

Privacy Policy

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PRIVACY POLICY

Refugee Talent Pty Ltd (ACN 610 400 078) of Level 4, 155 Queen St, Brisbane, QLD 4000 (“we”, “us” or “our”) and our operation of the websites at <https://refugeetalent.com> and <https://wavexd.com> (together, the “Websites”) is committed to respecting your privacy and respecting and upholding your rights under the Australian Privacy Principles (“APPs”) contained in the Privacy Act 1988 (Cth) and the General Data Protection Regulation (EU 2016/679) (the “GDPR”) (collectively, “Privacy Laws”). We are a data controller for the purposes of the GDPR. We ensure that we will take all necessary and reasonable steps to comply with the relevant Privacy Laws and to deal with inquiries or complaints from individuals about compliance with the relevant Privacy Laws.

This privacy policy sets out how we collect, use, process, store, share and disclose your Personal Information on our Websites (“Privacy Policy”). You can contact us at info@refugeetalent.com.

By accessing and using our Websites, products and services, you freely and expressly consent to the collection, use, processing, storage and disclosure of Personal Information by us as set out in this Privacy Policy.

1. Your Personal Information

We will collect personal information only by lawful and fair means and not in an unreasonably intrusive way.

Personal information is any information relating to an identified or identifiable natural person (“Personal Information”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Generally, we will collect Personal Information directly from you, and only to the extent necessary to provide our services requested or ordered by you and to carry out our administrative functions or as required by a relevant Privacy Law.

We may also collect Personal Information from you when you communicate with us, visit our Websites, register a profile or set up an account, provide us with feedback, complete online surveys or participate in competitions.

We may collect Personal Information about you that you have provided to our business partners or from third parties and in respect of which you have given the third party permission to share with us.

If you use a pseudonym when dealing with us or you do not provide identifiable information to us, we may not be able to provide you with any or all of our services as requested. If you wish to remain anonymous when you use our Websites, do not sign into it or provide any information that might identify you.

We require individuals to provide accurate, up to date and complete Personal Information at the time it is collected.

2. Your Sensitive Personal Information

Personal information may also include “sensitive information”. Sensitive information is information or an opinion about an individual that is highly sensitive or has a heightened importance for the individual, and often can relate to an individual’s racial or ethnic origin, criminal background, health,

genetic or biometric information. The only sensitive personal information we collect from you will be country of origin, criminal background and sexual orientation.

We will only collect Sensitive information directly from you when you complete your profile on our platform licensed by one of our customers, and only to the extent necessary to provide our services requested by you and to carry out our administrative functions or as required by a relevant Privacy Law.

We will collect country of origin, criminal background and sexual orientation Information only by lawful and fair means and not in an unreasonably intrusive way. Any sensitive Information collected from you (as set out above) will only be collected directly from you with your consent.

We ask that you do not send us *any other* sensitive information, or do not disclose, any other sensitive personally identifiable information such as information related to religion or other beliefs, or trade union membership on or through the Websites or otherwise. If, contrary to this request, you do provide any sensitive personal information, in doing so you consent to us collecting and handling that information in accordance with this Privacy Policy.

3. Information about children under 18

Our Website is not intended for users under the age of 18, however minors may use the Platform where they have the consent of a guardian and/or parent. We acknowledge that the definition of a “minor” changes between jurisdictions, however we do not knowingly seek or collect Personal Information from any children below the age of 18 years where they do not have a guardian and/or parental consent.

4. What is our legal basis?

Under the GDPR, we must have a legal basis to process Personal Information collected from individuals residing in the European Union. We rely on several legal bases to process your Personal Information, including:

- where it is necessary to provide you with access to, and use of, products, services and websites;
- for our legitimate interests to provide, operate and improve our products, services or Websites;
- where you have freely and expressly consented to the processing of your Personal Information by us, which you may withdraw at any time; or
- where we are under a legal obligation to process your Personal Information.

5. How your information is used

We use, process and disclose your Personal Information for the purposes for which the information is collected, or for a directly related purpose, including (but not limited to):

- providing our Websites, products and services to you (including communicating with potential employees or employers (as the case may be));
- administering, protecting, improving or optimising our Websites, products and services (including performing data analytics, conducting research and for advertising and marketing purposes);
- creating industry reports from de-identified data;
- verifying your age;

- informing you about our Websites, products, services, surveys, or other promotional activities or events sponsored or managed by us or our business partners;
- responding to any inquiries or comments that you submit to us;
- verifying your identity;
- any other purpose you have consented to; and
- any use which is required or authorised by a relevant Privacy Law.

Where we:

- have your express consent (which you may withdraw at any time by contacting us in writing at info@refugeetalent.com);
- have a legal basis; or
- are otherwise permitted by relevant Privacy Laws,

we may use and process your Personal Information to send you information about products and services we believe are suited to you and your interests or we may invite you to attend special events.

At any time, you may opt out of receiving direct marketing communications from us. Unless you opt out, your consent to receive direct marketing communications from us and to the handling of your Personal Information as detailed above will continue. You can opt out by following the unsubscribe instructions included in the relevant marketing communication, or by contacting us in writing at info@refugeetalent.com.

6. Disclosure of Personal Information

We may disclose your Personal Information to:

- third-parties we ordinarily engage from time to time to perform functions on our behalf for the above purposes;
- any person or entity to whom you have expressly consented to us disclosing your Personal Information to;
- our external business advisors, auditors, lawyers, insurers and financiers; and
- any person or entity to whom we are required or authorised to disclose your Personal Information to in accordance with the relevant Privacy Laws.

If we no longer need your Personal Information for any of the purposes set out in this Privacy Policy, or as otherwise required by the relevant Privacy Laws, we will take such steps as are reasonable in the circumstances to destroy your Personal Information or to de-identify it.

7. Direct marketing

Where we:

- have your express consent (which you may withdraw at any time by contacting us in writing at info@refugeetalent.com);
- have a legal basis; or
- are otherwise permitted by relevant Privacy Laws,

we may use and process your Personal Information to send you information about products and services we believe are suited to you and your interests or we may invite you to attend special events.

At any time, you may opt out of receiving direct marketing communications from us. Unless you opt out, your consent to receive direct marketing communications from us and to the handling of your Personal Information as detailed above will continue. You can opt out by following the unsubscribe instructions included in the relevant marketing communication, or by contacting us in writing at info@refugeetalent.com.

8. Cookies

We use cookies, web beacons and similar technologies (collectively “Cookies”) on our Websites. By accessing or using this Websites, you agree that we can store and access Cookies in accordance with this Privacy Policy.

Cookies are small files that can be stored on and accessed from a user's device when the user accesses a Websites. They enable authorised web servers to recognise you across different websites, services, devices and browsing sessions.

We may use Cookies to enable users to access and use our Websites and Services, including to:

- identify users of our Websites and Services;
- process user requests;
- improve user experience;
- remember user preferences on our Site;
- monitor the use of our Site and for analysis of our user base;
- facilitate communication with users;
- control access to certain content on our Site; and
- protect our Site.

The data collected through Cookies will not be kept for longer than is necessary to fulfil the purposes mentioned above.

We will handle any Personal Information collected by Cookies in the same way that we handle all other Personal Information.

You can delete and refuse to accept browser Cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of the Websites.

Unless you have adjusted your browser setting so that it will refuse Cookies, our system will issue Cookies when you direct your browser to our Websites.

9. Websites

When transmitting Personal Information from your computer to our Websites, you must keep in mind that the transmission of information over the internet is not always completely secure or error-free. Other than liability that cannot lawfully be excluded, we will not be liable in any way in relation to any breach of security or any unintended loss or disclosure of that information.

The Websites may use 'cookies' or other similar tracking technologies that help us track your Websites usage.

10. Data Storage

We may hold your Personal Information in either electronic or hard copy. 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. For example your Personal Information and Sensitive Information is stored using MD5 and SHA1 encryption (and other similar technology), which is fully encrypted at rest. Furthermore, we utilise firewalls to protect all information uploaded to the Website.

However, we cannot guarantee the security of any Personal Information transmitted over the internet and therefore you disclose information and Personal Information to us at your own risk. We will not be liable for any unauthorised access, modification or disclosure, or misuse of your Personal Information.

When entering into a transaction with us you expressly and freely consent to your Personal Information being disclosed or transferred to such Recipients. We will take steps reasonably necessary to ensure your Personal Information is treated securely and in accordance with this Privacy Policy. We use reasonable endeavours to ensure that each Recipient receiving your Personal Information is bound by the relevant Privacy Laws (including the standard contractual clauses approved by the European Commission). The standard contractual clauses are available on the European Commission's Websites at https://ec.europa.eu/info/law/law-topic/data-protection_en.

11. Access to information

Under the GDPR, an individual residing in the European Union has enhanced privacy rights, including the right to:

- require us to correct any Personal Information held about you that is inaccurate or incomplete;
- require the deletion of Personal Information concerning you in certain situations;
- data portability for Personal Information you provide to us;
- object or withdraw your consent at any time to the processing of your Personal Information;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you; or
- otherwise restrict our processing of your Personal Information in certain circumstances.

Subject to some exceptions provided by the relevant Privacy Laws, you may request access to your Personal Information in our customer account database, or seek correction of it, by contacting us. See section 13: Contact information. Should we decline you access to your Personal Information, we will provide a written explanation setting out our reasons for doing so.

We may charge a reasonable fee that is not excessive to cover the charges of retrieving your Personal Information from our customer account database. We will not charge you for making the request.

If you believe that we hold Personal Information about you that is not accurate, complete or up-to-date then you may request that your Personal Information be amended. We will respond to your request to correct your Personal Information within a reasonable timeframe and you will not be charged a fee for correcting your Personal Information.

If we no longer need your Personal Information for any of the purposes set out in this Privacy Policy, or as otherwise required by the relevant Privacy Laws, we will take such steps as are reasonable in the circumstances to destroy your Personal Information or to de-identify it.

12. Third Party Sites

The Websites may contain links to other third party websites including social media networks. This Privacy Policy applies solely to information collected by us on our Websites.

13. Contact information

If you require further information regarding our Privacy Policy or wish to make a privacy complaint, please contact us in writing at info@refugeetalent.com.

14. Notices and Revisions

We reserve the right to modify this Privacy Policy in whole or in part from time to time without notice. Non-material changes and clarifications will take immediate effect, and material changes will take effect 30 days after the posting of the amended Privacy Policy on the Websites.

15. Enforcement

We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personally identifiable information that cannot be resolved between us and the individual