

CPS Employment Privacy Policy

Date: 30 October 2019

Club Plus Superannuation Pty Ltd
ABN 26 003 217 990
AFS Licence No. 245362
RSE Licence No. L0000529
(Trustee)

As trustee for

Club Plus Superannuation Scheme
ABN 95 275 115 088
RSE Registration No. R1000757
(Fund)

Control Sheet

Policy	CPS Employment Privacy Policy
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Entity	Club Plus Superannuation Pty Ltd as employer APP entity
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Approved by	Board
Review requirement	As required

Modifications

Authority to approve modifications

Version	Revision Date	Brief description of modification	Drafted by
1	October 2019	New Policy	Compliance Manager

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1. Your Privacy

Club Plus Superannuation Pty Limited (“we”, “us”, “our” or “CPS”) is required to comply with the Australian Privacy Principles (APP’s) contained in the Privacy Act 1988 (“Privacy Act”) in relation to Personal Information about prospective employee applicants.

The privacy of your information matters to us and this Privacy Policy (“Policy”) details how we handle your personal (including sensitive) information in accordance with the APP’s.

The Policy has been developed to inform you of your rights and our obligations, including how we collect, hold, use and disclose your Personal Information. It was last updated 30 October 2019 and may change from time to time. You can access an up-to-date copy on our website <https://www.clubplussuper.com.au/about-us/cps-information/careers/> or contact us to request a hard copy free of charge.

2. What do ‘Personal Information’ and ‘Sensitive Information’ mean?

‘Personal Information’ is information or an opinion (whether it is true or not) about an identified individual, or an individual who is reasonably identifiable.

Personal Information includes Sensitive Information. ‘Sensitive Information’ is information or an opinion about a person’s health as well their personal attributes such as racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, genetic or biometric information.

3. Personal Information We Collect

If you apply for a position with CPS, we will collect your Personal Information such as your name, contact details and your employment history during the recruitment process.

This information may be collected directly from you or from recruiters, your previous employers or referees you advise to us.

4. Purposes for Which We Collect, Hold and Use Personal Information

The purpose of collecting, holding and using your Personal Information is so that we can assess your suitability for the position you have applied for or as an employee of CPS in any other capacity.

Unless you have agreed, we will only collect, hold and use your Personal Information for:

- the purpose for which it was given to us; and
- related purposes which you would reasonably expect.

5. How We Collect Personal Information

Collection of Personal Information

We will only collect Personal Information by lawful and fair means.

Personal Information will generally be collected from you and will typically come from what you have provided in your application, resume and cover letter. We may also collect Personal Information from recruiters, your previous employer and public websites.

The means by which we may collect Personal Information include email, phone, websites, interviews and any written material you provide to us.

Your email address will only be used for the purpose for which it was provided, that is, for us to communicate with you about employment with us. It will not be used for any other purpose without your consent.

Collection of Sensitive Information

We will not collect your Sensitive Information without your prior consent, except where we are required or permitted by law to collect your Sensitive Information without your consent.

However, you should be aware that it is a condition of employment to undertake a police check at commencement and every 3 years thereafter.

Unsolicited information

In the event that we receive unsolicited Personal Information (Personal Information about you that we have not requested), and if we determine that we could not have lawfully collected that information under Privacy Act if we were to request it, we will destroy or de-identify this information, if it is both lawful and reasonable to do so.

If we determine that we could have lawfully collected the Personal Information, we will deal with the information as outlined in this policy as if it had solicited the information.

6. How We Hold and Protect Your Personal Information

Your Personal Information may be held by us in paper-based or electronic files. We will take all reasonable steps to ensure that your Personal Information is protected from:

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

With respect to paper-based information, we have physical security controls at our premises and in respect of electronic files, we have secure electronic networks.

Access to your Personal Information is restricted to our People and Culture Officer and staff who will be interviewing candidates for a position . A system of passwords and different levels of access is used to protect the information held on our systems.

7. Breaches Affecting Personal Information

Notwithstanding the security measures above, we have procedures in place if your Personal Information is accessed or disclosed without authorisation or is lost. This may include notifying you and the Office of the Australian Information Commissioner (known as the Privacy Commissioner).

8. Disclosure of Your Personal Information

We may disclose your Personal Information to referees, recruiters and employment screening service providers for the purposes of considering your application for employment

Cross Border Disclosure

We will not disclose your Personal Information to overseas recipients.

9. Using our Website

You can use our website to find out general information about the Fund and about careers with Club Plus Super.

When you visit our website www.clubplussuper.com.au, our server attaches a small data file known as a cookie on your hard drive to collect the following information:

- the time and the date that you visited;
- any information or documentation that you have downloaded;
- your browser type; and
- server address.

We may collect this information to assist us in identifying what information is of interest or use to our members. Cookies are safe and cannot be used to pass on a virus.

You may change the settings on your internet browser to reject cookies. However, this may impact on your experience with our website.

Links on our website

Our website may contain links to third party websites. We advise that the terms of this Privacy Policy do not apply to these external websites. If you wish to find out how any third party handles your Personal Information, you will need to obtain a copy of their privacy policy.

10. Destruction of Information

If you are not offered a position at Club Plus Super, our current policy is to destroy all documents containing Personal Information about unsuccessful candidates at the time the position is filled.

11. Your Rights

Anonymity

You have the option of not identifying yourself, or of using a pseudonym, when dealing with us as follows:

- when you browse our website we do not collect your Personal Information; and
- you can make a general inquiry about employment with us without providing your personal details.

The option of remaining anonymous is very limited. If you wish to apply for a position with us, but refuse to provide identifying information, we may not be able to assess your suitability as an employee.

Right to refuse

You also have the right to refuse to provide us with Personal Information if we request it. However, if you choose to do so, we may not be able to assess your suitability as an employee.

12. Accessing and Correcting Your Personal Information

You have the right to access your own Personal Information that is held by us, and if this information is incorrect, request that we correct this information.

We will not generally charge you for the making of the request, for correcting the Personal Information or for associating a statement with the Personal Information, however we reserve the right to recover reasonable costs in relation to requests to access Personal Information.

Accessing your Personal Information

You may also access your Personal Information by contacting our People and Culture Officer by phone or email writing and request that we provide you with this information. You will be required to provide acceptable proof of your identity before we will be able to provide you with access to ensure your Personal Information is protected.

We will provide access to the information fairly and efficiently, in the manner you request if it is reasonable and practicable to do so and within a reasonable timeframe that will be agreed with you which will not be more than 30 days from your request.

Refusing access

Exceptional circumstances may arise which prevent us from providing you with access to your Personal Information. In these cases, we will advise you in writing why we cannot provide you with the information and mechanisms available to you should you want to lodge a complaint.

If we refuse to give access in the manner you request, we will take such steps as reasonable to give access in a way that meets the needs of us and you. This may include access being given through the use of a mutually agreed intermediary.

Correcting your Personal Information

We take reasonable steps to make sure the Personal Information collected, used or disclosed is accurate, up-to-date, complete and relevant. Where we believe that the Personal Information held is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information within a reasonable time.

If you believe the Personal Information we hold about you is incorrect, you may also notify us of this by using the contact details above. If the information is confirmed to be incorrect, we will correct it as quickly as possible and provide a confirmation to you that the correction has been made.

If we have previously disclosed Personal Information about you to another entity and it is corrected, we will advise the other entity of the correction if you request us to do so unless it is impracticable or unlawful to do so.

Refusing to correct Personal Information

In the exceptional circumstances we have received a request to correct your Personal Information but are unable to implement the correction you have requested, we will advise you in writing of the reasons for not making the correction you have requested and mechanisms available should you wish to lodge a complaint.

13. Inquiries and Complaints

We take the privacy of your information seriously and have a Privacy Officer who is responsible for the implementation of this Privacy Policy. You may contact the Privacy Officer:

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- if you have any questions, concerns or complaints about this Privacy Policy, or our use of your Personal Information;
 - if you wish to access your Personal Information; or
 - if you believe that the privacy of your Personal Information has been compromised or is not adequately protected.

Once a complaint has been lodged, the Privacy Officer will respond to you within 30 days to address your complaint.

The Contact Details for our Privacy Officer are:

Phone (02) 9376 9400
Email privacy@clubplussuper.com.au
Fax (02) 9231 6955
Postal Privacy Officer
Club Plus Super
GPO Box 3774
SYDNEY NSW 2001

If you are dissatisfied with the response from the Privacy Officer, you may also lodge a complaint with the Office of the Australian Information Commissioner to the following details:

Online: <http://www.oaic.gov.au/privacy/privacy-complaints>
By email: enquiries@oaic.gov.au
By phone: 1300 363 992
By post: GPO Box 5218 Sydney NSW 2001

14. Access to the CPS Employment Privacy Policy

The current version of this Policy will be available on our website at <https://www.clubplussuper.com.au/about-us/cps-information/careers/>

This Policy is available free of charge. You may request a printed version of this Policy by contacting the Member Hotline on 1800 680 627, emailing us on member@clubplussuper.com.au, web chat at clubplussuper.com.au or by mail to GPO Box 3774 Sydney NSW 2001.