

**F L O W**  
R E C R U I T M E N T

## Privacy Policy

### Who we are

Flow Recruitment Pty Ltd (Level 9, 401 Collins Street, Melbourne, 3000) provides permanent and temporary recruitment services in the market research sector.

### What does this policy cover?

We take personal data seriously. This policy:

- Sets out the types of personal data that we collect.
- Explains how and why we collect and use personal data.
- Explains how long we keep personal data for.
- Explains when, why and with whom we will share personal data.
- Sets out the legal basis we have for using personal data.
- Explains the effect of refusing to provide the personal data requested.
- Explains the different rights and choices when it comes to personal data.
- Explains how we may contact you and how you can contact us.

### What are our privacy principles?

- We do not collect more information than is necessary.
- We do not use your information for purposes other than those specified.
- We do not keep your information if it is no longer needed.
- We only provide your information to a client when you give us your permission to do so.

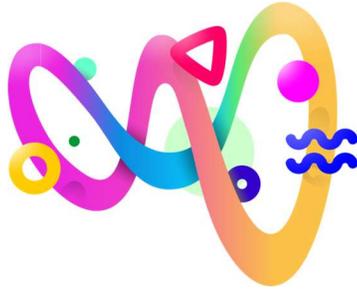
### Why do we hold and process data?

The purposes for which we hold and process data include:

- Assessment
- Recruitment
- Executive Search
- Coaching
- Consulting
- Interim Appointments

### What personal data do we collect about you?

We collect the information necessary to be able to find available and appropriate opportunities and further information needed to assess your eligibility through the different stages of recruitment. This information may include CVs, identification documents, educational records, work history, employment and references.



# F L O W

## R E C R U I T M E N T

We may also collect sensitive personal data about you; we only collect sensitive personal data from you and further process this data where you have given your explicit consent.

### **Where do we collect personal data about you from?**

The following are the different sources we may collect personal data about you from:

- Directly from you. This is information you provide while you are searching for a new opportunity and/or during the different recruitment stages.
- Through publicly available sources such as LinkedIn.
- By word of mouth for example, you may be recommended by a friend, a former employer, a former colleague or even a present employer.

### **How and why we use your personal data?**

We use your personal data to match your skills, experience and education with a potential employer. We will initially collect basic information on you such as contact details, job role and experience. We only ever pass this information on to our clients with your express permission.

### **How do we collect your data?**

#### **i) When you visit our website**

##### **a) When you submit your personal information via our website**

We collect and store information that you submit voluntarily through our website forms for example when you apply for a job position or use our website contact form. We provide a 'consent' option before you send information to us via our website forms, so that you give us consent for your data to be collected and stored. It is then stored according to this privacy policy and is not shared without your express permission.

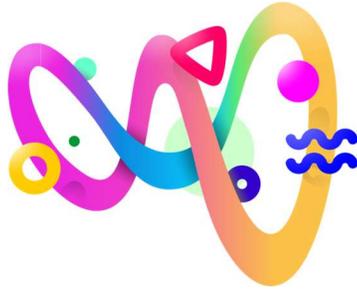
##### **b) Cookies**

You can visit our website without giving away your personal information.

We use cookies on our website; a cookie is a small text file placed on your device when you browse a website. Cookies help us to provide you with a good user experience and allow us to improve the site.

When you first visit our website, we have a visible banner that makes it clear that cookies are used and gives you the opportunity to read more about the cookies we use and why we use them.

Attached to this banner is a button that allows you to consent to these cookies being stored on the device used to access our website. If you click the 'I Consent' button or by continuing to use our site, we take it that you consent to this.



# FLOW

## R E C R U I T M E N T

You can choose to disallow cookies by changing your browser settings. However, by doing so, you may hinder your user experience on this and other websites. You can read more about cookies and how to disallow them here: <http://www.allaboutcookies.org/>.

### c) Analytics cookies

We use Google Analytics to help us understand how you interact with our website by collecting and reporting information anonymously. Aside from the approximate location (IP address), the information collected by Google Analytics is anonymous traffic data including browser information, device information, language. You can read more about Google Analytics Data privacy and security here: <https://support.google.com/analytics/answer/6004245>

### d) Social sharing cookies

We use AddThis sharing buttons and tools so you can easily like or share our content on Facebook, Twitter and other social networks. Some of these social networks set their own cookies for statistical and/or marketing purposes. The privacy implications on this will vary from social network to social network and will be dependent on the privacy settings you have chosen on these networks.

AddThis uses DoubleClick cookies which will track your browsing on any website where those cookies are in place. Those cookies can then be used to serve you interest-based advertising on websites that use DoubleClick advertising systems. We do not serve any advertising of any kind to you on our site, but you do need to be aware that your browsing on our site may contribute to any interest-based advertising that could be served to you on other sites, whilst this cookie is in place in your browser.

You can opt out from using the AddThis/DoubleClick cookie on this page here: <http://www.addthis.com/privacy/opt-out>

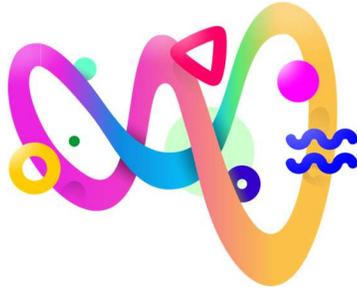
If you would like more information about what other sites might be tracking your browsing to serve interest-based advertising, you can find out more here: <http://www.youronlinechoices.com/uk/your-ad-choices>

### ii) **When you submit your CV to us**

When you submit your CV to us, we collect this personal information you give us for recruitment-related purposes. We may collate it with additional information obtained from publicly available data (i.e. LinkedIn), information from our interactions with you (i.e. interviews, conversations) and sometimes from related third parties (i.e. when you have been recommended to us).

### iii) **When you contact us**

While you can use our website without giving out your personal information, once you contact us via our website or other means, then we collect, process and store the information you have sent us for recruitment-related purposes, such as contacting you.



# **F L O W**

R E C R U I T M E N T

Additionally, we may keep your information for a period of time for the purpose of considering you for different opportunities we recruit for. We always contact you to provide you with the details of these opportunities in the first instance and only when you give your permission would we send your information (i.e. your CV and our interview notes) on to our client/s and/or discuss your data with them.

The information you give us (i.e. your name, email address, telephone number) will be processed and stored so that it is possible for us to contact and respond to your request.

### **How long do we keep your personal data for?**

We keep your information in accordance as follows:

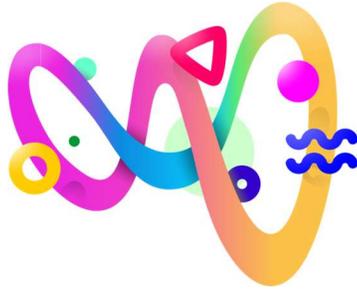
Candidates (either that we have placed or that we have been in contact with but have not placed in a role): 6 years – except for our candidate summary notes which we keep for 10 years.

Client contact details: 4 years

Detailed information can be found in our Data Retention Policy, available upon request.

### **Who do we share your personal data with?**

Your personal data is shared with our clients only when you give us your permission to do so.



# FLOW

## R E C R U I T M E N T

### **What legal basis do we have for using your information?**

For prospective candidates, referees and clients, our processing is necessary for our legitimate interests in that we need the information in order to be able to assess suitability for potential roles, to find potential candidates for clients and to contact clients and referees.

### **What happens if you do not provide us with the information we request or ask that we stop processing your information?**

If you do not provide the personal data necessary or withdraw your consent for the processing of your personal data, we may not be able to match you with available job opportunities.

### **Do we make automated decisions concerning you?**

No. And we do not carry out any automated profiling.

### **How will we contact you?**

We may contact you by phone, email or via LinkedIn. If you prefer a particular contact means over another please let us know.

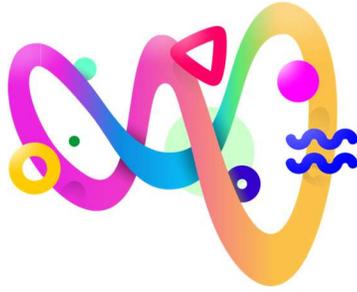
### **How do we keep your information secure?**

We seek to ensure the security of personal information. When we collect information about you, we also make sure that your information is protected from unauthorized access, loss, manipulation, falsification, destruction or unauthorized disclosure. This is done through appropriate technical and organisational measures.

### **What rights do you have in relation to the data we hold on you?**

By law, you have a number of rights when it comes to your personal data:

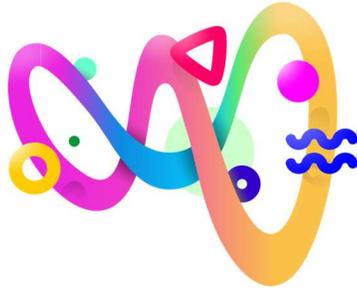
<b>Rights</b>	<b>What does this mean?</b>
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this policy.
2. The right of access	You have the right to obtain access to your information if we're processing it.



# F L O W

## R E C R U I T M E N T

	<p>This is so you're aware and can check that we're using your information in accordance with data protection law.</p>
3. The right to rectification	<p>You are entitled to have your information corrected if it's inaccurate or incomplete.</p>
4. The right to erasure	<p>This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.</p>
5. The right to restrict processing	<p>You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.</p>
6. The right to data portability	<p>You have rights to obtain and reuse your personal data for your own purposes across different services. This enables you to move, copy or transfer your information easily.</p>
7. The right to object to processing	<p>You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).</p>
8. The right to lodge a complaint	<p>You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.</p>
9. The right to withdraw consent	<p>If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.</p>



**F L O W**  
R E C R U I T M E N T

### **How do you access your information?**

You have the right to request access to the information we are storing about you.

You need to complete Data Subject Access Request form which you can request by contacting us at [hello@flowrecruitment.com.au](mailto:hello@flowrecruitment.com.au)

We will provide the information you request within 30 days, following receipt of the request and proof of identity.

We will provide full access to all information concerning you.

We act on requests and provide information free of charge.

### **How can you correct or delete your information?**

If you believe that the information we have about you is incorrect, you are welcome to contact us so we can update it and ensure it is accurate.

If at any point you wish us to delete information we hold about you, please contact us.

For either, please write to James Handley, Director and Data Protection Representative, Level 9, 401 Collins Street, Melbourne, 3000 or email on [hello@flowrecruitment.com.au](mailto:hello@flowrecruitment.com.au) or call James on +61 (0) 408 509 289.

If you have any additional questions about Flow Recruitment Limited's collection and storage of data, please contact us at [hello@flowrecruitment.com.au](mailto:hello@flowrecruitment.com.au) or call James on +61 (0) 408 509 289.

Policy written: November 2018  
Review due: November 2019