Privacy - Australian clients

The protection of our clients' data is of great importance to us. Accordingly, we host our clients' data within the highly restricted data facilities of organisations certified under the international standard for Information Security Management Systems, ISO 27001.

Through our ASP Agreements with our clients, we are contractually bound to keep data confidential. We take this issue seriously and have put in place rigorous systems for protecting data.

Via our Application, we often hold 'personal information'ⁱ on behalf of our clients. Under our ASP Agreements, we agree to comply with the Privacy Act 1988 (Cth) in respect of all such data.

While we hold personal information on behalf of our clients, as the collectors and 'owners' of the information (and the ones with the relationship with candidates) our clients need to handle and manage that data in accordance with their:

- Privacy Policy; and
- Privacy Statement; and
- the relevant Privacy Principles.

It is the responsibility of our clients to draft and maintain their Privacy Policy and Privacy Statement.

For reference:

Privacy Principles

National Privacy Principles (NPPs): <u>http://www.oaic.gov.au/privacy/privacy-resources/privacy-fact-sheets/other/privacy-fact-sheet-2-national-privacy-principles</u>

Information Privacy Principles (IPPs): <u>http://www.oaic.gov.au/privacy/privacy-</u> <u>resources/privacy-fact-sheets/other/privacy-fact-sheet-1-information-privacy-principles-under-</u> <u>the-privacy-act-1988</u>

As many of our clients will be aware, from 12 March 2014, the NPPs and the IPPs will be replaced by the Australian Privacy Principles:

http://www.oaic.gov.au/privacy/privacy-resources/privacy-fact-sheets/other/privacy-fact-sheet-17-australian-privacy-principles

ⁱ as defined in the Privacy Act 1988 (Cth)