



# Privacy Policy

## Australian Privacy Principles

### 1. Introduction

Inspired Career Planning manages personal information under the [Australian Privacy Principles \(APPs\)](#). This means we must comply with the 13 APPs from Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012, which amends the Privacy Act 1988.

This policy is designed to communicate, in an open and transparent way, how we manage your personal information as an APP Entity under the [Australian Privacy Principles \(APPs\)](#). If you have any questions please [contact us](#).

#### 1.1. Information Flow

Personal information is any information or opinion, whether true or not, about you. When we collect your personal information:

- We check that it is reasonably necessary for our career counselling and career planning functions or activities.
- We check that it is current, complete and accurate. This will sometimes mean that we have to cross check the information that we collect from you with third parties.
- We record and hold your information securely and apply a range of measures to protect your personal information.
- We retrieve your information when we need to use or disclose it for our functions and activities. At that time, we check that it is current, complete, accurate and relevant. This will sometimes mean that we have to cross check the information that we collect from you with third parties once again - especially if some time has passed since we last checked.
- Subject to some exceptions, we permit you to access your personal information in accordance with APP:12 of the [APPs](#).
- We correct or attach associated statements to your personal information in accordance with APP:13 of the [APPs](#).
- We destroy or de-identify your personal information when it is no longer needed for any purpose for which it may be used or disclosed provided that it is lawful for us to do so. We do not destroy or de-identify information that is contained in a [Commonwealth Record](#).

### 2. Types of information that we collect/hold and how this information is collected

Personal information that we collect and hold is information that is reasonably necessary for the proper performance of our career planning functions and activities (including career counselling, conducting behavioural questionnaires, preparing behavioural profiles, providing resume and job application services and delivery of outplacement services). This may include:

- The information that you provide to us directly when you fill out and submit our enquiry form, questionnaire or any other information in connection with your request to gain additional information about our career counselling and/or career planning services.
- The information that you provide to us when engaging in the activities and services carried out by Inspired Career Planning.
- The information that we collect as a result of consultation with you, including:
  - Responses to questions asked during career counselling;
  - Any third party reference that we receive about you (we will only contact referees that you have provided to us that we deem necessary to support your career planning activities), including opinions of others about your work performance, your work experience and qualifications;
  - Information from educational institutions, including records of your training results;
  - Service notes relating to discussions that we have with you (including telephone, face-to-face, email, etc).
- Any information that we collect to manage a complaint, investigation or inquiry in which you are involved;
- Invoices for services provided and payment information including receipts;
- Any other information that you provide us (or authorise a third party to provide us) about you.

We may also collect personal information about you from a range of publicly available sources including newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from publicly available sources for inclusion in our records we will manage the information in accordance with the [APPs](#) and our Privacy Policy.

Personal information that we collect may include sensitive information which is a special category, as defined in privacy legislation. It could include, for example, relevant information about your health status or information obtained lawfully via a criminal history check. We will only seek to collect sensitive information if you consent and if it is permitted under Australian Privacy Principles and other laws such as Anti-Discrimination.

Sometimes the technology that is used to support communications between us will provide personal information to us - see the section in this policy on Electronic Transactions (3.7).

If you only browse our website, we do not collect information that identifies you personally, though we may collect information related to your visit to our website. Information that may be logged includes the type of browser you are using,



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the date/time of your visit, your top level domain name, the address of the referring site, your server's IP address and the address of the pages accessed and any documents downloaded. No attempt will be made to identify users or their browsing activities, unless the user acts unlawfully, disclosure is required by law or due to a mandatory requirement of a Court, Government Agency or Regulatory Authority. We use all information for statistical analysis or systems administration purposes only.

We may decline to collect unsolicited personal information from or about you and take steps to purge it from our systems.

**We will only collect information that is reasonably necessary for the performance of our functions or activities.**

### 3. Purposes

We do not collect or use personal information for the purposes of unlawful discrimination. Information that we collect, hold, use and disclose is typically used in connection with:

- our identification of your career planning needs and/or your actual or possible engagement of our services;
- delivery of our career planning services (including career counselling);
- marketing services to you;
- the necessary validation (including from appropriate third party sources) of your resume, nominated references, stated qualifications, experience, training or abilities;
- management of any complaint, investigation or inquiry in which you are involved;
- any insurance claim or proposal that requires disclosure of your personal or sensitive information;
- statistical purposes and our statutory compliance requirements.

#### 3.1. Our Policy on Direct Marketing

Inspired Career Planning may use your personal information to identify products and services, or other information that we think may be of interest to you. This is designed to maintain open communication and share industry news, statistical data and promote our range of products and services.

Inspired Career Planning may also, from time-to-time, conduct optional surveys and questionnaires in an effort to collect data and to support continuous improvement.

Inspired Career Planning will ensure that:

- Individuals are clearly notified of their right to unsubscribe from further marketing communication; and if an individual unsubscribes from all direct marketing, this will be respected and we will remove you from our direct marketing database.
- We will not use sensitive information for direct marketing.
- We will not disclose personal information to organizations outside of our company and our related companies for the purposes of allowing them to direct market their products.
- We comply with anti-spam legislation.
- We will not attempt to match de-identified or anonymous data collected through surveys or such online devices as "cookies" with information identifying an individual, without the consent of the relevant individual, unless disclosure is required by law or due to a mandatory requirement of a Court, Governmental Agency or Regulatory Authority. We use all information for statistical analysis or systems administration purposes only.

#### 3.2. Photos & Images

We will not request that you supply photographs, scan photo ID, or capture and retain video image data of you in cases where simply sighting photographs or proof of identity documents would be sufficient in the circumstances.

#### 3.3. Electronic Transactions

Sometimes, we collect personal information that individuals choose to give us via online forms or by email, for example when individuals:

- ask to subscribe to an email list such as our E-Newsletter or blog;
- make a written online enquiry, submit a feedback form or email us through our website;
- email us.

It is important that you understand that there are risks associated with use of the Internet and you should take all appropriate steps to protect your personal information. It might help you to look at the OAIC's resource on [Internet Communications and other Technologies](#). You can [contact us](#) by telephone if you have concerns about making contact via the Internet.

## 4. How your personal information is held

Personal information is held by Inspired Career Planning in hard copy and/or electronic form until it is no longer needed for any purpose for which it may be used or disclosed at which time it will be de-identified or destroyed provided that it is lawful for us to do so.



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We take a range of measures to protect your personal information from misuse, interference and loss; and unauthorised access, modification or disclosure.

### 4.1. Information Security

Information is stored in hard copy and/or in electronic form. Inspired Career Planning has designed our systems with the following aims:

- Prevent the misuse, loss or inappropriate accessing, modification or disclosure of personal information;
- Comply with relevant legislation and regulations;
- Preserve the information in the event of a disaster.

Security of personal information is important to us and some of the ways that we protect personal information include:

- Security at our work sites;
- Restricting access to personal information only to staff who need it to perform their day-to-day functions;
- Maintaining technology products to prevent unauthorised computer access or damage to electronically stored information, such as requiring identifiers and passwords, firewalls and anti-virus software; and
- Maintaining physical security over paper records, including shredding and secure disposal of obsolete information.

## 5. Disclosures

We may disclose your personal information for any of the [purposes](#) for which it is primarily held or for a lawful [related purpose](#). We may disclose your personal information where we are under a legal duty to do so. Disclosure will usually be:

- internally and to our related entities;
- to referees (that you provide us with permission to contact) to enable us to conduct a verbal reference check;
- our behavioural profiling partners/specialists;
- our insurers;
- a professional association or registration body that has a proper interest in the disclosure of your information;
- a parent, guardian, holder of an enduring power of attorney (or like authority) or next of kin whom we may contact in any case in which consent is required or notification is to be given and where it is not practicable to obtain it from or give it directly to you;
- any person with a lawful entitlement to obtain the information.

### 5.1. Related Purpose Disclosures

We outsource some services to contracted service suppliers (CSPs) from time to time. Our CSPs may see some of your personal information. Typically our CSPs would include:

- Software solutions providers, IT contractors, database designers and Internet Service Providers
- Legal and other professional advisors
- Insurance brokers, loss assessors and underwriters
- Superannuation fund managers
- Background checking and screening agents

We take reasonable steps to ensure that terms of service with our CSPs recognise that we are bound by obligations to protect the privacy of your personal information and that they will not do anything that would cause us to breach those obligations.

## 6. Access & Correction

Subject to some exceptions set out in privacy law, you can gain access to your personal information that we hold.

Important exceptions include evaluative opinion material obtained confidentially in the course of our performing reference checks; and access that would impact on the privacy rights of other people. In many cases evaluative material contained in references that we obtain will be collected under obligations of confidentiality that the person who gave us that information is entitled to expect will be observed. We do refuse access if it would breach confidentiality.

For more information about access to your information see our [Access Policy](#) (6.1).

For more information about applying to correct your information see our [Correction Policy](#) (6.2).

### 6.1. Access Policy

If you wish to obtain access to your personal information you should contact our Privacy Co-ordinator:

General Manager

P: 07 3812 2920

E: [privacy@inspiredcareerplanning.com.au](mailto:privacy@inspiredcareerplanning.com.au)

You will need to be in a position to verify your identity. In some cases we may impose a moderate charge for providing access to personal information. We will not charge you simply because you lodge a request for access.



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### 6.2. Correction Policy

If you find that personal information that we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to correct it by contacting us.

We will take such steps as are reasonable in the circumstances to correct that information to ensure that, having regard to the [purpose](#) for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

If we have disclosed personal information about you that is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to notify the third parties to whom we made the disclosure and we will take such steps (if any) as are reasonable in the circumstances to give that notification unless it is impracticable or unlawful to do so.

If we are unable to agree that personal information that we hold about you is accurate, complete and up-to-date, you may ask us to place with the information a statement by you that claims that particular information is not accurate, complete and up-to-date.

## 7. Complaints

You have a right to complain about our handling of your personal information if you believe that we have interfered with your privacy.

### 7.1. Complaints procedure

If you are making a complaint about our handling of your personal information, it should first be made to us in writing.

You can make complaints about our handling of your personal information to our Privacy Co-ordinator, whose contact details are:

General Manager  
PO Box 607  
IPSWICH QLD 4305

[privacy@inspiredcareerplanning.com.au](mailto:privacy@inspiredcareerplanning.com.au)

You can also make complaints to the [Office of the Australian Information Commissioner](#).

When we receive your complaint:

- We will take steps to confirm the authenticity of the complaint and the contact details provided to us to ensure that we are responding to you or to a person whom you have authorised to receive information about your complaint;
- Upon confirmation we will write to you to acknowledge receipt and to confirm that we are handling your complaint in accordance with our policy;
- We may ask for clarification of certain aspects of the complaint and for further detail;
- We will consider the complaint and may make inquiries of people who can assist us to established what has happened and why;
- We will require a reasonable time (usually 30 days) to respond;
- If the complaint can be resolved by procedures for [access and correction](#) we will suggest these to you as possible solutions;
- If we believe that your complaint may be capable of some other solution we will suggest that solution to you, on a confidential and without prejudice basis in our response.

If the complaint cannot be resolved by means that we propose in our response, we will suggest that you take your complaint to any recognised external dispute resolution scheme to which we belong or to the [Office of the Australian Information Commissioner](#).