees and contractors</b>	<p><b>How and when do we collect your personal information?</b></p> <p>We collect your personal information when you come to work with us from:</p> <ul style="list-style-type: none"> <li>➤ your application to us; and</li> <li>➤ the information you provide when you complete the necessary forms required by our Human Resources team.</li> </ul> <p><b>Why do we collect, hold, use and disclose your personal information?</b></p> <p>We collect, hold, use and disclose your personal information because it is necessary for the pre-employment or pre-engagement vetting processing and for any subsequent employment or engagement by us.</p>
<b>Suppliers &amp; Clients</b>	<p><b>How and when do we collect your personal information?</b></p> <p>We may collect your personal information about you or (if an organisation) your contact personnel when required in the course of our business relationship with you.</p> <p><b>Why do we collect, hold, use and disclose your personal information?</b></p>

	<p>We collect, hold, use and disclose your personal information because it is necessary to obtain certain details from you:</p> <ul style="list-style-type: none"><li>➤ to offer services to you or to obtain support and services from you;</li><li>➤ to perform certain legal obligations;</li><li>➤ in the performance of our contract with you;</li><li>➤ to help us to target appropriate marketing campaigns;</li><li>➤ in transmitting personal information between our offices or functions for internal administrative purposes; and/or</li><li>➤ providing marketing and promotional material.</li></ul>
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### 3. Website

Each of our websites uses cookies. The cookies are used for statistical purposes and to assist with your use of the website. We may also collect click-stream data when you use the website, such as the date and time of your visit, the pages you accessed, your IP address, the type of browser and operating system you are using and the websites you come from and move to. This information is collected for statistical purposes to assist us to find out how our website is used and navigated and to improve our website (find out more about cookies and how we use them in our [Cookie Policy](#)).

We may also collect information which you provide to us voluntarily, such as from your interaction with us on social media (for example likes, shares and tweets), and information you provide if you report a problem with our website or service.

### 4. International transfers of your personal information

We may transfer your personal information to members of our corporate group and to other third parties described above (such as our Third Party Suppliers) located within and outside of Australia as the case may be.

Some of these recipients are located in the United Kingdom, Ireland, United States of America, Singapore and countries in the European Economic Area.

Please contact us for further information on any obligations imposed by us on those third parties in connection with such international transfers of personal information.

### 5 Security and retention

Generally we take reasonable steps to employ appropriate security measures to help protect your personal information and guard against unauthorised access, modification and disclosure, and from other types of misuse, interference or loss. However the transmission of information via the Internet is inherently insecure so we cannot guarantee the security of your information when it is transmitted to our website or from third party websites such as job boards.

Generally we will take reasonable steps to destroy or de-identify your personal information when we no longer require it for any purpose for which it can be lawfully used or disclosed by us. For example, personal information may be retained for the primary purpose for which the personal information was collected and for related secondary purposes, as well as for insurance and corporate governance purposes, record retention and back-up purposes, to resolve disputes and to comply with any applicable law.

### 6. Access and correction of your personal information

You may lodge a request to correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading. You may also request that we provide you with access to

the personal information we hold about you. Generally, we will provide you with access, except in limited circumstances where the law permits us to deny access.

Any correction or access requests must be made in writing to our Data Protection Officer via the details shown below. No fee will be incurred for requesting correction or access. If your access request is accepted, we will inform you if any fee will be payable for providing access.

### 7. Updates to this Privacy Notice

This Privacy Notice may be updated periodically to reflect changes in our privacy practices and legal updates. We will indicate at the bottom of the notice, which is posted on our websites, when it was most recently updated. You should review our Privacy Notice each time you visit our website or provide us with personal information.

### 8. Complaints

If you have a complaint about the way in which we handle your personal information please contact us via the details below. We will confirm receipt of your complaint and set out the time frame we require to investigate your complaint and provide you with a response which, generally, will be within 14 days of receiving your complaint.

### 9. Contact Us

If you have any questions in relation to this Privacy Policy, or if you would like to contact us to exercise your rights as stated in this Privacy Policy, you may contact us at: [GDPR@impellam.com](mailto:GDPR@impellam.com) or write to:

The Data Protection Officer  
Group Legal  
Impellam Group plc  
800 The Boulevard  
Capability Green  
Luton  
Beds  
LU1 3BA  
United Kingdom