

Arenite Specialty Australia Pty Ltd
Recruitment Privacy Notice

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Contents

1	Introduction	3
2	Definitions	3
3	How we collect your Personal Information.....	3
3.1	How do we collect your Personal Information?	3
3.2	What Personal Information will we collect and hold?.....	4
3.3	For what purposes will we collect, hold, use and disclose your Personal Information?	4
3.4	How do we store your Personal Information?.....	5
3.5	How long will we keep your Personal Information?	5
4	Sharing and transfer of your Personal Information	5
5	Your rights in relation to your Personal Information	5

1 Introduction

The purpose of this recruitment privacy policy (the "**Privacy Policy**") is to provide you with information about how Arenite Speciality Australia Pty Ltd ("**Arenite**", "**we**" or "**us**") collects, uses, hold and discloses your Personal Information. If we handle any information that identifies you, either alone or alongside other information we hold, this is your **Personal Information**. We are required to comply with applicable laws relating to the handling of your Personal Information, including the Privacy Act 1988 (Cth) ("**Privacy Act**"). Under these laws, we need to give you the information set out in this Privacy Policy so that you know how your data is handled by us.

We will inform you of any changes to this policy by email. If after reading this Privacy Policy you have any questions, wish to file a complaint, or need to communicate with us about our handling of your Personal Information, you can contact us at dataprotection@fidelispartnership.com.

2 Definitions

In this Privacy Policy, the below terms have the following meanings:

" **Data Protection Laws**" means any applicable laws, regulations, rules or orders around the collection, holding, use, disclosure or protection of Personal Information that are applicable to Arenite, including (i) the Privacy Act and (ii) the APPs.

"**Employees**" means the employees, directors, temporary employees, and interns of Arenite.

Arenite may from time to time appoint **non-executive directors** of the business, and the term "**Employees**" in this policy will apply to these non-executive directors unless this policy states otherwise.

"**Employee Record**" means a record of Personal Information relating to your employment. This includes health information about you and Personal Information about your engagement, training, disciplining or resignation; the termination of your employment; the terms and conditions of your employment; your personal and emergency contact details; your performance or conduct; your hours of employment; your salary or wages; your membership of a professional or trade association; your trade union membership; your recreation, long service, sick, personal, maternity, paternity or other leave; or your taxation, banking or superannuation affairs.

"**Personal Information**" means any information relating to an identified or reasonably identifiable natural person.

"**Sensitive Information**" means any information that reveals racial or ethnic origin, political opinions or associations, religious or philosophical beliefs, trade union membership, sexual orientation or practices, criminal record, health or genetic data information, or some aspects of biometric information.

3 How we collect your Personal Information

3.1 How do we collect your Personal Information?

We collect Personal Information about prospective employees through our application and recruitment process, either directly from you, from an employment agency or from our background check provider.

We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies (such as for screening purposes). We may collect information about you that is publicly accessible, for example through LinkedIn.

As part of our screening process, the background check agency that we partner with uses an artificial intelligence (“AI”) tool to screen your Personal Information as part of the social media check. All information which is flagged by the background check agency is then reviewed by a member of our HR team to verify its accuracy.

If we receive your application through a recruitment agent, they may send an anonymised CV or they may send us your name and information contained in your CV. All the information you provide during the recruitment process will only be used for progressing your application, or to fulfil legal or regulatory requirements where necessary.

3.2 What Personal Information will we collect and hold?

We may collect and hold any of the following categories of Personal Information about you:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience, and employment history;
- information about your current level of remuneration, including benefit entitlements;
- your desired salary and benefits;
- information of your entitlement to work in Australia;
- evidence of your entitlement to work in Australia; and
- details of any disability for which the organisation needs to make reasonable adjustments.

3.3 For what purposes will we collect, hold, use and disclose your Personal Information?

We will collect, hold, use and disclose your Personal Information to allow us to review and progress your application. This includes making a decision about your recruitment or appointment, determining the terms on which you will work for us, assessing your qualifications for a particular role and equal opportunities monitoring. We may also use or disclose your Personal Information where necessary for us to comply with a legal obligation under Australian law.

“**Sensitive Information**” means any information that reveals racial or ethnic origin, political opinions or association, religious or philosophical beliefs, trade union membership, sexual orientation or practices, criminal record, health or genetic data information, or some aspects of biometric information. We will only collect your Sensitive Information where you have provided your consent and the information is reasonably necessary for one or more of our functions or activities otherwise authorised by law.

In particular, where permitted by law:

- we may use information about your physical and mental health, or disability status, to ensure your health and safety in the application process and provide appropriate adjustments; and
- we may also use information about your race or national or ethnic origin, religious, philosophical, or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

If you do not provide the Personal Information that we request, we may be unable in some circumstances to provide you with certain services as your employer and we will tell you about the implications of that decision.

3.4 How do we store your Personal Information?

We store the Personal Information that we collect in electronic databases, some of which may be held on our behalf by third party data storage providers. Information is kept secure and only accessible by authorised staff.

3.5 How long will we keep your Personal Information?

If your application for employment is unsuccessful, we will hold your Personal Information for six months after the end of the relevant recruitment process. If your application is successful, your Personal Information will be subject to the retention periods set out in the relevant employee privacy policy.

If in the future we intend to use or disclose your Personal Information for a purpose other than or unrelated to that for which it was originally collected, we will seek your consent to use or disclose your Personal Information for that new purpose.

4 Sharing and transfer of your Personal Information

Your information may be shared internally within Arenite for the purposes of our recruitment process. This includes interviewers involved in the recruitment process and managers in the relevant business area.

In certain circumstances, we may need to share your Personal Information with third parties, where required by law or where we have a legitimate interest in doing so. This includes:

- (i) your previous employer and any university and other further education establishments you may have attended, in order to verify the information which you have provided to us about your work history, education and qualifications;
- (ii) providers of National Police check and credit reference checks; and
- (iii) regulatory bodies or law enforcement agencies, where we receive a request that we are legally required to comply with.

For the above purposes, we may transfer your Personal Information outside Australia. Where your Personal Information is transferred outside Australia to a jurisdiction that is not subject to a substantially similar law or binding scheme, we will take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to your Personal Information. You may request a copy of the specific safeguards we use to protect your Personal Information.

5 Your rights in relation to your Personal Information

You have a number of rights with regard to your Personal Information. You have the right to request from us access to and correction of your Personal Information. If you have any concerns or complaints around how Arenite is dealing with your Personal Information, please contact us using the details above. We may ask you to provide your complaint in writing and to provide relevant details. We will aim to respond to your complaint within 30 days. If you are still not satisfied, you have the right to

lodge a complaint with the data protection regulator in your jurisdiction if you believe that we have not complied with the requirements of applicable data protection laws in relation to your Personal Information. In Australia, the regulator is the Office of Australian Information Commissioner (“**OAIC**”).