



Condensed Privacy Policy

1. Introduction

We manage personal information in accordance with the *Privacy Act 2020*. This policy applies to information collected by Canterbury Recruitment Ltd T/A CanRecruit.

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.

If you have any questions please contact us:

Warren Falconer
warren@canrecruit.co.nz
03 903 3100

Greg MacKenzie
greg@canrecruit.co.nz
03 903 3101

Information Flow

When we collect your personal information:

- We check that it is reasonably necessary for our functions or activities as an On-hire Firm;
- We check that it is current, complete, relevant, accurate and not misleading. This will sometimes mean that we have to cross check the information that we collect from you with third parties;
- We record and hold your information in our Customer Relationship Management (CRM) System
- We retrieve your information when we need to use or disclose it for our functions and activities. At that time, we check that it is still current, complete, accurate, and relevant and not misleading. This will sometimes mean that we have to cross check the information that we collect from you with third parties once again - especially if some time has passed since we last checked.
- Subject to some exceptions, we permit you to access your personal information in accordance with the New Zealand Information Privacy Principles.
- We may correct or attach associated statements to your personal information in accordance with Principle 7 of the New Zealand Information Privacy Principles.
- 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.

2. Kinds of information that we collect and hold

Personal information that we collect and hold is information that is reasonably necessary for the proper performance of our functions and activities as an On-hire Firm and is likely to differ depending on whether you are:

- a Workseeker
- a Client
- a Referee



2.1. For Workseekers

The type of information that we typically collect and hold about Workseekers is information that is necessary to assess amenability to work offers and work availability; suitability for placements; or to manage the performance in work obtained through us and includes:

- Medical declarations
- Reference checks

2.2. For Clients

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

- H&S/OSH history
- Credit references

2.3. 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 one of our Workseekers for particular jobs or particular types of work and includes:

3. Purposes

The purposes for which we collect, hold, use and disclose your personal information are likely to differ depending on whether you are:

- a Workseeker
- a Client
- a Referee

3.1. For Workseekers

Information that we collect, hold, use and disclose about Workseekers is typically used for:

- work placement operations;
- recruitment functions;
- statistical purposes and statutory compliance requirements;

3.2. For Clients

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

- client and business relationship management;
- recruitment functions;
- marketing services to you;
- statistical purposes and statutory compliance requirements;

3.3. 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;
- Workseeker suitability assessment;



- recruitment functions;

4. How your personal information is collected

The means by which we will generally collect your personal information are likely to differ depending on whether you are:

- a Workseeker
- a Client
- a Referee

We sometimes collect information from third parties and publicly available sources when it is necessary for a specific purpose such as checking information that you have given us or where you have consented or would reasonably expect us to collect your personal information in this way.

Sometimes the technology that is used to support communications between us will provide personal information to us - see the section in this policy on Electronic Transactions.

4.1. For Workseekers

Personal information will be collected from you directly when you fill out and submit one of our application forms or any other information in connection with your application to us for work.

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.

4.2. For Clients

Personal information about you may be collected:

- when you provide it to us for business or business related social purposes;

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.

4.3. For Referees

Personal information about you may be collected when you provide it to us:

- in the course of our checking Workseeker references with you and when we are checking information that we obtain from you about Workseekers;

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.

4.4. Photos & Images

We will not request that you supply photographs, scan photo ID, or capture and retain video image data of you in cases where simply sighting photographs or proof of identity documents would be sufficient in the circumstances.



There will be some circumstances where we do need to obtain a copy of photo ID, for example, to send away with MOJ and ACC pre-employment checks.

4.5. Electronic Transactions

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

- ask to be on an email list such as a job notification list;
- register as a site user to access facilities on our site such as a job notification board;
- 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.

You can contact us by land line telephone or post if you have concerns about making contact via the Internet.

The security product we use is called Security Manager AV Defender and it will update at least once a day when on and connected to the internet. This is managed through Global PC.

See also the following topics:

- Social Networks and Web Searches
- Resume harvesting and job matching software
- Cloud Computing Services
- Emails
- Call and message logs
- Database

5. How your personal information is held

Personal information is held in our CRM 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
- unauthorised access, modification or disclosure.

5.1. Our Information Record System - JobAdder

JobAdder is a cloud-based recruitment management platform for staffing agencies and in-house corporate hiring teams. The solution can be accessed using a web browser on any internet-enabled device.

- Information collected through JobAdder is stored in the Cloud.
- Other information may be collected and stored on our internal server and hard copies may be kept in secure filing cabinets within the CanRecruit office.



5.2. Information Security

The below are some of our staff policies and procedures that protect the information collected:

- Confidentiality Policy
- Code of Conduct
- Communications, Internet and Social Media Policy
- Staff training
- Password protections

6. Disclosures

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

We may disclose your personal information where we are under a legal duty to do so.

Disclosure will usually be:

- internally and to our related entities
- to our Clients
- to Referees for suitability and screening purposes.

7. 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.

7.1. Access Policy

If you wish to obtain access to your personal information you should contact one of our Directors. You will need to be in a position to verify your identity.

7.2. 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.

Complaints

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

For more information see our Complaints Procedure.

7.3. 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 Co-ordinator, whose contact details are *Warren Falconer*: warren@canrecruit.co.nz, 03 903 3100.

You can also make complaints to New Zealand's [Privacy Commissioner, Te Mana Matapano Matatapu](#).

Additionally, you might also need to consider whether the circumstance that give rise to your privacy complaint might be better handled as a personal grievance under the *Employment Relations Act 2000*.

Complaints may also be made to [RCSA](#) the industry association of which we are a member.

RCSA administers a Code of Conduct for the professional and ethical conduct of its members.

The RCSA Code is supported by rules for the resolution of disputes involving members.

NOTE: The Association Code and Dispute Resolution Rules are primarily designed to regulate the good conduct of the Association's members.

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 established 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.