



Flare HR Privacy Policy

Last updated 24 May 2016

In this Privacy Policy, **us, we** or **our** means Flare HR Pty Ltd (ABN 46 607 120 892) and our related bodies corporate. We own and operate the Flare HR management platform (**platform**).

We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose your personal information. We are bound by the Australian Privacy Principles contained in the Privacy Act.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with our Platform Terms of Use, Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on the platform (available at www.flarehr.com/legal). By continuing to use and access our platform, you agree to these changes. We encourage you to check the platform periodically to ensure that you are aware of our current Privacy Policy.

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details. It may also include financial information, including your credit card information.

This Privacy Policy explains how we manage your personal information, including:

- what personal information we collect;
- why we collect, hold, use or disclose personal information;
- whether we use your personal information for direct marketing;
- to whom we disclose your personal information;
- how we collect, store, use and disclose Government Related Identifiers;
- whether we disclose your personal information outside of Australia;
- how we collect personal information when you use or access the platform;
- how we keep your personal information secure;
- how we manage third party links on the platform; and
- how you can make a complaint or contact us for further information.

1 What personal information do we collect?

We only collect personal information for purposes which are directly related to our services, functions or activities, and only when it is necessary for, or directly related to these purposes. If you do not provide this information, we may not be able to provide some or all of our services to you and you may not be able to access the platform.

When your employer registers you as a user of our platform, we will collect the following types of personal information from your employer: your name, address, email address, and position title.

We will then provide you with login credentials in order for you to access the platform. When you access the platform for the first time, you will be asked to agree to our Platform Terms of Use. After you have agreed to these terms, we may collect the following types of personal information:

- identification information, including, age or date of birth, gender, tax file number;
- photographs to use as your profile picture on the platform;



- other identity verification information, including driver's licence number, copy of driver's licence or copies of other identification documents;
- contact information, including mailing or street address, email address, telephone number and other contact details;
- information about your personal circumstances, including your marital status and dependants;
- preferences you have submitted, including preferred user name and other preference related to the preference settings for your use of the platform;
- employment information, including current and past position title and qualifications, employment contracts and other agreements, employment benefits and entitlements such as salary information and leave entitlements, information about superannuation benefits and policies, resume details, training data, performance metrics, information about your employer and your relationship with your employer, information about your union memberships;
- financial information, including bank details, credit card information or other information about your financial circumstances;
- information related to any products and services you enquire about or select via the platform;
- comments you make on the platform, information you provide to us through customer surveys, and any additional information relating to you that you provide to us directly or indirectly through the platform or to our representatives;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries; or
- any other personal information that may be required in order to facilitate your dealings with us.

We may also collect sensitive information such your health or criminal records. We will only collect this information when it is necessary for, or directly related to our services, functions or activities, and you have provided us with your consent.

We may collect these types of personal information either directly from you, or from third parties. We may collect this information:

- from your employer or persons that your employer nominates to administer your employer's human resources functions in relation to the platform;
- when you register and activate your account on the platform;
- when you communicate with us through correspondence, chats, email or phone calls;
- when you interact with our platform, websites, services, content and advertising;
- from our business partners, including third party suppliers and service providers; or
- when you invest in our business or enquire as to a potential purchase in our business.

In addition, when you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This



Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

2 Why do we collect, hold, use and disclose personal information?

We may collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use the platform and our services;
- to contact and communicate with you;
- to enable your employer, and its nominated personnel to administer your employer's human resources functions;
- to provide you with information about our products and services and the products and services of our business partners;
- to operate, protect, improve and optimise the platform, and our services, business and users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our carefully selected and trusted business partners that we think you may find interesting and this includes direct marketing;
- to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- to consider your employment application.

We may use or disclose information about you in order to combine the information that we hold about you with information about you collected from or held by other trusted partners or from public sources. We do this in order to enable the development of consumer insights about you so that we and those other trusted companies can serve you better. This includes being able to better understand your preferences and interests, personalise your experience, enhance the products and services you receive, and to tell you about products and services. We may also use trusted service providers to undertake the process of creating these consumer insights.

In order to improve our products and services, we also collect data about how users interact with our platform and related services, the characteristics of our user base and other data derived from the data we collect from or about our users. We may use or disclose such data to a third party, but we will only do this where we have processed this data into a format such that you will not be able to be identified.

3 Do we use your personal information for direct marketing?

Making available carefully selected products and services on or via the platform for you to view and potentially acquire is an integral part of our service and the Flare Platform. We may use and disclose your personal information to offer you, and to enable our related companies and other trusted business partners to offer you, products and services that we believe may interest you. We may also disclose your personal information to other companies who assist us to market our products and services.

If you do not want to receive marketing offers by email or in hard copy, please opt out by adjusting your account settings or using the opt-out facilities provided (eg an unsubscribe link), or contact us using the details set out below.



We will only use or disclose sensitive information about you for the purpose of direct marketing if you have consented to the use or disclosure of the information for that purpose.

4 To whom do we disclose your personal information?

We may disclose personal information for the purposes described in this privacy policy to:

- our employees and related bodies corporate;
- your employer;
- third party suppliers and service providers (including information technology suppliers, communication suppliers and our business partners which may include superannuation funds and health funds);
- the platform and/or our business or in connection with providing our products and services to you);
- professional advisers, dealers and agents;
- payment systems operators (including merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- our sponsors or promoters of any competition that we conduct via our services;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

5 Disclosure of Government Related Identifiers

Government Related Identifiers (including tax file numbers) are defined in the Privacy Act, and include tax file numbers. We are required to comply with laws relating to the collection, storage, use and disclosure of Government Related Identifiers.

We may collect and hold Government Related Identifiers, such as your tax file number, as an agent for your employer. We will not disclose any Government Related Identifiers other than at the direction of your employer or as required or permitted by law.

6 Disclosure of personal information outside Australia

We will not disclose personal information outside of Australia.

7 Using the platform and cookies

We may collect personal information about you when you use and access the platform.

While we do not use browsing information to identify you personally, we may record certain information about your use of the platform, such as which parts of the platform you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on the platform that help us track your use of the platform and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but the platform may not work as intended for you if you do so.



We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

8 Security

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. All data is hosted physically in Australia in Microsoft Azure. Access to the hosting platform and production database is tightly controlled, with limited access to security credentials. We endeavour to apply best practice in our security measures, however, we cannot guarantee the security of your personal information.

9 Links

The platform may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

10 Accessing or correcting your personal information

You can access the personal information we hold about you by contacting us using the contact details below. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.

If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

11 Making a complaint

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the contact details below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

12 Contact Us

For further information about our Privacy Policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

Privacy Information Officer
Flare HR
c/- UHY Haines Norton
Level 11
1 York Street
Sydney NSW 2000
info@FlareHR.com; (02) 9114 9907