

BREXA ANZ PRIVACY POLICY

1. BREXA ANZ's commitment to privacy

BREXA Pty Limited ACN 628 356 141 and our family of specialist brands operate recruitment and consulting agencies which provide recruitment and advisory solutions across a wide range of sectors. References to "BREXA ANZ", "we" or "us" in this policy mean BREXA Pty Limited of 530 Collins Street, Melbourne, Victoria 3000, Australia in addition to such entities as follows:

- [Albacore Consulting Group Pty Limited](#) (ABN 67 644 577 471)
- [Bluefin Resources Pty Limited](#) (ABN 48 106 436 837) (Bluefin Resources)
- [Clicks Recruit \(Australia\) Pty Limited](#) (ABN 87 078 625 242) (Clicks)
- [Hoban Recruitment Pty Limited](#) (ABN 88 052 201 313) (HOBAN)
- [RED Appointments Pty Limited](#) (ABN 35 138 057 511) (RED)
- [Staff Solutions Bilingual](#) (ABN 88 052 201 313) (Staff Solutions)
- [HorizonOne Recruitment Pty Limited](#) (ABN 98 129 885 838) (HorizonOne)
- [INDEX Consultants Pty Limited](#) (ABN 33 123 720 043) (INDEX)
- [Jigsaw Search Pty Limited](#) (ABN 92 122 998 743) (Jigsaw)
- [Kinetic Employment Limited](#) (NZBN: 9429030250765) (Kinetic)
- [Marble Group Pty Limited](#) (ABN 93 119 778 193) (Marble)
- [PM-Partners](#) (ABN 13 084 197 795) (PM Partners)

As Australian Privacy Principles (APP) entities under the Privacy Act 1988 (Cth) (**Privacy Act**) or an agency under the Privacy Act 2020 (New Zealand) (**New Zealand Privacy Act**), BREXA ANZ take collecting, holding, storing, using and sharing your personal information (as further explained [below](#)) very seriously. As we may sometimes work as a contracted service provider to a range of Commonwealth, State and Territory or New Zealand government agencies, different privacy arrangements may apply when we are working with these agencies who handle obligations under State, Territory, Commonwealth or New Zealand laws. If you wish to know whether this applies to you, please [contact us](#).

We strongly encourage you to read this document, so that you understand how we handle your personal information. If you have any questions about this document, or about BREXA ANZ's handling of your personal information, please contact us using the relevant contact details set out at section 18.

2. Your acknowledgment of our Privacy Policy

By accessing our website and submitting your personal information to BREXA ANZ through any means, you acknowledge that we may handle your personal information as set out in the Policy. If you do not agree with any term of this policy, please do not submit any personal information to us or use BREXA ANZ's services or website.

This policy may change over time as set out in section 17 below. If you use our website or services regularly it is important that you check this policy regularly.

3. About this Privacy Policy and when it applies

This document sets out our policies for managing your personal information and is referred to as our

Privacy Policy. In this Privacy Policy:

- “**Candidate**” refers to individuals who engage with us as a job candidate or potential job candidate, including by submitting a job application to us or by registering your interest through any of our available online portals found on our websites. This includes job candidates who are successful in gaining a placement at a Client organisation;
- “**Client**” refers to organisations or government agencies that we contract with to assist with their recruitment needs;
- “**Contractor**” refers to either an individual contractor who supports, or a participant in a program run by, any of our entities;
- “**Referee**” refers to third-party sources that you, as a Candidate, list as your nominated job reference; and
- “**you**” and “**your**” refers to any individual from whom we collect personal information, including Candidates, Clients (to the extent they are individuals or represented by an individual), Contractors and Referees; and
- “**Privacy Laws**” refers to the Privacy Act, the *Spam Act 2003* (Cth) (**Spam Act**), the *Do Not Call Register Act 2006* (Cth) and the New Zealand Privacy Act (as applicable), including any applicable delegated legislation or codes enacted under these laws.

This Privacy Policy sets out how we collect, store, process, use and disclose personal information (including personal information we collect, and personal information submitted to us, whether offline or online). For example, this may include information we collect from you:

- as a Candidate, Contractor, Client and/or Referee;
- as a supplier to us;
- when you apply for a job with BREXA ANZ; or
- when you otherwise interact with us, including by:
 - visiting any of our website;
 - sending us an enquiry or providing us with feedback; or
 - asking us to send you information about potential job placements at our Client organisations.

Other privacy related notices and terms and conditions may apply to you, such as a privacy collection notice provided (either verbally or in writing) or any consent that you supply:

- when you register your interest with us as a Candidate or as a Contractor;
- when we contact you as a Referee for a relevant Candidate;
- when you engage with us or our services as a Contractor;
- when you apply for a role with a BREXA ANZ entity or accept a position to work with a BREXA ANZ entity; or
- in relation to the collection of sensitive information (as further explained [below](#)).

4. What is personal information?

During the recruitment process or in the course of the services we operate, we may collect “personal information”. “Personal information” is defined in the Privacy Act, and means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

Type of personal information	What this includes	How do we collect this information?
Personal and contact details	This may include your: • full legal name; • email address; • phone number; • address; and • employee identification number.	We will collect this information directly from you (including if you are a Candidate or a Contractor) when you: • register your interest through our online portal available at any of our websites or job boards; • register for notifications in relation to future job notifications; • apply for a role advertised on our website; • approach us directly, for example via mail, email, phone, fax or in person; • when you attend a conference of networking event where BREXA ANZ is present; • use web-based application and placement management applications to submit identification documents, receive job offers; • complete online interviews and assessments, submit references, undertake onboarding and inductions, or upload time sheets; • otherwise provide, use or participate in services supplied by or to Brexa ANZ. If you are a Referee, we will collect this information when we contact you either by phone, email or in person in the course of checking a Candidate's or a Contractor's references and when we are checking information that we obtain from you about Candidates or Contractors.
Information about your profession, skills, qualifications and relevant experience	This may include your: • education, qualifications and certifications; • professional memberships, associations, affiliations with relevant industry bodies or organisations; • employment history; • relevant volunteer or unpaid work; • awards, recognition and special achievements; • skill-specific licences (e.g. a forklift licence); • interview results; • membership to trade unions or association; • aptitude/psychometric test results (if relevant); and • details of Training undertaken, or being undertaken by you, your results and records, training plans as well as personnel records.	We may collect this information directly from you (usually via your resume if you are a Candidate or Contractor) when you: • register your interest through any of our online portals available; • apply for a role advertised on our website; • register your interest to any of our Capability Hubs available; • register your interest to any of our Feedback Hubs available; • register your interest to any of our Knowledge Hubs available; • approach us directly via email or phone; or • otherwise provide, use or participate in services supplied by or to BREXA ANZ. We may also collect this information from third parties, for example, referees, previous employers, professional registration authorities, educational institutions, or through our third-party providers such as: • OHS/WHs induction and work rights

	Some of this personal information may also be sensitive information.	onboarding providers; • skills testing and data entry providers; • interview platforms; and • psychometric assessment provider. If you are a Referee, we may collect this information when we contact you either by phone, email or in person.
Identification documents	This may include your: • passport; • birth certificate; • drivers' licence; • visa (if applicable); and • other identification documents.	We may collect this information from Candidates or Contractors when you: • log in to our online portal using the credentials we provide in our Welcome Email and complete your onboarding; • participate in our candidate screening and assessment process; and/or • otherwise provide, use or participate in services supplied by or to Brexa ANZ. We may also collect this information from Candidates and Contractors through our third-party providers, such as those who conduct OHS/WHS induction and work rights onboarding on our behalf. If you are a Referee, we may collect this information when we contact you either by phone, email or in person (if required).
Information about your accessibility requirements	This may include sensitive information, such as details about your health and any disabilities you have.	If you are a Candidate or Contractor and email us to request an adjustment to be made during the recruitment process due to a disability, we may collect this information.
Background check information	This may include your: • Working With Children check clearance number; and/or • national police check information (if applicable). Some of this personal information may also be sensitive information.	If you are a Candidate or Contractor, we may collect this information directly from you when you participate in our screening and assessment process: We may also collect this information: • from third parties (for example, verification providers, referees, previous employers, professional registration authorities or educational institutions); and/or • publicly available information (for example, court decisions).
Information about your work performance, and employment health and safety	This may include: • performance review information; • <u>information about</u> incidents at the workplace; and • other information obtained or received by us in connection with your possible and actual work placements. Some of this personal information may also be sensitive information.	If you are a Candidate or a Contractor, we may collect this information from third parties (for example, employers with whom we have placed you) when: • we receive reports of your performance from employers with whom we have placed you; and/or • we reasonably believe that your being in, or remaining in, a position might present a risk to your health and safety or to that of others for whose health or safety we are

		responsible. If you are a Contractor, we may collect information about your performance in your course of work for us in our training programs.
Banking, tax, ABN and superannuation details	This may include: • Tax File Number; • Australian Business Number; • superannuation fund details; • credit card information; • credit history; and • bank account details.	We collect this information directly from Candidates and Contractors via our payroll portal when your placement at an on-hire assignment has been confirmed or where otherwise required for payment. We may also collect information from consumer reporting agencies such as your credit history.
Health information	This may include vaccination or medical test results. This is sensitive information. Some of this personal information may also be sensitive information.	We may collect this information directly from Candidates and Contractors: • when you complete our pre-employment health questionnaire as part of the onboarding process; • during functional assessments prior to placement (if required); • during drug and alcohol assessments (if required); and/or • through other means as required for potential or actual placements where this is an inherent requirement (for example, certain roles with our clients in the Healthcare industry).
Information about another person	If you are a Candidate or Contractor, this may include your Referees: • full legal name; • email address; • phone number; and • address. If you are a Referee, this may include: • information about your contract details; • information about your employment experience; • information about your relationship and knowledge and opinions of the Candidate or Contractor, as relevant to the reference we are seeking; • information obtained or received by us in connection with the verbal or written reference; and • other background information about the Candidate or Contractor.	You may provide us with personal information which relates to another person, including contact details of your Referees. If you do so, you agree that you have received permission from these individuals for us to collect, use, and share, their personal information in accordance with this Privacy Collection Notice. You should also let them know about this Privacy Policy (including the information in any Privacy Collection Notice).

	If you are a Client, this may include: • employee contact details (including their name and email address); and/or • roles and reporting lines.	
Job description information	This may include: • roles, reporting lines and inter-personal communication within your organisation; • business, social, or personal interests about which we may be able to provide news and information; and/or • celebration milestones and dates, preferred social media contact channels that you choose to share with us.	We may collect this information from Clients when you contact or otherwise engage with us to source a candidate or recruit through us.
Biometric information	This may include fingerprint, voice or facial recognition. Some of this personal information may also be sensitive information.	We may collect this information from employees and other individuals whom we have engaged through biometric technologies and in accordance with Privacy Laws. For example, we use a third-party application/time clock to conduct facial recognition of you when you clock in and clock out of your work shifts.
Online and digital services information	This may include information (that is not always identifiable) about your: • device ID; • device type; • geo-location information; • IP address; • browsing information, including information about how you interact with our website; and/or • information collected from Cookies and other online tracking technologies (see section 13below).	If you only browse our website, we do not collect information that identifies you personally, though we may collect information related to your visit to our website. Our websites may include links to external websites operated by other third-party services including Google and Meta. They may collect data related to your visit through tracking technologies we use for analytics and marketing purposes. These third-party services may link this information to your personal profiles on their platforms if you are logged in. Please note that how these third parties handle and use your data is governed by their own privacy policies. We recommend reviewing their privacy policies for more information on their data collection practices and options available to you for managing your privacy.
Unsolicited information	Unsolicited personal information is personal information we receive that we have taken no active steps to collect (for example, an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement).	We may collect this information directly from you. Please note that we may keep records of unsolicited personal information to the extent that it is permitted by Privacy Laws.
Publicly available information	Information that is publicly available online, such as on online forums, websites, newspapers, journals, directories, the Internet and social media sites.	We may collect this directly from the publicly available source (e.g. internet search engines like Google, platforms like Seek, or social media channels like LinkedIn).

Personal information does not include aggregated, de-identified or anonymised data.

5. What is sensitive information?

During the recruitment process or in the course of the services we operate, we may collect personal data that is considered “sensitive information”. “Sensitive information” is a special category of personal information under the Privacy Act. It involves certain categories of personal information, including membership of a professional or trade association or membership of a trade union; criminal record; health information, racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, and sexual preferences or practices.

6. What information do we collect about you and how do we collect this information?

Normally we collect your personal information from you directly, however, in some circumstances, we may also collect personal information about you from other people and organisations that we work with as part of recruitment.

The types of personal information that we collect about you will depend on how you interact with us and the type of dealings you have with us. Generally speaking, the kinds of personal information BREXA ANZ collects may include:

7. Can you deal with us without providing your personal information?

You are under no obligation to provide your personal information to BREXA ANZ. However, without certain information from you, we may not be able to provide you with the full suite of services that is ordinarily offers. For example, if you are a job applicant or potential job applicant and do not provide your personal information, we may not be able to process or progress your job application.

8. Why do we collect, store and use your personal information?

We collect personal information that is necessary to provide you with our recruitment services, and to carry out our business.

The specific purposes for which we usually collect, store, and use your personal information depends on how you interact with us (for example, whether you are a Candidate or a Referee) and may include the following purposes:

Purpose	Explanation
To facilitate Candidate’s actual or possible placement in employment with our Clients, or to provide other recruitment-related services	We may collect, store and use your personal information to: • verify your identity as a Candidate or Referee; • verify your right to work in Australia; • contact you to complete your registration and onboarding as a candidate with BREXA ANZ; • assess your suitability for registration with us; identify work placement opportunities; • identify your training needs; • validate (including from appropriate third-party sources such as the police, your referees, etc) your resume, nominated references,

	stated qualifications, experience, training or abilities. Where we require third party validation, we will tell you how we propose to obtain it • make suggestions to you, whilst you remain registered with us, for further training in connection with work of the type that you are seeking through us; • complete payroll functions; • make reasonable adjustments for you during the registration and onboarding process; and/or • notify you about our services and flag work opportunities or training or development opportunities available, including job opportunities that we think might interest you (in accordance with applicable Privacy Laws). In addition, we also use and disclose your personal information to third parties for these purposes, including: • reference checking providers, to enable them to provide you with a link to enter the contact details of your referees; • OHS/WHS induction and work rights onboarding provider, to provide you with a link to review this information and complete training which is required by law; • potential and actual employers and clients of BREXA ANZ, as well as certain third-party service providers that provide BREXA ANZ's with technologies we use to assist us with assessing your suitability for work placement opportunities and communicating with you; • third-party service providers who require you to conduct an aptitude test or interview via a third-party platform to assist us with assessing your suitability for work placement opportunities; and/or • appropriate third-party sources such as your Referees, to validate your resume, nominated references, stated qualifications, experience, training or abilities. If you are a Referee, we collect, store and use your personal information: • to confirm identity and authority to provide references; • for Candidate suitability assessment; and • general recruitment functions.
To fulfil our post-placement obligations, including managing any candidate replacement guarantee to our Clients	We may collect, store and use your personal information: • for the purpose of your performance appraisals; • to assess your suitability to be placed in or continue in positions that you may be offered; • to manage any workplace rehabilitation in which you and we are involved; • in relation to our management of any complaint, investigation or inquiry in which you are involved; • in relation to any insurance investigation/claim, litigation or proposal that requires disclosure of your personal or sensitive information; and/or • to provide a reference concerning your work.

To promote our recruitment services – see section 14 for further information on direct marketing	We may collect, store and use your personal information to send you direct marketing from BREXA ANZ, including legislative updates, newsletters and/or notifications of our available jobs that may be of interest to you, as otherwise allowed under applicable Privacy Laws.
To manage your working relationship with us (including if you are an employee or contractor)	We may collect, store and use your personal information to assess your suitability for a position with BREXA ANZ (note: this does not include positions with our Clients), and, if you successfully join us, to manage our working relationship with us.
To do business with you	We may collect, store and use your personal information about you if you interact with us on a commercial basis (such as if you are a service provider, contractor or supplier to us), or you otherwise interact with us on a commercial basis, in connection with that interaction or our engagement with you. If you are a Client, we may collect store and use your personal information for: • business relationship management; • to fulfil our recruitment functions; and • marketing our services to you.
To create deidentified or aggregate data and to otherwise perform data analytics and facilitate automation, and through the use of AI	We may collect, store and use your personal information to assist with our business decisions, such as to: • help us in understanding trends in Candidate behaviour (such as the main industries our Candidates are looking for placements in); • perform research and statistical analysis, including for service improvement purposes; and • improve the job opportunities and services we offer. As far as possible, we take steps to first de-identify or aggregate your information such as combining your information with information we have about, for example, our other Candidates, and with data we obtain from other sources. In some circumstances, we may use AI (including generative AI) tools to manage and improve our data health, review your applications, assist us with assessing your suitability for work placement opportunities and match you with suitable opportunities, communicating with you (including crafting responses) and otherwise making decisions about your engagement or employment.
To comply with our legal and regulatory obligations	We may collect, store and use your personal information for the purpose of complying with our obligations under any applicable laws and regulations, including Privacy Laws, as well as required under contracts and as part of our own legitimate interests. Equally, we may also collect, store and use your personal information to exercise our rights. This includes for the purpose of audits of BREXA ANZ's compliance. Some laws such as taxation law, immigration law, laws regulating employment agencies, laws relating to national security, laws relating to professional or trade registration, labour hire licensing laws, public health laws, and laws for the protection of certain classes of people (such as children or the elderly) may also require us to collect certain types of information (including criminal history and evidence of your right to work) from you that is relevant to the position/s for which you may be applying.

To assist with any business, share sale or corporate restructure	We may collect, store and use your personal information for the purpose of facilitating or implementing a transfer or sale of all or part of our assets or business or if we undergo any other kind of corporate restructure, acquisition or sale.

BREXA ANZ may anonymise information collected from you in order to promote you as a suitable candidate to our Clients via our website, Social Media and email marketing.

9. Do we use your personal information for any automated decisions?

On some occasions, we may use or disclose your personal information for automated decision making (i.e. a decision, or something which is substantially and directly related to making a decision, which takes place solely through the use of computer programs or where computer programs are substantially and directly related to the making of the decision). This helps us to ensure our decisions are quick, fair, efficient and correct, based on what we know.

The kinds of personal information which we use to make these automated decisions include: your name and other details that you have included in your application, such as your previous experience and your right to work in the relevant country in which an opportunity for work placement arises.

The kinds of decisions that computer programs help us to make include:

- whether your application meets key criteria for a specific opportunity; and
- whether and how to shortlist your application for a specific opportunity.

Please note that such decisions may also be made by our contracted service providers (CSPs) on BREXA ANZ's behalf.

10. How do we store and protect your personal information?

We are committed to adequately protecting your personal information. Your information may be stored in hard copy (paper) or electronic format, in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers.

We take all reasonable steps to ensure that any personal information we collect, use or disclosure is accurate, complete, up-to-date and stored to protect against:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

To protect personal information from misuse, interference, loss, or from unauthorised access, modification or disclosure, BREXA ANZ will use an appropriate combination of:

- physical measures including physical barriers;
- alarm systems;
- access technology; and

- administrative protocols, to exclude unauthorised persons or intruders from gaining access to information.

If you have reason to believe that any account with us is no longer secure, you must immediately notify us of the problem.

10.1 How long do we keep your personal information?

We will only keep your personal information stored until it is no longer necessary for any purposes set out in this Privacy Policy or as required to comply with any applicable legal obligations. When we no longer require your personal information, we will take reasonable steps to delete, de-identified or destroy that information (provided that it is lawful for us to do so).

11. Who do we disclose your personal information to and why?

We may share your personal information with third parties:

- for the reasons for which we collect, store and use that information (see above in section 8);
- for other purposes explained at the time we collect your personal information; or
- where we are otherwise allowed or required to do so under law.

Some of the third parties we may share your information with include the following:

Recipient	Explanation
BREXA ANZ's related entities, our subsidiaries and associated companies	We may share your personal information across BREXA ANZ's related entities, our subsidiaries and affiliated brands (where appropriate). For example, we may share your personal information to another BREXA ANZ's related entity where that entity requires access to your personal information to provide us with IT support or other back-end services.
Corporate restructure	We may share your information with third parties, whether affiliated or unaffiliated, for the purpose of facilitating or implementing a transfer or sale of all or part of our assets or business or if we undergo any kind of corporate restructure, acquisition or sale. In this context, your personal information may be transferred to another entity (or if such a sale, transfer, acquisition or corporate restructure is being contemplated by us).
Potential and actual employers and clients of BREXA ANZ	We may share your personal information with potential and actual employers and clients of BREXA ANZ to facilitate your actual or possible work placement.
Our external contracted service providers (CSPs) and advisors	We may share your personal information with a variety of our CSPs to assist us with delivering, promoting and managing our services. These may include: • CSPs who assist us during the onboarding process; • CSPs that conduct aptitude testing and/or online interview platforms; • companies we (or our Clients) partner with to provide probity/assessment or auditing services, for example validation of work rights, reference checking, criminal background checking, skills testing, psychometric assessments; • specialist software vendors;

	• legal and other professional advisors (such as insurance brokers, loss assessors, underwriters and financial advisors); • superannuation fund managers; • background checking and screening agents; • external consultants in assisting us with our information technology needs; • CSPs involved in managing or administering BREXA ANZ's services, for example our marketing consultancy, administrative support provider, payroll support provider, internet service suppliers and database technicians; • legal and professional advisers, for the purpose of obtaining advice; and/or • other organisations involved in our normal business practices.
Medical professionals, medical facilities or health authorities	In some cases, we may share your personal information with medical professionals if a medical assessment is required as part of placing you into a job or in the event that you are involved in a workplace accident or injury that requires medical attention.
Professional associations or registration bodies	We may share your personal information with a professional association or registration body that has a proper interest in the disclosure of your personal and sensitive information.
Referees	We may share your personal information with your nominated referees to validate details you have provided us with, including your resume, qualifications, experience, training or abilities.
Person seeking a reference	We may share your personal information with a person who seeks a reference about you.
Government and law enforcement agencies	We may share your personal information with government or other law enforcement agencies: • if they have a lawful entitlement to obtain the information; • if we are required to do so to meet our legal compliance obligations (for example, the Australian Taxation Office); and/or • to conduct a background check (for example, a criminal background check).
Insurers for Workers Compensation or a Workers Compensation body	We may share your personal information with our insurers for workers compensation or the workers compensation body in the event you are involved in a workplace accident or injury that results in a claim.
Parent, guardian, holder of an enduring power of attorney (or like authority) or next of kin	We may share your personal information with a parent, guardian, holder of an enduring power of attorney (or like authority) or next of kin whom we may contact in any case in which consent is required or notification is to be given and where it is not practicable to obtain it from or give it directly to you.

Marketing organisations	We may share your information with marketing organisations that assist us with our marketing communications or who send you marketing communications on our behalf. Please see the 'Do we use your information for direct marketing' at section 14 below for further information on how we engage in direct marketing.
--------------------------------	--

12. Do we share your personal information overseas?

We generally collect your personal information in Australia or New Zealand (as applicable). However, it is likely that we will share your personal information with overseas recipients. These recipients include BREXA ANZ's representatives based outside of Australia and/or New Zealand as well as our service providers who may handle, process or store your personal information on our behalf (e.g., Google Analytics servers in the United States).

We may also disclose your personal information to other members of the BREXA ANZ (for example, to facilitate opportunities which may be relevant to a Candidate) including our subsidiaries and associated companies (for example, where that member requires access to your personal information to provide us with payroll, accounts and administrative support services or other back-end services). The countries in which the overseas recipient to whom we are likely to disclose your personal information are to be located are as follows:

- Australia;
- New Zealand;
- Philippines;
- United Kingdom;
- Ireland;
- USA;
- Japan; and/or
- India.

13. How do we interact with you via the internet?

13.1 Third party links and sites

When you use our website or receive communications from us, links to websites which belong to other third parties may be included (and are provided for your convenience). You should make your own enquiries as to the privacy policies of these parties. We are not responsible for information on, or the privacy practices of, any third-party websites.

13.2 Website use and cookies/online tracking technologies

BREXA ANZ may collect information when you access and use our website and any online platforms available via our websites (such as our online portal), by utilising features and technologies of your internet browser or embedded in web content, including cookies and other online tracking technologies. Cookies and other online tracking technologies collect data about website traffic, assist in managing customised settings of the website and help deliver content. We collect certain information such as device type, IP address, and browsing information this way.

We use this information to analyse how our website is being used, to improve our website and provide you with a more use-friendly and customised website experience. These features and technologies do not identify you unless you provide personal information to us that enables identification. In relation to cookies, if you do not wish to receive any cookies (other than those that are strictly necessary), you may use the settings in your browser to control how our browser deals with cookies. Generally, you can opt out of Google Analytics if you disable or refuse the cookie,

disable JavaScript or use the opt-out service provided by Google. However, this may slow down or cause certain web pages to be inaccessible to you.

Third-party services, such as Google and Meta, may also collect data related to your visit through these tracking technologies we use, for analytics and marketing purposes. These third-party services may link this information to your personal profiles on their platforms if you are logged in. Please note that how these third parties handle and use your data is governed by their own privacy policies, not ours. We recommend reviewing their privacy policies for more information on their data collection practices and options available to you for managing your privacy.

14. Do we share your personal information for direct marketing?

BREXA ANZ and/or our third party service providers may use your personal information to send you direct marketing information about legislative updates, newsletters, or as otherwise allowed under applicable Privacy Laws.

You can opt-out at any time using the methods described in the communications. You can also contact us using the details set out in section 18 of this Privacy Policy to tell us you would like to stop receiving direct-marketing communication from us.

15. How can you access or seek correction of your personal information?

You are entitled to request access to and/or correction of any of your personal information that we have. To make such a request, please follow the process set out below.

We may decline your request to access or correct your information in certain circumstances in accordance with the applicable Privacy Laws. If we do refuse your request, we will provide you with a reason for our decision.

15.1 Requests for access

If you wish to obtain access to your personal information you should contact our Privacy Officer using the contact details set out below in section 18. You will need to be in a position to verify your identity.

We may impose a charge for retrieving and providing access to your personal information.

15.2 Requests for correction

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, up-to-date and complete. You can help us do this by contacting us if you notice errors or discrepancies in information we hold about you and informing us of any change in your personal details (for example, if your email address changes or if you move and change address), using the details set out below in section 18.

16. Making a complaint about the handling of your personal information

If you have any questions or concerns about this Privacy Policy or how we have handled your personal information, you may contact us at any time using the relevant contact details set out below in section 18.

Please also contact us if you have a complaint about our handling of your personal information or 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.

If we receive your complaint about privacy, the following will occur:

No.	Step
1.	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.
2.	Upon confirmation of the above from you, we will generally write to you to acknowledge receipt and to confirm that we are handling your complaint in accordance with our policy within a week. We will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. For example, if your complaint can be resolved by procedures for access and correction (see section 15 above) we will suggest these to you as possible solutions.
3.	If your complaint requires more detailed consideration or investigation: • we may ask for clarification of certain aspects of the complaint and further details about the outcome you are seeking; and • we will make inquiries of people who can assist us to establish what has happened and why, and generally endeavour to complete our investigation into your complaint promptly (including gathering relevant facts, locating and reviewing relevant documents and speaking with the individuals involved).
4.	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. In most cases we will acknowledge receipt of a complaint within 14 days of receiving and respond to your complaint within 30 business days from when we receive your complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to a complaint, or you consider that we may have breached the Privacy Laws (as applicable), you are entitled to make a complaint to the Office of the Australian Information Commissioner (the Australian privacy regulator) or the Office of the Privacy Commissioner (the New Zealand privacy regulator).

The Office of the Australian Information Commissioner can be contacted by telephone on +61 (1)300 363 992, or you can fill out this [form](#) to make a complaint about our handling of your personal information. Full details for the Office of the Australian Information Commission can be found online at <https://www.oaic.gov.au/>.

The Office of the Privacy Commissioner can be contacted by telephone on +64 (1)800 803 909, or you can fill out this [form](#) to make a complaint about our handling of your personal information. Full details for the Office of the Privacy Commissioner can be found online at <https://www.privacy.org.nz/>.

As not all of our entities are members of the Recruitment, Consulting & Staffing Association (RCSA), complaints with regard to those entities' professional and ethical conduct cannot be referred to the RCSA. In this instance, you can make further inquiries to our Inquiry Desk whose contact details are provided in this Policy under section 18.

17. How are changes made to this Privacy Policy?

We may make changes to this Privacy Policy. We recommend you visit this Privacy Policy regularly to keep you up to date with any changes we make.

18. How can you contact us?

If you wish to contact us about your personal information you should contact our Inquiry Desk at info@brexa.com.au.