

Schrole Group Ltd Privacy Policy

It is the policy of Schrole Group Ltd (“Schrole”) to respect the confidentiality of information and the privacy of individuals. Schrole complies with the Australian Privacy Principles contained in the Privacy Act 1988 (as amended) in Australia.

This policy explains how we collect personal information, the treatment of personal information that we collect when you are on our websites, when you use our services, and use and disclosure of that information. This policy also applies to Schrole’s treatment of any personal information that our trusted third party partners share with us.

Personal Information Collection

It is Schrole’s usual practice to collect this personal information directly from you through the use of Schrole’s websites or in response to Schrole’s printed and online advertisements. Schrole websites include: schrole.com; schrolecover.com; schrolegroup.com; schroleconnect.com and etasgroup.edu.au. If you leave a Schrole website to a third party site any information collected by the third party is covered by their Privacy Policy.

Express Consent

You acknowledge that if you submit an application or contract our services, your application or request for services will constitute your express consent to our use of your personal information in accordance with our Privacy Policy as amended from time to time.

Information Types

Personal information that we collect and hold is information that is reasonably necessary for the proper performance of our services and technology platforms. The information collected will differ depending on whether you are:

In the case of Schrole Cover:

- An Organisation (employer)
- A Staff member of Cover/Relief staff

For Organisations:

The type of information that we typically collect and hold about Clients is information that is necessary to help us manage the delivery of our services and support the function of our technology platforms. This includes:

- Organisational information;
- Organisational contact information

For Staff members and Cover/Relief staff:

The type of information that we typically collect and hold about Staff members and Cover/Relief staff is information that is necessary to allow Organisations to determine their job skills and suitability. This includes:

- Contact details;
- Other documents uploaded at the Cover/Relief staff members choice.

In the case of Schrole Connect:

- a Client or Client Organisation;
- a Candidate/Student; or
- a Referee.

For Clients or Client Organisations

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

- Organisational information;
- Organisational contact information; and
- Billing and invoicing details.

For Candidates

The type of information that we typically collect and hold about Candidates is information that is necessary for Schrole Clients to assess Candidates suitability for placements by our Clients or Client Organisations and includes:

- Contact details;
- Training details and training history;
- Work history and relevant personal details; and
- Employment preferences.

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 a Candidates by a Client and includes:

- Contact details and work history;
- Record of comments provided; and
- Rankings of Candidates by Referees.

Sensitive Information

Sensitive information is a special category of personal information under the Australian Privacy Act. Given the nature of our business Schrole may collect sensitive information from time to time. However, Schrole does not actively seek to collect sensitive information unless it is necessary for our business purposes.

Sensitive Information is information or opinion about you, including but not limited to:

- 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; or
- philosophical beliefs, or sexual preferences or practices.

As outlined in the Australian Privacy Act sensitive information can, in most cases, only be disclosed with your consent. If we do have to collect sensitive information, we will do so in accordance with Australian Privacy Principles.

Collection

Your personal and sensitive information may be collected by Schrole for its own use and for the benefit of other members of Schrole Group Ltd, who might require access to your personal and sensitive information:

- when you complete any application forms or provide any other information in connection with the services you utilise with Schrole;
- via any of your references;
- as a result of inquiries that we might make of a professional association or registration body;
- as a result of any complaint or other information from or about you;
- via any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you were involved; or
- when you provide us with any additional information about you or your organisation. Schrole may collect personal information when you visit or use our websites. We may also receive personal information from trusted third parties.

Photos & Images

We may ask to see scanned photographic ID, including a passport or other relevant documentation where we need to verify your identity, work rights or qualifications.

Use of Information

Schrole may use personal and sensitive information collected depending on whether you are:

- a Client or Client Organisation of Schrole Connect, or an Organisation of Schrole Cover;
- a Candidate of Schrole Connect, or a Staff/Cover/Relief user of Schrole Cover; or
- a Referee of Schrole Connect.

For Clients and Client Organisations of Schrole Connect and Organisations of Schrole Cover Organisation and personal information that we collect, hold, use and disclose about Clients is typically used for:

- client and business relationship management;
- supporting the Schrole services we deliver to you;
- marketing services to you;
- in support of the function of our technology platforms; or
- statistical purposes and statutory compliance requirements.

For Candidates and Students of Schrole Connect, and Staff/Cover/Relief users of Schrole Cover Information that we collect, hold, use and disclose about Candidates or Students is typically used for:

- supporting the Schrole services we deliver to you;
- marketing services to you;
- in support of the function of our technology platforms; or
- statistical purposes and statutory compliance requirements.

For Referees

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

- to confirm identity and authority to provide references;
- Candidates suitability assessment;
- in support of the function of our technology platforms; or

- statistical purposes and statutory compliance requirements.

Direct Marketing

We may use information you provide us to contact you about our services that we believe may be of benefit to you.

We will never share your information with any third parties for marketing purposes.

We comply with the requirements of the anti-spam legislation and will not send you marketing emails without your consent.

How Personal Information is Stored

Personal information is held in our technology platforms until the time it is no longer needed for any purpose for which it may be used or disclosed. At this point it will be anonymised 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.

Information Security

We adopt a number of procedures to protect the information that we hold from unauthorised access, including but not limited to:

- Staff training;
- Password protection policy for all Schrole information technology services;
- Restricting access to information on a “need to know” basis;
- Policies and procedures to secure information on Schrole infrastructure including mobile devices such as laptops and smart phones; and
- Culling procedures including data deletion/data anonymising, physical shredding and secure document disposal.

Information Security Data Storage

All Schrole’s privacy data related to the technology services offered is stored either on premise at 142 Hasler Road, Osborne Park, WA 6017, Australia or within the cloud service providers Schrole engage.

Schrole’s cloud service providers comply with the Australian Government’s Protective Security Policy Framework where it relies on the Australian Government ISM standard.

In addition, the Cloud Services Providers comply with a number of industry standards such as ISO 27001 (for Information Security Management Systems, or ISMS), ISO27017 (for implementation of information security controls based on ISO/IEC 27002 for cloud services), ISO 27018 (for personally identifiable data) and Cloud Security Alliance (CSA) Cloud Controls Matrix 3.0.1 (for security and operational risk management controls).

Disclosure

Your personal and sensitive information may be disclosed to employees, clients and licensees of Schrole and trusted third parties include those in Australia, New Zealand, European Union, the United Kingdom and the United States of America (and any other countries where Schrole may provide its services in the future) regarding possible work placements or to assist us in providing our services to you, professional associations or registration body that have a legitimate interest in the disclosure of your personal and sensitive information and any person with a lawful entitlement to obtain the information.

We will also send information about you to other companies or people when we:

- have your consent to share the information;
- need to share your information to provide the product or service you have requested;

- need to send the information to companies who work on behalf of Schrole to provide a product or service to you (unless we tell you differently, these companies do not have any right to use the personal information we provide to them beyond what is necessary to assist us);
- respond to subpoenas, court orders or legal process; or
- find that your actions on our web sites violate the above terms of service, or any of our usage guidelines for specific products or services.

Failure to Provide Personal and Sensitive Information

If you do not give us the information we seek we may be limited in our ability to assist you.

Correction

Schrole may take such steps to make appropriate corrections, deletions and additions, in the circumstances that are reasonable to ensure that personal information is accurate, up to date and not misleading.

If you have created a profile with Schrole via our websites, you are able to review and edit your personal information at any time by logging into your account and reviewing your profile. You can delete your personal information or close your account by via the prompts on our website. If you do choose to close your account with Schrole, we may retain personal information from your account as and where required by law.

Access Policy

If you wish to obtain access to your personal information you should contact our Privacy Officer on +61 89230 7000 between the hours of 7:30am to 4:00pm in Western Australian Standard Time (UTC+8) or by emailing privacy@schrole.com. You will need to be in a position to verify your identity.

Questions and Complaints

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

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 Officer by email to privacy@schrole.com or by post to Schrole Group, 142 Hasler Road, Osborne Park, Perth WA 6017, Australia

You can also make complaints to the Office of the Australian Information Commissioner (see <http://www.oaic.gov.au/privacy/privacy-complaints>).

Privacy Policy Update

Schrole's privacy policy will be reviewed and updated from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment.

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 privacy policy.