

# VGW Candidate Privacy Policy

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At VGW, we are committed to protecting and respecting your privacy and maintaining the confidence and trust of our customers. This privacy policy ("Privacy Policy") explains how your personal information is collected, why it is collected and how it is kept secure. We are committed to complying with obligations under all applicable global data privacy laws, including the General Data Protection Regulation ('GDPR'), the California Consumer Privacy Act ('CCPA'), the Virginia Consumer Data Protection Act ('VCDPA'), the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA) (and any provincial substantially similar law as applicable) and the Australian Privacy Act 1988 (Cth) (the 'Privacy Act') (including the Australian Privacy Principles set out in the Privacy Act (the 'APPs')).

This Privacy Policy is issued on behalf of the VGW Group so when we mention "**VGW**", "**we**", "**us**" or "**our**" in this Privacy Policy, we are referring to the relevant company in the VGW Group responsible for processing your information. VGW Holdings Limited is the ultimate parent company of the group of entities referred to as the "**VGW Group**".

## 1. Data Controller

1.1 The data controller responsible for processing data collected through your application for an employed position within the VGW Group or use of the Website or otherwise any interaction with VGW Holdings Limited is VGW Holdings Limited, having its registered address at Level 11, 15 – 17 William Street, Perth 6000, Western Australia (the "Data Controller").

## **2. Types of Information We Collect**

2.1 Personal information is any information about you, whether it is true or not, where your identity is apparent or can reasonably be ascertained from that information. When anonymous information is directly or indirectly associated with personal information, the resulting information is also treated as Personal Information. Anonymous information means information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual. Aggregate information means information about groups or categories of customers, which does not identify and cannot reasonably be used to identify an individual customer.

2.2 We two basic types of information – Personal Information and anonymous information (as defined above at clause 2.1) – and we may use personal and anonymous information to create a third type of information, aggregate information (also defined at clause 2.1). We collect:

- a) Contact information such as your full name, email address, home address and telephone number.
- b) Personal information such as gender, age, age range or your image.
- c) Professional history and qualifications such as your previous employers, positions and work experience, professional licenses, certificates and qualifications, and employment references or referrals.
- d) Educational history and qualifications such as your highest level of education, degrees, certificates or other education qualifications.
- e) Financial Information such as your desired salary, benefits, and expenses. You may volunteer your previous salary and/or financial package.
- f) Background check information, when permitted by law, we may choose to conduct a background check in connection with your application to verify professional history and qualifications or identify criminal history that may be relevant for a position with us. The results of these checks may include personal information we do not already have about you.
- g) Other application and interview information such as any personal information you choose to share with us in your interview or application, CV, resume, or other supporting documentation or help us coordinate requirements for an interview.

## **3. How We Collect Your Information**

3.1 Personal information is usually collected directly from you through conversations in person, over the phone, or via email (including when you send us your application documents such as resume or cover letter). We may also collect certain information from references, recruiters, job-related social media sites (such as LinkedIn), and publicly available sources. In addition, we may also collect this information through service providers and other third parties that collect it on our behalf, such as communications providers, scheduling providers and application providers.

## **4. How We Use Collected Information**

4.1 In accordance with applicable laws and any elections made available to you, VGW may collect and use your information for the following specific purposes:

- a) identifying you as a potential candidate and reviewing your application for a position with us;
- b) verifying the information provided to us in connection with your application;

- c) determining eligibility for initial employment, including the verification of references and qualifications and adhering to legal obligations including but not limited to anti-money laundering legislative requirements;
- d) facilitating the recruiting and interviewing process;
- e) communicating the status of your application;
- f) fulfilling contractual obligations to you in the event you become an employee of VGW;
- g) complying with applicable laws, rules, regulations, legal proceedings and government investigations, including relating to tax and immigration reporting/purposes; and/or
- h) such other purposes as are reasonably required by VGW.

4.2 In the case of external contractors, the information collected may be disclosed or used in connection with performing services for VGW under the relevant contract (i.e. for granting access, organising work, payment for services, internal reporting).

4.3 If you complete an application form or provide us with your resume or provide any personal information by email, in paper or in person, we will treat it as explicit consent to our use of your personal information as per this Privacy Policy.

#### **4.4 Legal Basis for Collection and Use of Personal Information (GDPR)**

With regards to the above purposes, we may collect, use and disclose your information per the following legal basis:

- a) to perform our contractual obligations – such as obtaining professional, financial, technical, administrative or other advice and services in connection with our services;
- b) to comply with applicable GDPR and other EU legal obligations;
- c) for our legitimate interests – such as to investigate breaches of this Privacy Policy, to protect our rights and property (e.g. in the context of a corporate transaction), to enforce our terms and conditions and legal notices, and for the establishment, exercise and defence of legal claims; and
- d) on the basis of your consent – which you may give from time to time (e.g. for the use of certain cookies) with the possibility to withdraw your consent at any time.

## **5. How We Protect Your Information**

5.1 We have in place physical, electronic and operational procedures to protect the information that we collect.

5.2 We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored in our environment.

5.3 Our security measures are reviewed regularly and updated in keeping with technological advances.

5.4 We use reasonable means to prevent your personal information from misuse, interference, or loss, as well as any unauthorised access, modification or disclosure.

5.5 If we believe that a notifiable data breach has occurred, we will comply with the legislative requirements to notify you of the data breach and any steps taken by VGW to contain and investigate the data breach.

## **6. How Long Will We Retain Your Information**

6.1 We will retain your information for a reasonable period of time that is necessary to fulfill the authorised purposes outlined in this Privacy Policy unless a longer retention period is required by law.

6.2 If your application is successful and you become an employee, where permitted by law your personal information may be transferred to your personnel file and stored in accordance with our Employee Privacy Policy which you will receive upon commencement with us.

6.3 If your application is not successful, unless notified by you, we may also keep your personal information for the purpose of considering your application for employment for other positions within the VGW Group.

6.4 If we hold personal information about you and we no longer need this information for any purpose, and it is not required by legislation to have it contained in a record, we will take reasonable steps to either destroy or de-identify that personal information.

## **7. Sharing Your Information**

7.1 We do not sell, trade, or rent Candidate personal information to others. From time to time, we may utilize the services of third parties (including companies within VGW Group) in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us. Where this is the case, we will take reasonable steps to ensure that they have demonstrated that they have the right to disclose your personal information to us.

7.2 Your personal information may also be disclosed for:

- a) provisioning human resources management;
- b) provisioning VGW Group IT infrastructure;
- c) processing of salary and benefits payments;
- d) coordinating travel accommodation for our candidates;
- e) conducting background checks; and
- f) provisioning of professional recruitment and talent management services.

7.3 The VGW Group operates in several international jurisdictions and personal information we collect may be transferred to, and stored and processed by, individual companies in the VGW Group or third parties in the European Union, the United States, Canada, Australia, the Philippines or any other country in which we or our service providers maintain facilities. We will ensure that transfers of personal information to any country or organization are subject to appropriate safeguards. Additionally, when transferring personal information from the European Union, we may use standard contractual clauses approved by the European Commission or otherwise adopt other means in accordance with European data protection laws for ensuring adequate safeguards.

## **8. Exercising Your Privacy Rights**

8.1 We appreciate that by law and subject to certain conditions, you have a number of rights concerning the personal information we hold about you. These rights include the right to:

- a) access the personal information we hold about you;
- b) object to the processing of your data;
- c) update and correct the information we hold about you; and

- d) withdraw any consent provided. In some circumstances, you can ask us to delete the personal information we hold about you.

8.2 To exercise the rights described above please complete the [VGW Access Request Form](#) or alternatively email [dataprivacy@vgw.co](mailto:dataprivacy@vgw.co).

8.3 We will not discriminate against you (e.g., your employment application will not be hindered) for exercising any of the rights afforded to you.

8.4 If you would like to use an agent authorized in accordance with applicable laws to exercise your rights, we may request evidence that you have provided such agent with a power of attorney or that the agent otherwise has valid written authority to exercise those rights on your behalf.

8.5 You also have the right to complain to the relevant data protection supervisory authority about our processing of your personal information. Please complete the [VGW Access Request Form](#) or alternatively email [dataprivacy@vgw.co](mailto:dataprivacy@vgw.co).

## 9. Revisions to the Policy

9.1 This Privacy Policy may be updated from time to time to reflect changes in the way we work or the way our work is regulated. We will notify you of material changes and, where required by law, will obtain your consent. Notice may be by the posting of such changes on our Website or by other means in accordance with applicable law.

9.2 Any changes to the Privacy Policy will become effective when the updated policy is posted on our Website.

9.3 We encourage you to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect.

9.4 This Privacy Policy, in effect as of the last modified date listed below, supersedes and replaces any and all Privacy Policies previously in effect.

## 10. Questions

If you have specific questions regarding your personal information or how we use it, please contact our Data Protection Officer directly by email at [dataprivacy@vgw.co](mailto:dataprivacy@vgw.co) or alternatively please complete the [VGW Access Request Form](#).

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