

# PRIVACY POLICY / PRIVACY STATEMENT



#### **PRIVACY POLICY**

DWS Ltd ACN 085 656 088 ('DWS') and its related bodies corporate ('we', 'our', 'us') are committed to respecting your privacy. This Privacy Policy sets out how we manage (including the collection, use and handling of) personal information of people who use our website, acquire services from us, or of prospective employees and job applicants. This may include representatives of our corporate customers and people seeking information about our products and services. We are bound by the Australian Privacy Principles ('APPs') under the Privacy Act 1988 (Cth) ('Privacy Act') in the way that it handles personal information.

In this policy 'personal information' means 'information or an opinion about an identified individual, or an individual who is reasonably identifiable (whether the information is true or not or recorded in any form or not)'.

This policy explains the kinds of information collected and held by us, how and why the information is collected and held, used and disclosed, how you may access information held about you to correct it and how you can complain about a breach of the Australian Privacy Principles (APPs).

Where you provide us with your personal information, in person, by email, through this website, on forms, by questionnaires and surveys, over the telephone or through any of our other websites or offices, we will endeavour to ensure that such information remains private and is only used in accordance with this policy. By providing us with your personal information, you also consent for us to collect, hold, use and disclose your personal information in accordance with this policy.

We may amend this Privacy Statement as our business requirements or the law changes. Any changes to this Privacy Statement will be updated on our website. We may also issue specific privacy collection notices from time-to-time relating to particular products or services or particular purposes for which we are collecting personal information.

This Privacy Statement does not apply to personal information collected by us that is exempted under the Privacy Act, for example our employee records.

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

We may collect your personal information from you, including (without limitation) your name, contact details, mailing or street address, email address, age or date of birth, gender, qualifications, work history, your right to work in a particular country, languages spoken, professional memberships and accreditations, your work objectives and other information from your CV, including sensitive information that you supply. This is not an exhaustive list and we may collect other types of personal information. All the personal information we collect is held, used and disclosed for the purposes set out below.

In addition to collecting personal information via our website, we may collect personal information in the following ways:



- by telephone or other means of communication with you or your company (including by email, mail or fax);
- through your use of our website;
- from third parties such as our related entities, recruitment agencies, business partners, other clients and your representatives;
- from publicly available sources of information; and
- from our records of how you use our products or services.

While you can choose to deal with us or access some features on our website anonymously or using a pseudonym, you may be asked to provide certain personal information when using interactive areas of the site. Generally, you have no obligation to provide any information requested by us. However, if you choose to withhold the requested information, we may not be able to provide you with the products and services that depend on the collection of that information.

#### **Use and Disclosure of Personal Information**

We will not use or disclose personal information that we collect for any purpose other than the primary purpose of collection unless:

- Such use is related to the primary purpose and you would reasonably expect us to use or disclose the information for that purpose; or
- The use or disclosure is otherwise permitted under the Privacy Act.

We use and disclose your personal information for the following purposes:

- to provide our services to you, including notifying you in the future about new information relevant to our products, services and opportunities; and
- to maintain our business relationship, where you are a user of our website, a client, employee, prospective employee, investor or other interested party;
- generally for recruitment purposes, including where it is necessary to match your details to job opportunities with us and/or keep you informed of other opportunities and contract assignments which we think may be of interest;
- to answer your inquiry;
- to third parties where we have retained them to provide services, such as those relating to recruitment or our professional advisers;
- to regulatory or law enforcement authorities, if they require us to do so;
- to carry out our core business as the supplier of Information Technology consultancy services and solutions;
- to share the information with our related bodies corporate;
- to monitor your use of our websites; and
- to current or prospective clients as part of providing services to that client, or in submitting proposals to provide future services to that client.

We may also seek your consent to collect, hold, use and disclose your personal information for any other purpose not listed above.



We may combine personal information we receive about you with other information we hold about you. This includes information received from third parties.

We generally do not disclose personal information outside of Australia.

By using our website or disclosing your personal information to us, you will be deemed to consent to us using your personal information collected by us for these purposes.

### Privacy on Our Website - www.dws.com.au

This Policy applies to the domain name of www.dws.com only. It does not apply to, and we are not responsible for, the use of, or the protection of information provided to, other websites linked to our website.

- (a) Submitting Your Curriculum Vitae ("CV") and Applying for Jobs You may submit your CV to us via our website, for general consideration by our recruitment consultants for positions as they arise. Once submitted, your CV will be stored where your personal information can be accessed by any of member of our Recruitment and related teams.
- (b) Aggregate Information About Website Visitors
  We gather information and statistics about all visitors to this and all of our websites worldwide, including the most frequently accessed pages and most frequently used services. We only use such data in aggregate form (this means the information does not identify any one individual) for the purpose of continually improving our online services to create a better overall experience for you.

#### (c) Cookies

A cookie is a small data file which is sent from our web server to your individual web browser when your browser visits our server's website. You can find out more about the use of cookies on <a href="http://www.allaboutcookies.org">http://www.allaboutcookies.org</a>. Cookies are used on our websites to track web traffic on an aggregate basis and to keep session information in cache to assist your use of our website, such as your last search (however, this information is disposed of every time you close your web browser). Most browsers allow you to turn off cookies (see the help menu on your browser).

#### Security

We take reasonable steps to keep personal information secure, accurate and up to date. The Internet is not always a secure method of transmitting information. Accordingly, we cannot accept responsibility for the security of information you send to or receive from us over the Internet or for any unauthorised access or use of that information. Where we have links to a third party, we cannot ensure that your privacy will be protected in accordance with this policy. You should consult these other websites' privacy policies as we have no



control over them and are not responsible for any information that is submitted to or collected by these third parties.

When collected, your information is stored in secure electronic files on our IT system, in storage facilities that we own, operate or control ourselves, or that are owned or operated by our contractors or service providers. We will take reasonable steps to protect the personal information which we hold from misuse or loss and from unauthorised access, modification or disclosure.

We take care to collect and record accurate, up to date and complete personal information. When personal information is no longer needed by us and is not contained in a Commonwealth record and we are not otherwise required by or under an Australian law or a court/tribunal order to retain the information, we shall take reasonable steps to destroy or de-identify the information.

## Access, Correction, Complaints and Further Information

Please contact our Privacy Officer on the details below if you:

- Wish to have access to and/or correct the personal information which we hold about you;
- Consider that the personal information which we hold about you is not accurate, complete or up to date;
- Wish to complain about a breach of the APPs or a registered APP code (if any); or
- Require further information on our personal information handling practices.

We will provide you with access to your personal information held by us, unless we are permitted under the Privacy Act to refuse to provide you with such access or we are not able to provide you such access, in which case we will tell you why. We will also aim to respond to any complaints made by you within a reasonable period of time. We may also need to verify your identity when you request your personal information.

We may recover from you our reasonable costs of supplying you with access to this information. However, we will not charge you for the making of the request or to correct or update your personal information.

If you are not satisfied with our response, you may also contact the Office of the Australian Information Commissioner.



# **Contact Details**

# **DWS Limited**

Contact: Privacy Officer Level 4, 500 Collins Street Melbourne Vic 3000

Tel: (03) 9656 9777 Fax: (03) 9650 9444 Email: dws@dws.com.au

## Office of the Australian Information Commissioner

Website: <a href="www.oaic.gov.au">www.oaic.gov.au</a>
Phone: 1300 363 992