



## Privacy Policy

### 1. Purpose

1.1 Salt Medical Recruitment Pty Ltd (Salt Medical) is committed to protecting your privacy and the personal information. We will only collect information that is reasonably necessary for the proper performance of our activities or functions as a recruitment agency.

1.2 Personal information is collected and managed in accordance with applicable privacy laws, such as:

- 1.1.1 the Privacy Act 1988 (AU);
- 1.1.2 the Privacy Act 2020 (NZ); and
- 1.1.3 the General Data Protection Regulation (EU).

1.3 This Salt Medical Recruitment Privacy Policy (Policy) outlines how Salt Medical Recruitment collects, discloses, uses, stores, or handles your personal information.

1.4 "Personal information" means information about an identifiable individual. Personal information includes 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.

### 2. Scope

2.1 Salt Medical Recruitment provides recruitment services matching doctors to clients in the healthcare markets of Australia and New Zealand. This Policy relates to personal information collected by Salt Medical Recruitment.

### 3. Privacy Officer

3.1 For any queries, requests or complaints relating to your personal information please contact Salt Medical's Privacy Officer at:

Email: [recruitment@saltmedics.com](mailto:recruitment@saltmedics.com)

Phone: + 61 2 4967 1947

### 4. Consent

4.1 By submitting your personal information to Salt Medical Recruitment, you consent to Salt Medical Recruitment dealing with your personal information in accordance with this Policy. In addition, if applicable law requires your specific consent to deal with personal information, you will be asked to give



that consent. Your personal information will be used, stored, disclosed, and treated according to this Policy.

## **5. Collection of personal information**

5.1 It is Salt Medical Recruitment' usual practice to collect personal information directly from you. If you do not provide information, or the information provided is insufficient or inaccurate, this may limit the scope of services that Salt Medical Recruitment can provide to you.

5.1 Collection may occur when you provide information to us through our website, Salt Medical social media groups or when you fill in and submit one of our application forms via email or telecommunications systems.

5.3 We also collect personal information that has been provided to us through an external third party, or a publicly available source. Salt Medical Recruitment will take reasonable steps, where practicable, to inform you that we have collected personal information from a third party.

5.4 The type of personal information we collect will depend on various factors such as the type of service provided to you and the applicable legal and regulatory obligations. This may include collection of the following kinds of information:

- Correspondence records including by email, phone, post or personal information, comments, and feedback that individuals choose to give us via our website.
- Contact information that allows us to communicate with you via e-mail, postal address, telephone number, social media platforms (i.e., LinkedIn, Facebook, Instagram) or via comments made on our website. We may use this information to provide services, for marketing purposes, or to contact you for further information or feedback.
- Professional information to help us to understand your employment history, professional skills, and qualifications. This includes requesting and reviewing a copy of your curriculum vitae, references, qualification documents, criminal history, immunisation records
- Identity information that allows us to identify you. This includes driver's licence, passport, visa, birth certificate, proof of address details and government issued identification cards.
- Web search information that allows us to assess your suitability for a position such as background checking via Google, regulatory sites, medical registrations boards and electronic identity verification databases.
- Financial information that allows us to pay you should you be engaged by one or more of our clients. This may include time sheets, tax invoices, bank details, tax file number, ABN / ACN, GST and superannuation payment details.



- If you provide us with information about other individuals, then you are responsible for notifying that individual of this disclosure of their personal information. Other individual may include previous employers, referees and referred candidates or clients. As per this Policy information about other individuals will be treated with the same applicable legal and regularly obligations.
- Immigration information that allows us to verify that you are legally permitted to work in Australia or New Zealand. This may include evidence of citizenship, permanent residency, visa, or work permit documents).

## **6. Use of Personal Information**

6.1 Salt Medical Recruitment will only use your personal information in accordance with applicable privacy laws.

6.2 Salt Medical Recruitment collects your personal information for the purposes of:

- Providing you with Salt Medical Recruitment services;
- Verifying your identity, qualifications, eligibility for specific job opportunities;
- Assisting you in finding work and career opportunities;
- Assisting in managing your work performance;
- Assisting you in booking travel & accommodation locum services;
- Paying you should you be engaged as an employee or contractor;
- Directly marketing our services to you (you have a right to opt-out from receiving direct marketing). Any opinions you provide to us such as testimonials may be passed onto a third party for the purposes of creating marketing material. We will ask your consent before passing this information onto the third party;
- Managing risk and to ensure compliance with work health and safety legislation ;
- Protecting and/or enforcing our legal rights and interests, including defending any claim;

6.3 Salt Medical Recruitment may use personal information for direct marketing purposes as follows:

6.3.1 If you are an Australian and New Zealand citizen, you acknowledge your personal information may be used for the purpose of direct marketing to the extent permitted by applicable law. If you are a European Union citizen, your personal information may be used for the purpose of direct marketing where consent is given to do so.

6.3.2 We market using a variety of methods including email, phone, and SMS. We may use information collected from you from our Social Media Groups on LinkedIn, Facebook or Instagram to directly market the services of Salt Medical Recruitment.

6.3.3 If you do not wish to have your personal information used for direct marketing purposes, you may contact our Privacy Officer and request not to receive direct marketing communications. Your marketing preferences will be updated on our systems.

## **7. Information collected on our website**



7.1 It is important to note that there are inherent risks in transmitting information across the internet. The internet is an open system and Salt Medical Recruitment cannot guarantee that the personal information you submit will not be intercepted by others. Our website may have links to external websites operated by other organisations such as charities that we support. We cannot guarantee the content or privacy practices of external websites and do not accept responsibility for those websites.

7.2 When you access our website, our web hosting provider may make a record of the visit and log the following information for statistical purposes:

- Your IP address;
- The pages viewed;
- The date and time of visits to our website;
- Technical information on browser connections.
- The referring site (if any) through which you clicked through to this website;

7.3 This statistical information is anonymous and no attempt is made to identify users or their individual browsing activities. An exception is in the event of an investigation, where a law enforcement agency may exercise a warrant to inspect a web hosting provider's server logs.

## **8. Cookies**

8.1 We use cookies to monitor usage of our website.

8.2 Cookies enable activities such as, retaining registration details, work preferences, logins, usernames, and search queries. If you do not wish to retain information about your visit you can delete the cookies in your browser and change the settings in your web browser.

## **9. Disclosure of personal information**

9.1 Salt Medical Recruitment will only disclose your personal information in accordance with the applicable privacy laws.

9.2 Salt Medical Recruitment may disclose your personal information for the purpose it was collected as set out in this Policy, and as otherwise permitted by applicable privacy law. Accordingly, Salt Medical Recruitment may disclose your personal information to other parties (located locally and/or overseas), including:

- Your nominated referees.
- Any educational or vocational organisation to the extent necessary to verify your qualifications.
- Clients who may wish to engage your services.
- Prospective employers. This may involve disclosing all relevant personal and professional information that Salt Medical Recruitment holds including personal information, previous employment engagements, performance records, complaints, and disciplinary matters.



- Any government authority in accordance with applicable law and law enforcement body, including the police.
- Salt Medical Recruitment suppliers or service providers. This includes any organisation that supports Salt Medical Recruitment's business functions and operations for example hosting, IT system providers, direct marketing and payrolling companies.

9.3 We will endeavour to take reasonable steps to ensure that personal information disclosed to any third parties is protected in the same way that Salt Medical Recruitment protects your information.

9.4 Salt Medical Recruitment stores personal information overseas in connection with the operation of our business and provision of our services. Salt Medical Recruitment uses cloud service providers for Website hosting, CRM, and Record Management. The countries in which your personal information may be stored may include Australia and New Zealand and other countries such as the United Kingdom.

9.5 Salt Medical Recruitment may disclose personal information where required to do so by law, court order, subpoena or other legal process, as requested by a governmental or law enforcement authority.

## **10. Data quality & correction**

10.1 Salt Medical Recruitment takes reasonable steps to ensure that the personal information it collects is accurate and complete.

10.2 Salt Medical will take reasonable steps to update and correct information in accordance with applicable privacy laws. We may also contact you from time to time to check the information is correct and up to date.

10.3 You have the right to request a correction to any of your personal information that Salt Medical Recruitment holds, subject to certain grounds for refusal as set out in the relevant privacy laws.

10.4 If we have disclosed personal information about you that is inaccurate you can ask us to notify third parties to whom we made the disclosure. Reasonable steps will be taken to notify the third party unless it is impracticable or unlawful to do so.

10.5 Salt Medical Recruitment will respond to your request for correction within 30 working days. If we do not agree the information should be changed and refuse to correct your personal information you may make a complaint.

## **11. Access to personal information**

11.1 You have the right to request access to your personal information held about you by Salt Medical Recruitment.



11.2 If you wish to obtain access to your personal information you should contact our Privacy Officer. You will need to verify your identity. We may charge you for reasonable costs of providing copies of your personal information.

11.3 We may refuse to provide you with access in certain circumstances permitted by applicable law. One important circumstance is where evaluative material is obtained confidentially during reference checks. We may refuse access if it would breach confidentiality or if it would interfere with the privacy of others.

11.4 Salt Medical Recruitment will respond to your request for access within 30 working days. If we refuse access to personal information or to give access in the manner requested, you may make a complaint.

11.5 European Union citizens have the right to “data portability”. If this right applies to you: (i) you may receive your personal data in a structured, commonly used and readable format; and (ii) you have the right to transmit that data to another data controller where technically feasible and where it does not infringe on the rights of another individual.

## **12. Data storage & security**

12.1 Your information is stored on a secure database and cloud-based storage and restricted user access. Salt Medical Recruitment takes reasonable steps to protect the personal information we hold from loss, unauthorized access and misuse.

12.2 In order to perform data storage and data processing services Salt Medical Recruitment may provide your personal information to contracted third/ All reasonable steps will be taken to ensure that all third parties comply with Salt Medical Recruitment’s Policies and will not use your personal information for any other purpose.

12.3 While Salt Medical Recruitment takes reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk. Salt Medical Recruitment makes no warranty (express or implied) in respect of data transferred over the internet. You acknowledge that the security of any personal information collected via the internet is not guaranteed.

## **13. Retention and Disposal**

13.1 We will retain your personal information for only as long as it is required for the purposes for which it may lawfully be used. In addition, if applicable law requires us to cease holding your personal information when you withdraw consent, we will cease retaining it after you withdraw your consent. You can withdraw your consent at any time by contacting the Privacy Officer.



13.2 If we are unable to dispose of or delete personal information then it will either be encrypted for protection or undergo a de-identification process, to disassociate personal information from other data stored by us.

13.3 You acknowledge that we may have lawful purposes for retaining employee records, immunization records, complaints for a period continuing beyond the time during which you are actively engaged as a candidate, client, or employee with or by Salt Medical Recruitment.

13.4 European Union citizens have the “right to be forgotten”. If you are a European citizen, you may request the deletion of any of your personal or sensitive information. We will deal with such requests in accordance with applicable law

## **15. Data Breaches**

15.1 In the event that personal information has been lost or subject to unauthorised access, misuse, interference, or disclosure, we will take all necessary steps to contain and rectify the data breach, as soon as practicable, and prevent reoccurrence.

15.2 Where the privacy breach is likely to result in serious harm, we will take reasonable steps to notify you and provide you with relevant information in relation to the breach, as required by applicable law. As soon as practicable, and to the extent we reasonably consider we are required or permitted to by applicable law, we will also contact and prepare a statement for the Information Commissioner (AU) or the Privacy Commissioner (NZ) detailing the breach and the steps taken. A review of the incident will be completed, and action taken to reduce the likelihood of future breaches.

15.3 Where you are a European Union citizen and the data breach relates to your personal information, we will notify the applicable supervisory authority and notify you if there is a high risk to your personal rights and freedoms.

## **16. Complaint’s procedure**

17.1 You may make a complaint about our handling of your personal information if you believe that we have interfered with your privacy. Complaints should be made to our Privacy Officer in writing.

17.2 When we receive your complaint, we will take steps to confirm the authenticity of the complaint and the contact details of the complainant. Upon confirmation, we will:

- send a written acknowledgment confirming receipt of your complaint;
- investigate the complaint in more detail. This may include asking for further details and clarification of certain aspects of the complaint.

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## MEDICAL RECRUITMENT

- require a reasonable time to respond, particularly where further information, processing, assessment, consultation, or investigation is required;
- suggest possible solutions if the complaint can be resolved through access or correction;
- will suggest a solution, on a confidential and without prejudice basis, if we believe that your complaint may be capable of some other solution.

17.3 If the complaint cannot be resolved, you may take your complaint to a recognised external dispute resolution provider such as the Office of the Australian Information Commissioner (Australian citizens), or the New Zealand Privacy Commissioner (New Zealand citizens) or in the case of European Union citizens, with a supervisory authority in the Member State of your habitual residence.

### **17. Changes**

16.1 From time to time, we may change this Policy. If we change this Policy, we will provide an updated copy of this Policy on our website. Your continued use of our services, or continued engagement with us, constitutes your acceptance of the changed Policy and that any personal information collected or held by us will be subject to the changed Policy.

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