

## Privacy Policy

### 1. Introduction and who we are

Schrole Group Limited (ACN: 164 440 859) and all of its subsidiaries including Schrole UK Limited (a company registered in England and Wales with company number 11097171) (together "**we**", "**our**" or "**us**") are strongly committed to being responsible custodians of the information you provide us and the information we collect in the course of operating our business.

This Privacy Policy explains how, as a data controller, we may collect, use, and share information that we obtain about you directly or indirectly in accordance with applicable data privacy laws.

Where you use our services, or your personal data is processed in connection with such services, we will be the data controller of such information.

This Privacy Notice does not apply to any third party websites which may be accessible through links from this website (please see the section 12 (Online services - Links to third party sites, services and content) below for more information).

### 2. Scope of Privacy Policy

This Privacy Policy explains and describes:

- When this Privacy Policy applies.
- The types of personal data we collect.
- How we use the personal data we collect.
- How and when we may disclose personal data that we collect.
- How we protect your personal data and keep it secure.
- What cookies are and how we use them.
- What happens when you access third-party services and content.
- Your legal choices and rights.
- The status of this policy and any changes that are made to it.
- How to contact us.

### 3. When this Privacy Policy applies

This Privacy Policy applies:

- to your use of any of our services;
- where you apply to us for a job or work placement;
- your supply of services to us where this involves any personal data;
- as a result of your relationship with one or more of our clients; and/or
- to any information collected from third parties.

This Privacy Policy also applies to our website and online services, including Schrole Group Limited, Schrole Connect, Schrole Cover, Schrole Verify, ETAS Group each of which can be found at the corresponding web address as follows:

[www.schrolegroup.com](http://www.schrolegroup.com),

[www.schroleconnect.com](http://www.schroleconnect.com),

[www.schrolecover.com](http://www.schrolecover.com),

[www.schroleverify.com](http://www.schroleverify.com),

[www.etasgroup.com](http://www.etasgroup.com),

and any other website, mobile app or other online service created or hosted by us from time to time on which this privacy policy appears (together, our "**online services**") through which we may collect certain details if, for example, you want to subscribe to any publications or newsletters that we may periodically issue.

In addition, our online services make use of cookies and similar technologies, as described in more detail in section 11 (Cookies Policy) below.

### 4. How we collect your personal data

"**Personal data**" is any information that can be used to identify you or that we can link to you.

Where you **use our services**, we will collect personal data directly from you.

We may also collect personal data from third parties such as your employing organisation, regulatory authorities, recruitment agencies, credit reporting agencies, information or service providers, publicly available records, and the third parties described in section 7 (Disclosure of your information) below.

We collect information that you voluntarily provide to us, including when you communicate with us via email or other channels; when you sign up for or request that we send you newsletters, alerts, or other materials; when you sign up for a webinar or event; and when you respond to our communications or requests for information.

The information you provide may include current and historical personal data including your name, contact details, title, identification, employment, positions held and enquiry/complaint details and information about the organisation with which you are affiliated. We may also collect personal data about your other dealings with us and our clients, including any contact we have with you in person, by telephone, email or online.

We may collect information from other sources, such as social media platforms that share information about how you interact with our social media content, and any information gathered through these channels will be governed by the privacy settings, policies, and/or procedures of the applicable social media platform, which we strongly encourage you to review.

We will handle any unsolicited information in accordance with law, including destroying or de-identifying such information where we are required to do so.

When you use our **online services**, we may collect the following:

- Information you provide by completing forms (this includes information you give us, submitting material, requesting services, entering competitions, registering for any of our online offerings or subscribing to our newsletters or other services).
- Information you provide by your participation in competitions, live chats, message boards.
- Information you provide to us if you contact us, for example to report a problem with our online services or raise a query or comment.
- Details of visits made to our online services including, but not limited to, the volume of traffic received, logs (including, where available, the IP address and location of the device connecting to the online services and other technical information and identifiers about the device and the nature of the visit) and the resources accessed.
- Where our online services require that you enter a password or other information in order to access certain features, we will collect such credentials when you enter them.

If you **apply for a job or work placement with us** then you may need to provide information about your education, employment, racial background and state of health. As part of your application you will be asked to provide your express consent to our use of this information to assess your application and to allow us to carry out both recruitment analytics and any monitoring activities which may be required of us under applicable law as an employer. We may also carry out screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks) and consider you for other positions.

We may exchange your personal data with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, recruitment analytics providers, referees and your current and previous employers. We may also gather additional information about you from publicly available resources such as LinkedIn or other social or professional media platforms and collate this with the information that you provide to us. Without your personal data we may not be able to progress considering you for positions with us.

If you **apply for a job or work placement through any of our online services** then you may need to provide information about your education, professional memberships and licences, employment, referees, address history, country of birth, country of citizenship, language skills, if you hold an EU passport, date of birth, gender, relationships, dependents and contact details. As part of your sign-up to the online

services you will be asked to provide your express consent to the use of this information to assess any of your applications for jobs on the online services.

The party to whom you are applying may use this information to assess your application and to carry out recruitment analytics and monitoring activities which may be required under applicable law as an employer. This may also include carrying out screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks) and they may also consider you for other positions.

Your personal data may be exchanged with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, recruitment analytics providers, referees and your current and previous employers. Without your personal data you may not be considered for a job application.

If you **order screening and background checks** then you may need to provide information about your identity, education, employment, address history, depending on the checks that have been ordered. As part of the ordering process, you will be asked to provide your express consent to the use of this information to undertake the selected screening and background checks.

Depending on the checks ordered, your personal data may be exchanged with academic institutions, screening check providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers. We may also gather additional information about you from publicly available resources such as LinkedIn or other social or professional media platforms and collate this with the information that you provide to us. Without your personal data the ordered screening checks cannot be completed.

If you **sign-up to the relief / cover system** then you will need to provide information about your email address. You may choose to add more personal data including phone number, address, résumé, professional memberships and employment licences. As part of the sign-up process, you will be asked to provide your express consent to the use of this information by the parties for whom you work and parties to whom you apply to work. Without your personal data you may not receive invitations for relief work or may be unable to post or review relief jobs.

For more details on the Privacy Policy for **Vocational Education and Training** supplied by ETAS (WA) Pty Ltd, a subsidiary of Schrole Group Ltd, please refer to the following [link](#).

## 5. Legal basis for usage of personal data

Where we intend to use your personal data, we rely on the following legal grounds:

**Performance of a contract:** We may need to collect and use your personal data to enter into a contract with you or to perform a contract that you have with us. For example, an organisation recruiting through Schrole Connect may use personal data to assess suitability of an applicant, and where we respond to your requests and provide you with services in accordance with our [terms and conditions](#) or other applicable terms of business agreed with you or with your employing organisation.

**Legitimate interests:** Where we consider use of your information as being (a) non-detrimental to you, (b) within your reasonable expectations, and (c) necessary for our own, or a third party's legitimate purpose, we may use your personal data, which may include:

- for our own direct marketing or continued communication;
- the prevention of fraud;
- our own internal administrative purposes;
- personalisation of the service(s) we provide to you;
- ensuring network and information security, including preventing unauthorised access to electronic communications networks and stopping damage to computer and electronic communication systems;
- reporting possible criminal acts or threats to public security to a competent authority.

**Compliance with a legal obligation:** We may be required to process your information due to legal requirements, including employment laws, tax laws and other regulatory provisions applicable to us as a provider of an online recruitment platform, screening and background checking, relief staff management system and vocational education and training services.

**Consent:** You may be asked to provide your consent in connection with certain services that we offer, for example in respect of any processing of your personal data for our marketing purposes where you or your employing organisation is not one of our clients, or in respect of certain special categories of personal data such as your health or racial background for which we are legally obliged to gain your consent due to the sensitive nature of such information and the circumstances in which it is gathered or transferred. Where we are reliant upon your consent, you may withdraw this at any time by contacting us in accordance with section 15 (Contact and further information) below.

## 6. How we use your personal data

We use your information in order to provide you with, and improve, our services, for example:

- To provide you with an online recruitment platform, screening and background checking, relief staff management system and vocational education and training services that you or your employing organisation has contracted us to provide.
- To respond to your enquiries.

- To carry out our obligations arising from any contracts entered into between you and us.
- To facilitate our internal business operations, including to fulfil our legal or regulatory requirements.
- To maintain and develop our relationship with you.
- For our business purposes, including data analysis, submitting invoices, detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement.
- To maintain and update our records including our database of contacts.
- To provide you on an ongoing basis with information and services, including relevant marketing communications related to us, and other information or materials, that you request from us or which we feel may interest you where you have indicated that you would like to receive these from us.
- To evaluate, recruit, and hire personnel.
- To measure the popularity and effectiveness of services such as newsletters and seminar invitations, in order to improve what we offer to you and other recipients.
- To ensure that content from our online services is presented in the most effective and secure manner for you and the device on which you are accessing our services, and to troubleshoot, and improve such online services.
- To allow you to use or access interactive features or secure areas of our online services, when you choose to do so.
- For research, planning, service development, security or risk management.
- As we believe reasonably necessary or appropriate to: comply with our legal obligations; respond to legal process or requests for information issued by government authorities or other third parties; or protector your, our, or others' rights.

We may not be able to do some or all of these things without your personal data.

If at any time we intend to change the purpose for which we hold your personal data, for example to offer you with a complimentary service that we may provide in the future, we will give you prior information of that new purpose so you are aware of this.

## **7. Disclosure of your information**

We may, in providing our services and operating our business, allow access to your personal data to the different entities within our group for our internal administrative purposes such as billing, promoting our events and services, and providing you or your organisation with services, provided in all instances that such processing is consistent with the section 5 (Legal basis for usage of personal data) above and applicable law.

In addition, we may exchange your personal data with third-party service providers contracted to us where any of the following apply:

- You have consented to us sharing your personal data in this way.

- We deem reasonably necessary to provide you with the services that you have required at any particular time.
- Such sharing is provided for under contract, including our [terms and conditions](#) for any particular service that we may provide to you.
- Such sharing is to law enforcement bodies or other government authority.
- We need to enforce or apply our [terms and conditions](#) to which you have agreed (or other terms that have been agreed to apply to our relationship with you or your employing organisation).
- It is necessary to protect the rights and interests, property, or safety of us, our clients or others.
- It is relevant in the circumstances to disclose the information to parties with whom we have co-promotional arrangements (such as jointly sponsored events, external venues, or caterers).
- Our agents or contractors who assist us in providing our services require such information, for example in fulfilling requests for information, receiving and sending communications, updating marketing lists, analysing data, providing support services or in other tasks from time to time. Our agents and contractors will only use your information to the extent necessary to perform their functions.
- We use third party service providers to provide services that involve data processing, for example archival, web-hosting, analytics providers in connection with the operation of our online services, event hosting, information technology providers, auditing, reference checking, professional advisory (including legal, accounting, financial and business consulting), delivery, technology, website, banking, payment, client contact, and marketing. A full list of key service providers can be found at [List of Suppliers](#). This link may be updated from time to time as we change, add or update our suppliers.
- All, or most, of the assets of or any single business unit within are merged with or acquired by a third party, or we expand or re-organise our business, in which case your personal data may form part of the transferred or merged assets.
- We are under a legal, regulatory or professional obligation to do so (for example, in order to comply with a Court Order).

Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When such third parties no longer need your personal data to fulfil this service, they will dispose of such details in line with our procedures unless they are themselves under a legal obligation to retain information (provided that this will be in accordance with applicable data privacy laws). If we wish to pass your special category personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

We also provide anonymous statistical information about users of our websites and related usage information to reputable third parties, including analytics and search engine providers.

We own the database rights in the information collected via our online services. We do not sell, rent, or otherwise share information that reasonably identifies you or your organisation with unaffiliated entities for their independent use except as expressly described in this Privacy Policy or with your express prior permission.

We may share information that does not reasonably identify you or your organisation as permitted by applicable law.

## 8. International Transfers

Where you are submitting personal data from within the European Economic Area (“**EEA**”), such information may be transferred to countries outside the EEA, including where we transfer personal data or sensitive personal data to Schrole Group Ltd or its subsidiaries.

By way of example, personal data entered into any of our online services is stored in Australia or any other location as determined by us acting at our discretion, and may also be transferred if one or more of our third party service providers with whom we share personal data in accordance with section 7 (Disclosure of your information) are located, or have their servers located, outside your country or the country from which the data were provided.

As we transfer your information outside the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected.

## 9. Retention of your data

We retain the information we collect no longer than is reasonably necessary to fulfil the purposes that such data was originally collected in accordance with our internal data retention policies or to comply with our legal and regulatory obligations.

In accordance with our data retention policy, data is retained as follows:

Online Systems:	up to 21 years after your account is inactive
Financial information:	7 years

## 10. Security

We take steps to hold information securely in electronic or physical form.

Our information security policy is supported by a variety of processes and procedures, and we store information in access-controlled premises or electronic databases requiring logins and passwords. All employees, officers or contractors of and third-party providers with access to confidential information are subject to access controls and confidentiality obligations, and we require our third party data storage providers to comply with appropriate information security industry standards.

Whilst we continually strive to ensure that our systems and controls are updated to reflect technological changes, the transmission of information via the internet is not completely secure, and as such we cannot guarantee the security of your data transmitted to our online services which is at your own risk.



If you communicate with us using a non-secure web platform, you assume the risks that such communications between us are intercepted, not received, delayed, corrupted or are received by persons other than the intended recipient.

Once we have received your information, we will take reasonable steps to use procedures and security features to try to prevent unauthorised access, modification or disclosure.

You can help us to keep your information secure by ensuring that any user name or password in relation to our online services is kept strictly personal to you and will not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using your user details or password.

**11. Cookies Policy**

Our website and services delivered online use cookies and other similar technologies, for example, to distinguish you from other users when you browse our websites or use our online services and also to allow us to improve our online services.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently to improve the user experience, as well as to provide certain information to the owners of the site.

We may, for example, collect information about the type of device you use to access our online services, the operating system and version, your IP address, your general geographic location as indicated by your IP address, your browser type, the content you view and features you access on our online services, the web pages you view immediately before and after you access our online services, whether and how you interact with content available on our online services, and the search terms you enter on our online services.

Our website sets cookies which remain on your computer for differing times. Some expire at the end of each session and some remain for longer so that when you return to our website, you will have a better user experience.

**Which cookies we use**

Detailed below are the cookies we use and why and how long they last.

Google Adwords: expires 180 days

Google LinkedIn: expires 180 days

Google Facebook: expires 180 days

Schrole Online Services:

Session information: expires at end of the session

Security information: expires in 1 hour

We collect standard internet log information and details of visitor behaviour patterns by using Google Analytics cookies. We do this to compile reports and to help us find out things such as the number of visitors to the various parts of our website, so that this can be improved. This information does not identify visitors or collect any personal

details. We do not make any attempt to find out the identities of those visiting our websites. We will not associate any data gathered in this way with any personal data from any source. For more information about Google Analytics cookies please see the link [here](#).

To provide website visitors with more choice on how their data is collected by Google Analytics, Google have developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information about the website visit should not be sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the website itself or to other web analytics services. For more information about Google Analytics Opt-out Browser Add-on please see the link [here](#).

### Control of cookies

Web browsers allow you to exercise some control of cookies through the browser settings. Most browsers enable you to block cookies or to block cookies from particular sites. Browsers can also help you to delete cookies when you close your browser. You should note however, that this may mean that any opt-outs or preferences you set on our website will be lost. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [allaboutcookies.org](http://allaboutcookies.org) which includes information on how to manage your settings for the major browser providers.

## **12. Online services - Links to third party sites, services and content**

In addition to our online services, which we control directly, we also use and provide links to websites which are controlled by third parties, which may include:

- Twitter, LinkedIn and YouTube, where we have certain accounts and profiles.
- Facebook, where we have social pages.
- First Advantage, who undertake screening and background checks.

If you use or follow a link to any of these third-party websites, please be aware that these websites have their own privacy policies and that we cannot accept any responsibility for their use of information about you.

Our online services may include integrated content or links to content provided by third parties (such as video materials). This Privacy Policy does not address the privacy, security, or other practices of the third parties that provide such content.

We engage third parties that support the operation of our online services, such as analytics providers. These third parties may use technologies to track your online activities over time and across different websites and online platforms. Please see section 11 (Cookies Policy) above for more information.

## **13. Your Rights**

Under applicable data protection legislation, we have a duty of care to ensure that your personal data is accurate and up to date.

If you wish to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate, you can maintain your own

information held on the Schrole Connect, Schrole Cover and Schrole Verify services by logging into the relevant online service and making the changes.

If there is information you wish to update or correct that you cannot maintain yourself, then please contact us at [support@schrole.com](mailto:support@schrole.com).

Where you have consented to our processing of certain personal data, you can at any time withdraw such consent and/or tell us not to contact you with updates and information regarding our products and services (or part of them) either at the point such information is collected, (by checking the relevant box) or, where you do not wish us to continue to use your information in this way, by following the unsubscribe instructions on any communications sent to you. You can also exercise this right at any time by contacting us using the contact details at the end of this privacy policy.

You can request:

- access to the personal data we hold about you;
- corrections or updates to your details;
- the right to be forgotten;
- the portability of personal data that you have provided to us in a structured, commonly used and machine-readable format.

You also have the right to object to, or request the restriction of, our use of your personal data.

If you would like to exercise any of the rights set out in this section, please contact us using the details set out in section 15 (Contact and further information) below. We may refuse to provide access where we have legitimate reasons for doing so under applicable data privacy laws, and in exceptional circumstances may charge a fee for access if the relevant legislation allows us to do so, in which case we will provide reasons for our decision.

You may submit a complaint to the Information Commissioners Office, details of which can be found at:

<https://www.oaic.gov.au/about-us/contact-us> (Australia).

If you make a privacy complaint, we will respond to let you know how your complaint will be handled. We may ask you for further details, consult with other parties and keep records regarding your complaint.

#### **14. Status of this policy**

Your provision of personal data to us or use of our online services constitutes your acceptance of the terms of this Privacy Policy.

As technologies and information governance practices develop, and data privacy laws (and surrounding guidance) evolve, we may need to revise this Privacy Policy. You should therefore review this page regularly to ensure that you are aware of any changes to its terms.

We will post any Privacy Policy changes on this page and, if the changes are significant or may materially impact upon your rights, we will provide a more prominent notice or

contact you by other means (including, for certain services, email notification of Privacy Policy changes).

## 15. Contact and further information

To find out more about please visit [www.schrole.com](http://www.schrole.com).

If you have any questions, concerns or comments about this Privacy Policy, or want to submit a written complaint about how we handle your personal data, please write to us via the means set out below.

We, at your request, can confirm what information we hold about you and how it is processed. Where we hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why we process your data.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on our legitimate interests or that of a third party, including information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

In order to verify the identity of those who make a request to us, we will accept the following forms of ID when information on your personal data is requested:

- Passport,
- Driving licence, Birth certificate,
- Utility bill dated within the last 3 months.

### Our contact details:

#### Schrole Group Ltd and its subsidiaries

Contact address: 142 Hasler Road, Osborne Park, Western Australia 6017, Australia

Email: [privacy@schrole.com](mailto:privacy@schrole.com)

Tel: +61 8 9230 7000

The Privacy Officer for Schrole Group Ltd and its subsidiaries is Mr. Peter Liddell

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Appendix: Section 7 – List of Suppliers

**16. Section 7 – List of Suppliers**

Third party service providers contracted to us with whom we may share your personal data –  
Section 7 Privacy Policy

Service Type	3 <sup>rd</sup> Parties		
	Name	Address	Company Number
Auditing - Financial	BDO Australia Limited	Level 10, 12 Creek Street, Brisbane, QLD 4000, Australia	ACN 050 110 275
Legal	Bellanhouse Legal	Level 19, Alluvion, 58 Mounts Bay Road, Perth WA 6000, Australia	ACN 164 886 088
	Oury Clark Consultants LLP	10 John Street, London, WC1N 2EB, England	OC305454
Banking	National Australia Bank Limited	800 Bourke Street, Docklands VIC 3008, Australia	ACN 004 044 937
On-line payments	National Australia Bank Limited	800 Bourke Street, Docklands VIC 3008, Australia	ACN 004 044 937
Online service hosting	Microsoft Pty Ltd	1 Epping Road, North Ryde, NSW 2113, Australia	ACN 002 589 460
	Rackspace Hosting Australia Pty Limited	1 Templar Road, Erskine Park NSW 2759, Australia	ACN 153 275 524
Email vendor	SendGrid Inc	1801 California Street, Suite 500, Denver, Colorado 80202, USA	SEC# 001-38275
Information technology	NewTrend Pty Ltd	28 / 133 Kewdale Road, Kewdale WA 6105, Australia	ACN 617 445 888
	TMA Solutions	111 Nguyen Dinh Chinh, Phu Nhuan District, Ho Chi Minh City, Vietnam	0301425912
Corporate advisory & public relations	Altor Capital Pty Ltd	Level 11, 82 Eagle Street, Brisbane QLD 4000, Australia	ACN 604 411 720
	Henslow Pty Ltd	Level 7, 333 Collins Street, Melbourne VIC 3000, Australia	ACN 605 393 137
Screening Services	Avanz Pte Ltd	3 Phillip Street, Royal Group Building, Level 19, Singapore 048693	201608532H
Client contact	Turnbull Family Trust (Turnbull Marketing)	18 Baden St, Osborne Park WA 6017, Australia	ACN 258 419 273
Recruitment services	International School Services Inc	15 Roszel Road, Princeton, New Jersey 08543, United States of America	