

**'YOUR SPARK PTY LTD'**  
**Full Privacy Policy**  
**Nov 2015**



**Introduction**

At Your Spark, we manage personal information in accordance with the *Privacy Act 1988* and *Australian Privacy Principles*.

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.

**Information Flow**

When we collect your personal information:

- We use it for our service delivery with you and we may record and hold your information in our client records .
- We destroy or de-identify your personal information when it is no longer needed for any purpose for which it may be used or disclosed provided that it is lawful for us to do so.
  - We do not destroy or de- identify information that is contained in a Commonwealth record.
  - Subject to some exceptions, we permit you to access your personal information.

**Information That We Collect and Hold**

The type of information that we typically collect and hold is information that is created as a result of our service

- Information collected when you register, which may include personal information such as your name and contact details;
- The content of electronic forms you submit via the website or requesting us to provide services or information, or take action.
- Any messages or comments you submit to us via the website or email- and information collected when you participate in any online career assessment appearing on this website
  - Work history, skills and experience – typically in the form of a resume or CV
  - Any test results supplied by you, or a third party for any test that you have undertaken eg Your Spark personality profiling tool
  - Any notes around your expectations that have been collected during the course of our Professional Service. – including salary expectations, visa status, availability for work etc.

The type of information that we typically collect and hold about Companies is information that is necessary to help us manage the presentation and delivery of our services and includes:

- Contact details – name, position, telephone number, email address, postal address, etc
- Company details – industry, services provided, organisational structures, technologies used, etc
- Preferences and needs – typical skill-sets required, marketing material and event interests, etc

### Purposes

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

For the purposes for which it was collected;

- Where you have consented to the use or disclosure;
- To maintain our relationship with you; ie including having files to hand for future services.
- For purposes related to our commercial management including research, planning, service development, security and risk management;
- Statistical purposes and statutory compliance requirements.

Internal Training – information will be de-identified.

### How Your Personal Information is Collected

Personal information will be collected from you directly when you forward a resume to us or complete online forms or supply any other information in connection with your Professional Service with us.

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 our Privacy Policy.

### Electronic Transactions

We collect personal information that individuals choose to give us via online forms or by email, for example when individuals:

- Make a written online enquiry or email us through our website;
- Submit a resume by email or through our website;

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.

Alternatively, you can contact us by telephone or post if you have concerns about making contact via the Internet.

### How Your Personal Information Is Held

Your Spark uses an electronic database to store personal information which may be cloud-based. As such, personal information is accessible and may be held on portable devices such as mobile phones, laptop computers or in diaries operated and held by our employees.

Personal information is held in our system until it is no longer needed for any purpose for which it may be used or disclosed at which time it will be de-identified 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

- With the majority of the personal information we collect and hold being of an electronic format (soft-copy), Your Spark has strict policies relating to systems access, ensuring that:
- Password protection is a key feature of information security at all times.
- Access to systems and related system permissions is granted based on the individual employee or contractor's role within the organisation; and
- Access to systems is immediately revoked on the termination of an employee or contractor.

Personal or sensitive information contained in a hard-copy format is stored securely when not in use. When hard-copy documentation containing personal or sensitive information is no longer required, Your Spark has a secure disposal unit in which to deposit the documentation for its ultimate destruction.

### Disclosures

We may disclose your personal information for any of the purposes for which it is primarily held or for a lawful related purpose.

### 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 and database designers and Internet service suppliers;
- Legal and other professional advisors;
- Insurance brokers, loss assessors and underwriters;
- Auditors.

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.

### Overseas Disclosures

During the course of our commercial operation some of your personal information may be disclosed to overseas recipients via our contract service suppliers. 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.

### 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.

### Access Policy

If you wish to obtain access to your personal information you should contact our Privacy Officer. We will require a reasonable time (usually 30 days) to respond. You will need to be in a position to verify your identity before any access will be granted. In some cases, we may impose a moderate charge for providing access to personal or sensitive information. We will not charge you simply because you lodge a request for access.

### **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.

### **Website Links & Security**

Our website may contain links to other websites. Linked websites are responsible for their own legal compliance around privacy. You should check those websites for their respective privacy statements and terms of use. We also make no representation as to accuracy or completeness of the information contained in such third party websites.

### **Cookies**

You may enter a web site using cookies 'A cookie is a small piece of text stored on a user's computer by a web browser.' (Definition– Wikipedia ) and the main purpose of cookies is to identify users and possibly prepare customized Web pages for them. When you enter a Web site using cookies, you may be asked to fill out a form providing such information as your name and interests. This information is packaged into a cookie and sent to your Web browser which stores it for later use. The next time you go to the same Web site, your browser will send the cookie to the Web server. The server can use this information to present you with custom Web pages. So, for example, instead of seeing just a generic welcome page you might see a welcome page with your name on it.

### **Third Party Cookies & Tracking**

Your Spark uses Google Analytics to track website traffic and website usage for our website. Google Analytics cookies are used to store information, such as what time the current visit occurred, whether the visitor has been to the site before, and what site referred the visitor to the web page.

**Google Analytics' Terms of Service** prohibits the use of its service for the collection of personally identifiable information, such as your name, address, email address or any other data that can be reasonably linked to such.

### **Opting out of Google Analytics**

A browser Opt –out ad –on is provided, should you not want to be tracked by Google Analytics. This tool prevents Google Analytics from tracking you but does not prevent data from being sent to Spark Recruitment's servers nor any other tracking services/tools that Spark Recruitment may use.

### How Your Spark Handles Cookies and Data on our website

Cookies are an essential part of the workings of our website. Your Spark cookies are first-party cookies and are used only as part of the navigation and do not record any personal information of anyone using the website. Your Spark website cookies are used ONLY within our individual website. No data is automatically transferred between domains except for services that reasonably require such data transference (i.e. paywall). In such cases, we only pass the specific service data required for the proper functioning of the service. Your Spark does not, for any reason, directly access the data provided from these cookies for any purpose(s) outside the reasonable functioning of the website and/or services offered within the website.

Any personal detail which you submit to us (name, address, phone and e-mail details, plus – and including- information volunteered by you) through the website are held by Your Spark for its own use for the purposes of recruitment and/or related services/activities.

By submitting your Personal Data, you CONSENT to it being processed by Your Spark to be used, within reason, for the prosecution of its business. We may use this data to make you aware of additional services that may be of interest to you, or any changes to the site. It is your responsibility to ensure that your Personal Data is accurate and up to date and to inform us of any changes that need to be made.

You have the opportunity to send us your resume online. We guarantee that this resume will not appear on the website but may be stored on our internal database. We will make every effort to ensure your resume is kept secure.

Your Spark maintains email lists. When you registered your details you agreed to opt-in and receive emails from us. Your details will be stored on a database and we may occasionally email you with market information. You will be offered the opportunity to opt in. If you do not wish to receive this e-mail service please notify us of this.

### Complaints

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

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 Coordinator, Lucy Singleton, Your Spark.

You can also make complaints to the Office of the Australian Information Commissioner

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.

### Contact Us

Lucy Singleton

Privacy Officer

Your Spark PTY Ltd

Address: Suite 5, Level 6, 28 Margaret St, Sydney NSW 2000

T: 02 8090 7787 or 0409 152 415

E: [hello@yourspark.com.au](mailto:hello@yourspark.com.au)