

# APP Organization Privacy Policy

## 1. Introduction

We manage personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles*.

You can request a copy of our full policy, or just read the parts that interest. 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.

We manage personal information according to our usual information flow. There may sometimes be departures from our usual information flow.

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

You will also be able to find out about the information flows associated with that information.

### 1.1. APP Entity

Synergy Placement Pty Ltd manages personal information, as an APP Entity, under the Australian Privacy Principles (APPs).

Because we may sometimes work as a contracted service provider to a range of Commonwealth, State and Territory government agencies, it might become necessary for us to collect and manage personal information as an Agency under different privacy arrangements.

If you wish to know whether this applies to you, please contact us at <https://synergyplacements.com.au/contact/>

### 1.2. Information Flow

When we collect your personal information:

- we check that it is reasonably necessary for our **functions or** as a provider of contingent labour services, employment agency and on-hire firm;
- Synergy Placements collects information for employment, recruitment and labour hire purposes. This includes the general purpose of finding you suitable employment

opportunities with our clients and prospective employers;

- Your identity and personal details may be provided to clients and prospective employers once a suitable position has been identified or a client or potential employer wish to contact you;
- we check that it is current, complete and accurate. This will sometimes mean that we have to cross check the information that we collect from you with third parties;
- we record and hold your information in our Information Record
- we retrieve your information when we need to use or disclose it for our use in searching for appropriate employment opportunities on your behalf. 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 and conditions, we permit you to access your personal information in accordance with APP:12 .
- we **correct or attach associated statements** to your personal information in accordance with APP:13.
- we destroy or de-identify your personal information when it is no longer needed in our efforts to find appropriate employment opportunities for you or to support you as an employee of Synergy Placements. We do not destroy or de-identify information that is contained in a Commonwealth Record or personal information we are required by law to retain.

## 2. Kinds of information that we collect and hold

Personal information that we collect and hold is information that is reasonably necessary for the proper performance of our **functions and activities** as a labour hire and recruitment agency and is likely to differ depending on whether you are:

- a **Workseeker**
- a **Client**
- a **Referee**

### 2.1. Workseekers

A Workseeker is an individual who has registered with, been referred to, or engaged with Synergy Placements for the purpose of finding employment or work opportunities. Workseekers may include candidates who apply for roles directly or through third party platforms, are placed on assignments, attend site inductions, or are considered for current or future vacancies.

The type of information that we typically collect and hold about Workseekers 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:

- personal and contact details, including name, address, date of birth, phone number, email address, and emergency contact details;
- details of your work history, qualifications, skills, training, licences, tickets, and certifications relevant to employment;
- information relating to work availability, preferred roles, locations, hours, pay expectations, and employment type preferences;
- identity information, right-to-work documentation, and visa or work entitlement details (where applicable);
- results of interviews, assessments, reference checks, background checks, and verification processes conducted by us or on our behalf;
- health, fitness, or capacity-to-work information where required for lawful placement, workplace safety, or role suitability (and only to the extent permitted by law);
- performance-related information, including attendance, reliability, conduct, feedback, and disciplinary matters arising from placements;
- payroll and administrative information, such as tax file number, superannuation details, bank account details, and timesheet records;
- workplace health and safety records, including incident or injury reports where relevant; and
- records of communications between you and us, including applications, emails, phone calls, messages, and feedback.

## **2.2. For Clients**

A Client is a business or organisation that engages, has engaged, or has entered into discussions or correspondence with Synergy Placements regarding recruitment, labour hire, workforce management, or related services.

This includes businesses that have made enquiries, held discussions, requested information, quotes, or proposals, or otherwise engaged in conversations with Synergy Placements about labour hire or recruitment services, regardless of whether a placement was ultimately made.

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:

- details of your organisation, business structure, key contacts, and authorised representatives;
- information about roles to be filled, including position descriptions, required qualifications, skills, experience, reporting lines, hours of work, pay rates, and workplace conditions;
- information about your workplace, site locations, safety requirements, induction procedures, policies, and compliance obligations;
- details relating to workforce preferences, including team structure, communication style, cultural fit, and performance expectations;

- operational information required to manage placements, such as rostering requirements, timesheet approval processes, invoicing details, and payroll-related instructions;
- business, social, or professional interests where relevant to our working relationship and service delivery;
- records of communications between us, including emails, phone calls, meetings, and feedback; and
- any additional information you choose to provide to assist us in delivering labour hire and recruitment services, such as milestone dates, preferred methods of contact, or social media channels.

### 2.3. 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 Workseekers for particular jobs or particular types of work and includes:

- your name and position or professional title;
- your relationship with the Workseeker, including the nature and duration of that relationship;
- your knowledge of, and opinions about, the Workseeker's skills, experience, performance, conduct, reliability, and suitability for specific roles or work environments;
- contextual or background information relevant to the reference being sought;
- your contact details for follow-up or clarification, where required; and
- confirmation of your identity and authority to provide a reference, where reasonably necessary.

## 3. Purposes

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

- a **Workseeker**
- a **Client**
- a **Referee**

The following sections are also relevant to our use and disclosure of your personal information:

- **Our Policy on Direct Marketing**

### 3.1. For Workseekers

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

- work placement operations, including assessing suitability, availability, and matching Workseekers to appropriate roles and clients;

- recruitment functions, including candidate sourcing, screening, interviewing, shortlisting, reference checking, and placement;
- managing employment or engagement relationships, including onboarding, rostering, payroll, performance management, disciplinary processes, and offboarding;
- verifying identity, qualifications, licences, work rights, and other information required to lawfully place or employ Workseekers;
- meeting workplace health and safety obligations, including managing risk, incidents, injuries, and return-to-work processes;
- compliance with legal, regulatory, industrial, and statutory obligations, including Fair Work, superannuation, taxation, WorkCover, and record-keeping requirements;
- responding to client enquiries and fulfilling contractual obligations to clients;
- statistical, analytical, reporting, and business improvement purposes (using de-identified information where practicable); and
- any other purpose reasonably related to our provision of labour hire and recruitment services, or as otherwise required or permitted by law.

### **3.2. For Clients**

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

- managing client and business relationships, including service delivery, account management, communication, and support;
- recruitment and labour hire functions, including understanding workforce requirements, presenting candidates, managing placements, and fulfilling contractual obligations;
- workplace health and safety purposes, including conducting site visits, workplace assessments, risk identification, audits, incident management, and ensuring compliance with WHS obligations;
- marketing and business development activities, including providing updates about our services, industry insights, and relevant opportunities (where permitted by law and in accordance with your preferences);
- operational and administrative purposes, including invoicing, billing, credit management, and record keeping;
- statistical, analytical, reporting, and business improvement purposes (using de-identified information where practicable);
- meeting legal, regulatory, and statutory compliance obligations; and
- any other purpose reasonably related to our provision of labour hire and recruitment services, or as otherwise required or permitted by law.

### **3.3. For Referees**

A Referee is an individual who provides, or is asked to provide, a professional reference about a Workseeker.

Referees may include current or former employers, supervisors, managers, or other persons capable of commenting on a Workseeker's employment history, performance, conduct, skills, licences, or suitability for work, including safety and site-based roles.

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

- confirm identity and authority to provide references;
- assess the suitability and fitness of Workseekers for particular roles or types of work;

- support recruitment and labour hire functions, including candidate evaluation and placement decisions; and
- meet legal, regulatory, and statutory compliance obligations, where applicable.

### **3.4. Our Policy on Direct Marketing**

We may use your personal information to directly market our services to clients and potential clients, and candidates and potential candidates. We use your personal information for direct marketing employment opportunities that may be suitable for you via mobile phone call, email and SMS. These direct marketing activities may include details of an employment opportunity that matches your skillset, career goals, or geographic location.

We may also send an anonymised version of your skillset to clients as part of a 'reverse marketing' campaign designed to find suitable work for our candidates.

We do not send your personal information to third parties for marketing purposes.

We do not obtain customer lists from third parties.

You may choose not to consent to direct marketing from us simply indicating your preferences when you complete the electronic OnBoarded information gathering process.

We aim to observe the requirements of anti-spam legislation and would provide an effective means for unsubscribing from any marketing that would be considered to be spam.

## **4. How your personal information is collected**

The means by which we will generally collect your personal information are likely to differ depending on whether you are:

- a **Workseeker**
- a **Client**
- a **Referee**

We sometimes collect information from third parties and publicly available sources when it is necessary for a specific purpose such as checking information that you have given us or where you have consented or would reasonably expect us to collect your personal information in this way.

Sometimes the technology that is used to support communications between us will provide personal information to us

### **4.1. For Workseekers**

Personal information 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 is also collected when:

- You complete a phone screening or suitability check
- You call, email, SMS or otherwise engage in conversation with Synergy Placements regarding employment or payroll matters
- You respond to the AI chatbot

We may also collect personal information about you 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.

### **Photos & Images**

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

## **4.2. For Clients**

Personal information about you may be collected:

- when you provide it to us for business or business related social purposes;

We may also collect personal information about you 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.

## **4.3. For Referees**

Personal information about you may be collected when you provide it to us:

- in the course of our checking Workseeker references with you and when we are checking information that we obtain from you about Workseekers;

We may also collect personal information about you 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.

## **4.4. 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 or SMS list such as a job notification list;
- register as a site user to access facilities on our site such as our online timesheet system, and safety induction training;
- make a written online enquiry or email us through our website;
- submit a resume by email or through our website;
- use web-based application and placement management apps to submit identification documents, receive job offers, undertake inductions, or upload time sheets etc;

Web-based applications that we frequently use include:

### **TiMaven**

Synergy Placements uses TiMaven as a timesheet management application. TiMaven processes timesheets where an Employee has worked and allows Employers to verify the hours. Synergy Placements uses this information to calculate and process an Employees pay. TiMaven collects personal information such as:

- First Name
- Last Name
- DOB
- Email
- Address (Street, Suburb, State, Postcode)
- Emergency Contact
- IP Address
- Tax
- Superannuation
- Bank Account

### **Other Platforms / Third Party Vendors**

Synergy Placements uses multiple other platforms / third party vendors.

APositive is a financing and lending company used to provide funding services. Personal information may be disclosed to APositive where required for funding, invoicing, or related financial arrangements.

View [APositive's Privacy Policy](#).

WorkCover is the government workers' compensation insurer used to insure workers who are injured in workplace accidents. Personal information may be disclosed for workers' compensation claims, injury management, and statutory compliance.

View [WorkCover Queensland Privacy Policy](#).

CloudPayroll is a payroll software used to calculate wages, manage payroll processing, and store payroll-related information. Personal information may include payment details, employment information, and statutory reporting data.

View [CloudPayroll's Privacy Policy](#).

JobAdder is a customer relationship management (CRM) and recruitment platform used to store, manage, and search Workseeker and Client information, job vacancies, and placement records.

View [JobAdder Privacy Policy](#).

Xero is an accounting software used for invoicing, financial reporting, reconciliation, and business record-keeping. Personal information may include billing details and transaction records.

View [Xero Privacy Policy](#).

Onboarded is a software used to collect and manage Workseeker information, including employment history, qualifications, licences, and, where required, medical and compliance-related information.

View [Onboarded Privacy Policy](#).

SmartAI is a software used to collect and manage Workseeker information, including employment background, licences, availability, and interest in work opportunities.

View [smartAI Privacy Policy](#).

RevMax is an organisation Synergy Placements works with to supply information to third parties in relation to government or industry wage subsidy programs. Personal information is

**only provided to RevMax where the individual has given explicit consent**, including by signing a release of information or authority form.

View [Revmax Privacy Policy](#).

Secured Signing is a secure, cloud-based platform for digital signatures and remote online notarization, enabling legally binding document signing from any device, anywhere.

View [Secured Signing Privacy Policy](#).

Twilio simplifies the complexity of the global telecommunications network and brings communications to the cloud.

View [Twilio Privacy Policy](#).

## **Cookies**

Cookies are small data files transferred onto computers or devices by websites used for a range of purposes such as record-keeping purposes, improving your website user experience, and authentication purposes.

Most browsers allow you to choose whether to accept cookies or not. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies before accessing the Synergy Placements website. Please note however, that some data may still be collected separately by tools such as Google Analytics, even though you may have set your browser preferences to reject all cookies.

TiMaven uses cookie-based authentication which is a method used by websites and web applications to authenticate users. When a user logs in, a cookie containing a unique identifier is created and stored on the user's device. This cookie is then sent back to the server with each subsequent request, allowing the server to recognize the user and grant access to protected resources.

## **Google reCAPTCHA**

Synergy Placements uses Google reCAPTCHA (version 2) as a means to eliminate spam attacks and to be able to distinguish users from bots. The tool may collect data about how you interact with the website, including:

- mouse movements
- device IP address
- date and time when pages were accessed
- device type, operating system and browser information
- device screen size
- geographic location (city)

View Google's [Cloud Data Processing Addendum](#).

## **Job Applications**

Synergy Placements collects your personal information when you provide it via a job application including, where relevant, your:

- name
- address
- contact details

- application documentation, including identification information

This personal information will ordinarily be used to assess your job application.

### **Primary Purpose Uses**

Synergy Placements usually uses your personal information for the purpose for which it was collected.

This ordinarily includes to:

- exercise its powers or perform its functions and duties
- carry out analytics, business improvement and reporting
- process job applications
- process pays

### **Social Networking Services**

Synergy Placements uses Twitter, Facebook, Instagram, YouTube and LinkedIn to communicate with the public about its work. When you communicate with Synergy Placements using these services, Synergy Placements collects the personal information you provide to it by engaging in that communication.

[Twitter](#), [Facebook](#), [Instagram](#), [YouTube](#) and [LinkedIn](#) each have their own privacy policies.

### **Collection of Your Personal Information**

Synergy Placements aims to only collect the personal or sensitive information it requires to carry out its powers, functions, and duties in any given instance.

The main way Synergy Placements collects personal information about you is when you provide it. For example, Synergy Placements personal information such as contact details, when you make a job vacancy application:

- contact Synergy Placements to ask for information
- apply for a job vacancy
- report a matter for investigation

Synergy Placements may also collect your contact details and other personal information, where relevant, if you are participating in a meeting or in consultation with it.

### **Indirect Collection**

Synergy Placements may collect personal information about you, including sensitive information, indirectly from publicly available sources or from third parties such as:

- your authorised representative, if you have one
- applicants, complainants, respondents to a complaint, investigation, application or data breach notification or the third parties' employees and witnesses
- other government agencies, including State or Territory authorities, and alternative complaint bodies, where information sharing is permitted.

Synergy Placements would ordinarily collect your personal information in this way to, for example:

- handle a complaint, data breach notification, review or investigation

- contact stakeholders who may be interested in the work of Synergy Placements or participating in Synergy Placements consultations.

### **Anonymity**

Individuals have the option, to interact with the Synergy Placements anonymously or using a pseudonym where reasonably possible. For example, if you contact the Synergy Placements enquiries line with a general question, you will not be asked for your name unless it is required to adequately handle your enquiry.

However, for most of your interactions with the Synergy Placements your name, contact information and enough information about the particular matter will be required to enable Synergy Placements to deal with the matter fairly and efficiently.

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. It might help you to look at the OAIC's resource on [Social media and online privacy | OAIC](#)

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

## **5. How your personal information is held**

Synergy Placements securely stores your personal information in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify personal information. However, some records such as employment records and tax records will be retained for the minimum government mandated timespans.

### **5.1. Data Breach Notifications & Response**

In the event of a data breach, we would respond by measures appropriate to the nature and seriousness of the breach and the size and resources of our organisation taken in accordance with the [four steps](#) set out in the OAIC's data breach notification guidance and advice.

## **6. Disclosures**

We may disclose your personal information to prospective host employers for the purpose of finding you suitable employment, or for a lawful related purpose such as marketing your skillset and availability, registering you for medical examinations, fit for work assessments and drug and alcohol testing.

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.
- to our contracted service providers, insurers, professional advisors and others with a proper interest in receiving your personal information for a lawful related purpose.

## 6.1. Related Purpose Disclosures

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 solutions providers;
- I.T. contractors, database designers and Internet service suppliers;
- Legal and other professional advisors;
- Insurance brokers, loss assessors and underwriters;
- Superannuation fund managers;
- Background checking and screening agents;
- Medical professionals for fit for work assessments, return to work evaluations, and drug and alcohol testing;

We take reasonable steps to ensure that terms of service with our CSPs recognise that we are bound by obligations to protect the privacy of your personal information and that they will not do anything that would cause us to breach those obligations.

## 6.2. Overseas Recipients

Some of your personal information is likely to be disclosed to overseas recipients.

The likely countries, type of information disclosed, and recipients are indicated, so far as is practicable, in the following table:

Country	Type of Information	Likely Recipients
The Philippines	All personal data stored in Synergy Placements corporate cloud based applications.	Resourcers, payroll clerks and admin assistants employed either directly by Synergy Placements or via a provider of employment services in the Philippines.

We cannot guarantee that any recipient of your personal information will protect it to the standard to which it ought to be protected. The costs and difficulties of enforcement of privacy rights in foreign jurisdictions and the impracticability of attempting to enforce such rights in some jurisdictions will mean that in some instances, we will need to seek your consent to disclosure.

## 7. Access & Correction

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

Important exceptions include:

- Evaluative opinion material obtained confidentially in the course of our performing reference checks; and access that would impact on the privacy rights of other people.

In many cases evaluative material contained in references that we obtain will be collected under obligations of confidentiality that the person who gave us that information is entitled to expect will be observed. We do refuse access if it would breach confidentiality.

For more information about access to your information see our **Access Policy**

For more information about applying to correct your information see our **Correction Policy**

## 7.1. Access Policy

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

Consistently with [guidance and advice](#) provided by the OAIC, we may impose a charge (provided it is not excessive) for retrieving and providing access to your personal information. Any such charge would be calculated having regard to:

- our staff costs in searching for, locating and retrieving the requested personal information, and deciding which personal information to provide to you;
- our staff costs in reproducing and sending the personal information;
- the costs of postage or materials involved in giving access
- the costs associated with using an intermediary – e.g., where access might be granted indirectly or to paraphrased information.

In determining the amount to charge, we would consider:

- our relationship with you;
- any known financial hardship factors;
- any known adverse consequences for you if you do not get access to the personal information.

We will aim to respond to all requests for access to personal information in a timely manner.

## 7.2. Correction Policy

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.

You can also find out information about our Data Breach Response and Notification Procedures.

We will aim to respond to any requests for correction within a period of 30 days. If a correction request is refused, you may escalate the request to our Privacy Co-ordinator, whose contact details are M: 0475 236 770. You can also make complaints to the Office of the Australian Information Commissioner through the Commission's website and the means set out there.

## 8. Complaints

You have a right to complain about our handling of your personal information if you believe that we have interfered with your privacy.

For more information see our **Complaints Procedure**.

### 8.1. Complaints procedure

If you are making a complaint about our handling of your personal information, it should first be made to us in writing.

You can make complaints about our handling of your personal information to our Privacy Co-ordinator, whose contact details are *Ph: 07 3122 6244*.

You can also make complaints to the [Office of the Australian Information Commissioner](#) through the Commission's website and the means set out there.

Complaints may also be made to [RCSA](#) the industry association of which we are a member.

RCSA administers a [Code of Conduct](#) for the professional and ethical conduct of its members.

The RCSA Code is supported by rules for the resolution of disputes involving members.

NOTE: The RCSA Code and grievance intervention rules do NOT constitute a recognised external dispute resolution scheme for the purposes of the APPs; but are primarily designed to ensure the good professional conduct of the Association's members.

When we receive your complaint:

- We will take steps to confirm the authenticity of the complaint and the contact details provided to us to ensure that we are responding to you or to a person whom you have authorised to receive information about your complaint;
- Upon confirmation we will write to you to acknowledge receipt and to confirm that we are handling your complaint in accordance with our policy.
- We may ask for clarification of certain aspects of the complaint and for further detail;
- We will consider the complaint and may make inquiries of people who can assist us to establish what has happened and why;

- We will require a reasonable time (usually 30 days) to respond;
- If the complaint can be resolved by procedures for **access and correction** we will suggest these to you as possible solutions;
- If we believe that your complaint may be capable of some other solution we will suggest that solution to you, on a confidential and without prejudice basis in our response;

If the complaint cannot be resolved by means that we propose in our response, we will suggest that you take your complaint to any recognised external dispute resolution scheme to which we belong or to the Office of the Australian Information Commissioner.