Our commitment to you

Your security and privacy is of upmost importance. We will ensure that we take all measures to protect the information of candidates, clients, suppliers and employees.

Privacy Policy

Grey Matta Solutions (commonly referred to as "GMS") and its divisions (GMS Business, GMS Human Resources, GMS Recruitment, GMS Digital) are committed to protecting the privacy of the personal information that we collect from you, respecting your rights to privacy and complying with the *Privacy Act 1988* (Cth) (**Privacy Act**).

This Privacy Policy details how we comply with our privacy obligations and how we collect and manage the personal information you provide to us. By submitting personal information to us, you agree to our use of your personal information as described herein. Your use of all websites owned or operated by or on behalf of GMS, including those available at or via **http://www.greymattasolutions.com** (collectively, the "GMS Site"), is subject to this Privacy Policy. You may not use the GMS Site if you do not agree to this policy.

1. What is your personal information?

When used in this policy, the term "personal information" has the meaning given to it in the Privacy Act. Personal information includes information or an opinion about an identified individual, or an individual who is reasonably identifiable from the information or opinion. In summary, personal information is any information about you that can be linked to you.

2. What personal information do we collect and hold?

The personal information collected may consist of your name, address, telephone number, photo, email address, age or birthdate, a unique site access ID, company or educational affiliations, profession or occupation, qualifications, titles, contact information, information from your CV, employment records, details of our services you have used or enquired about and other information about you.

Sensitive information is a specific category of personal information. Such information includes membership of a profession or trade association or of a trade union, health information, criminal record and the like. We may need to collect, hold and disclose sensitive information about you in relation to the specific requirements of your placement with our clients or direct engagement by us or to provide you with services. If we do, we will get your specific consent to the collection and use of this information.

We may collect some information that is not personal information because it is not linked to you or any other identifiable person. This may include aggregated information about how users use the GMS Site, anonymous answers to surveys and other information that is not linked to your identity.

3. How do we collect and hold your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. We can also collect personal information in a variety of ways, including via the GMS Site (such as when users sign up to enquiry forms), when you respond to e-mail questionnaires or when you provide personal information to us by other means, such as in-person during conversations with our representatives, via your employer for the purposes of providing services to your employer, providing a business card, over the phone or by email ect.

We may also collect personal information from third parties including:

- our service providers;
- business affiliates;

- clients; and
- other third parties such as employers and persons nominated by you as referees, credit agencies or government agencies.

Personal information is held by us in secure physical and electronic data systems.

4. For what purposes do we collect, hold and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality service to you. We collect, hold and disclose your personal information for the following purposes (in some cases we may only disclose information with your consent):

- to provide our services to you and or your employer, including to fulfil your requests for information and employment opportunities and to manage the recruitment process for third parties and ourselves;
- to manage our client and business relationships;
- to provide assessment and other consulting services;
- to undertake PRISM Behavioural Brain Mapping;
- to perform statistical analyses of user behaviour in order to measure interest in specific areas and articles posted on the GMS Site. The e-mail addresses provided at registration allow us to send e-mails to individuals based on the areas of interest that they may indicate during the employment registration process;
- to send communications requested by you, answer enquiries and provide information about existing or new services;
- to provide your updated personal information to related bodies corporate, our customers, contractors or service providers if such disclosure is required to administer our business functions or to provide our products and services to you;
- to update our records and keep your records up to date;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in cooperation with any governmental authority of any country.

We will not intentionally disclose (and will take commercially reasonable steps to prevent the accidental disclosure of) your personal information to third parties, whether for such third parties' marketing purposes or otherwise, except when we believe we are under a legal duty to do so.

If we are unable to collect your personal information, we may be unable to fulfil some or all of the purposes listed above. In particular, we may be unable to provide our services to you.

5. Are cookies and IP addresses used?

The GMS Site uses “cookies” to identify you and your interests and to track usage of the GMS Site in order to help personalise your browsing experience. Cookies are small pieces of text stored on your computer that help us know which browser you are using and where you have been on the GMS Site and on websites to which you

may link in order to use some of our features. Cookies also let us know whether you have registered with us and otherwise enable us to relate your current usage of the GMS Site to your prior usage. If you do not wish to receive cookies, you can set your browser to refuse them. However, a user who does not accept the cookie from the GMS Site may not be able to access certain areas and may limit your use of the GMS Site and some of our services. In administering the GMS Site and diagnosing potential system problems, we also log all IP addresses which access the GMS Site.

6. To whom do we disclose your information

We may disclose your personal information to:

- our customers;
- contractors or service providers if such disclosure is required to administer our business functions or to provide our products and services to you;
- our employees, related bodies corporate, contractors or service providers for purposes of operation of our website and to fulfil your requests including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors and professional advisors such as accountants, solicitors, business advisors and consultants;
- any organisation for any authorized purpose with your express consent; and
- should we intend to merge with, or sell the majority of our assets or equity to a third party, personal information may be disclosed to that third party.

7. Direct Marketing Materials

We may send you direct marketing communications and information about our products and services that we consider might be of interest to you. These communications may be sent in various forms, including email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). You consent to receiving direct marketing communications and information from us. However, at any time you may opt out of receiving marketing communications for us by contacting us (see details below).

We do not provide your personal information to other organizations for the purposes of direct marketing without consent by you.

8. Do we disclose your personal information to anyone outside Australia?

We do not disclose your personal information to anyone outside Australia.

9. How can I access, change, and/or delete information?

You may request access to any personal information we hold about you at any time by contacting us. Where we hold information that you are entitled to access, we will try to provide you with a suitable means of accessing it (for example, by emailing it to you). We will not charge for making the request or for making any corrections to your personal information. To do so, please contact your GMS representative or our Privacy Officer by the means set out in paragraph 12. We will then contact you to request sufficient information to allow us to confirm your identity. As soon as practicable after your request is received, we will give you access to your personal information.

There may be times when we cannot grant you access to the personal information we hold. For example, if access would interfere with the privacy of others or if it

would result in a breach of confidentiality or law, we will not be required to grant you access. We will let you know if this is the case.
If you believe that the personal information we hold about you is incorrect, incomplete or inaccurate, you may request us to amend it by contacting our Privacy Officer. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it. You may also have your personal information deleted. You should be aware that we are required by law to retain certain personal information (such as payroll records); such information will not be deleted. We will let you know if we cannot delete your personal information for legal or other reasons.
Of course, if your personal information has been deleted and you wish to apply for another position through us, you will need to repeat the application process.

10. Security

We take reasonable steps to ensure that your personal information is protected from misuse, loss and from unauthorized access, modification or disclosure. We may hold your information in either or both electronic or hard copy form. Only authorized personnel will be provided with access to personal information. These parties are required to treat this information as confidential and deal with it in accordance with this Privacy Policy. Personal information is destroyed or de-identified when no longer needed.
If any personal information has been lost or subjected to unauthorised access, use, modification, disclosure or other misuse (**Data Breach**), GMS will take all necessary steps to immediately contain the Data Breach, rectify the Data Breach and prevent the Data Breach from occurring in the future. Where the Data Breach is deemed eligible and likely to result in serious harm, GMS will take reasonable steps to notify you and provide you with relevant information in relation to the Data Breach.
As the GMS Site is linked to the internet and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any information which you transmit to us online is transmitted at your own risk.

11. Links to third party sites

The GMS Site may contain links to third party websites as a service to our users. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy polices or the content of any third party website. We encourage you to review and understand the privacy policies of the relevant third parties before providing any information to them.

12. Contact our Privacy Officer

If you have any questions in relation to your Personal Information, our Privacy Policy or any concerns or a complaint regarding the treatment of your Personal Information by us, please e-mail us at marketing@greymattasolutions.com. We will treat your requests or complaints confidentially. Our Privacy Officer will contact you within a reasonable time after receipt of your request or complaint to discuss your concerns and to outline options regarding how they may be resolved.
General information about privacy may be found via **http://www.privacy.gov.au/** and **http://www.oaic.gov.au/**.

We may change this Privacy Policy from time to time and all personal information held by us will be governed by the most recent version of our Privacy Policy. Any updated versions of this policy will be posted on the GMS Site.