



# PRIVACY POLICY

VouchFor (hereinafter referred to as "VouchFor", "we", "us" or "our") operates a referral job platform and that helps people utilise their contact list to recommend and refer people to jobs around the world, whether through our website or our mobile applications ("Platform"). VouchFor refers to VouchFor Pty Ltd.

This Privacy Policy is intended to inform you about how we treat Personal Information that we process about you. If you do not agree to any part of this Privacy Policy, then we cannot provide the Platform to you, and you should stop accessing the Platform and deactivate your VouchFor account.

## Definitions

"Aggregated information" means information about all of our users or specific groups or categories of users that we combine together and which does not include the users' Personal Information.

"Data Controller" means VouchFor, the company responsible for the use of and processing of Personal Information.

"Personal Information" means information relating to a living individual who is or can be identified either from that information or from that information in conjunction with other information that is in, or is likely to come into, the possession of the Data Controller.

## What types of information does VouchFor gather about its users?

### 1. Information that you give us

We receive, store and process information that you make available to us when accessing or using our Platform.

Examples include when you:

1. fill in any form on the Platform, such as when you register or update the details of your user account;
2. access or use the Platform, such as to search for or post a job, make or accept applications for a job, refer a job, post comments or reviews, or communicate with other users;
3. link your account on a third party site (e.g. LinkedIn) to your VouchFor account, in which case we will obtain the Personal Information that you have provided to the third party site, to the extent allowed by your settings with the third party site and authorised by you;
4. communicate with VouchFor.

### 2. Mobile Data

When you use certain features of the Platform, in particular our mobile applications we may receive, store and process different types of information about your location, including general information (e.g., IP address, post code) and more specific information (e.g., GPS-based functionality on mobile devices used to access the Platform or specific features of the platform). If you access the Platform through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this. See your device manufacturer's instructions for further details.

### 3. Log Data

We may also receive, store and process Log Data, which is information that is automatically recorded by our servers whenever you access or use the Platform, regardless of whether you are registered with VouchFor or logged in to your VouchFor account, such as your IP Address, the date and time you access or use the Platform, the hardware and software you are using, referring and exit pages and URLs, the number of clicks, pages viewed and the order of those pages, and the amount of time spent on particular pages.

#### 4. Cookies, and other Tracking Technologies

VouchFor uses cookies and other similar technologies on the Platform. We may also allow our business partners to use their cookies and other tracking technologies on the Platform. As a result, when you access or use the Platform, you will provide or make available certain information to us and to our business partners.

While you may disable the usage of cookies through your browser settings, we do not change our practices in response to a "Do Not Track" signal in the HTTP header from your browser or mobile application. We track your activities if you click on advertisements for VouchFor services on third party platforms such as search engines and social networks, and may use analytics to track what you do in response to those advertisements.

We may, either directly or through third party companies and individuals we engage to provide services to us, also continue to track your behaviour on our own Platform for purposes of our own customer support, analytics, research, product development, fraud prevention, risk assessment, regulatory compliance, investigation, as well as to enable you to use and access the Platform and pay for your activities on the Platform. We may also, either directly or through third party companies and individuals we engage to provide services to us, track your behaviour on our own Platform to market and advertise our services to you on the Platform and third party websites.

#### 5. Third-party social plugins

Our Platform may use social plugins, which, are provided and operated by third-party companies, such as LinkedIn.

As a result of this, you may send to the third-party company the information that you are viewing on a certain part of our Platform. If you are not logged into your account with the third-party company, then the third party may not know your identity. If you are logged into your account with the third-party company, then the third party may be able to link information about your visit to our Platform to your account with them. Similarly, your interactions with the social plugin may be recorded by the third party.

Please refer to the third party's privacy policy to find out more about its data practices, such as what data is collected about you and how the third party uses such data.

## How VouchFor uses the information

We use and process Information about you for the following general purposes:

By registering with vouchfor.com.au.au, by managing your profile, or by opting in when presented with choices, you have consented for us to use your information in the following ways:

- to create a profile for you based on information that you have provided to us, information imported from other sites or applications, or information provided to us by third parties such as your contacts or advertisers;
- to provide personalised, targeted, or location-based content, services, and advertising from us and third parties;
- to allow you to contact other users or to invite others to join or create an account;
- to allow you to import information about yourself or your contacts from other sites or applications or to export your information to other sites or applications;
- to contact you about feature updates, informational and service-related communications, including important security updates;
- to provide you with additional communications, information, and promotions such as newsletters and career advice;
- to inform you of other products or services available from vouchfor.com.au or its affiliates;
- to enable you to contact us and for us to respond to you to conduct surveys, promotions and contests, and to publish the results thereof;
- to help you and your friends, contacts, and potential employers connect on the platform;
- to provide information about you and your potential interest in job postings to employer customers;

- to provide products and services to employer customers to complete the recruitment and hiring process;
- to provide products and services that enable users to network, post job information, view and compare profiles;
- to generate internal reports about the use of our sites and applications;
- to allow you to share jobs and company profile information with your connections;
- to give search engines access to public information;
- to detect, investigate and prevent activities that may violate our policies or be illegal.

## Your CVs and Cover Letters

When you create or post a Cover Letter (CL) or CV, we store it in our system. CLs or CV's will not be searchable in our system. You may use your CL or CV to apply online to a job. If you do, your CL or CV will be transferred to the relevant employer, who may retain a copy of your CL or CV or distribute it to third parties which is out of our control. We cannot control the retention, use or privacy of CLs or CVs that have been viewed or downloaded by third parties who access our system. Once your CL or CV has been disclosed, Vouchfor.com.au is not able to retrieve it from the third parties who accessed it.

Using industry best-practices and advanced technology to help ensure the privacy and integrity of our customers' data, VouchFor limits access to our system to legitimate users such as paying employers, referrers, recruiters, hiring managers, headhunters and human resource professionals. Despite best efforts, no method of transmission over the Internet and no method of electronic storage is perfectly secure. We cannot guarantee absolute security, however if VouchFor learns of a security breach, we will notify affected users so that they can take appropriate protective steps.

You may remove your CL or CV from our system at any time. However anyone who viewed your CL or CV may have kept a copy of it in their own files or databases. Accordingly, you should not put sensitive information, personality profiles, or other information you would not want made public, in your CL or CV.

CLs or CVs you give to us must not contain sensitive data relating to your (i) racial or ethnic origin (ii) political beliefs (iii) philosophical or religious beliefs (iv) membership of a trade union or political party (v) physical or mental health or biometric details or genetic makeup (vi) addictions, sexual life (vii) the commission of criminal offences or proceedings and associated penalties or fines, (viii) the commission of any unlawful or objectionable conduct and associated penalties, or (ix) any Social Security Number or national identification number. If your CL or CV does contain this information, then you agree that it is at your own risk. We cannot control third parties' access to, and use of such information.

## How VouchFor stores information

We retain all the information we gather about you in an effort to make repeat use of our sites more efficient, practical and relevant until you change or remove your personal data as described below. You may access, review, correct, update, change or delete your profile or uploaded files such as your CL or CV at any time. Log into your account, go to your profile or CL or CV, and make the desired changes.

Access to or correction, update, or deletion of your personal information may be denied or limited by vouchfor.com.au if it would violate another person's rights and/or as otherwise permitted by applicable law. If you wish to delete or close your account or account profile information altogether, please contact us. We will send you an email to confirm that your personal information has been deleted (save for an archival copy which is not accessible by you or third parties on the Internet). The archival copy is retained only for as long as needed for audit and record purposes. We will also keep logs and information that may relate to your activity on the site. We will respond to information access requests without undue delay of receipt and in any event within 30 days. If we require additional time to provide access to your information, we will acknowledge receipt of your request within 30 days and promptly supplement our response within the time period required by applicable law.

If you do not log into your account for a significant period of time, it will expire and be scheduled for deletion. Expired accounts are deleted on a periodic basis. Our current expiration period is approximately 36 months; we may extend or reduce this period in order to adjust to changing usage patterns. If we change the period, we will update this notice. There will always be an email sent to the given email address from us before we delete your CV in this manner.

## When VouchFor discloses or shares personal information, and to whom

**IMPORTANT:** When you use the Platform, your data may be sent to other countries. We may transfer, store, use and process your information, including any Personal Information, to countries outside of Australia, the European Economic Area ("EEA") including the United States. Please note that laws vary from jurisdiction to jurisdiction, and so the privacy laws

applicable to the places where your information is transferred to or stored, used or processed in, may be different from the privacy laws applicable to the place where you are resident.

The publication and display of information that you provide to VouchFor is subject to your settings and authorizations on the Platform and the third party site.

- We may distribute parts of the Platform (Job Brief) for display on sites operated by VouchFor's business partners, using technologies such as HTML widgets. If and when your Listings are displayed on a partner's site, information from the Job Brief may also be displayed.
- We may allow our related entities such as our subsidiaries, and their employees, to use and process your Personal Information in the same way and to the same extent that we are permitted to under this Privacy Policy. These related entities comply with the same obligations that we have to protect your Personal Information under this Privacy Policy.
- We may also engage third party companies and individuals, who may be located outside of your Legal Jurisdiction, to provide services to us, including services to help verify your identification or to conduct checks against databases such as public government databases (where legally allowed). We may provide Personal Information about you to these third parties, or give them access to this Personal Information, for the limited purpose of allowing them to provide these services. We will ensure that such third parties have contractual obligations to protect this Personal Information and to not use it for unrelated purposes.
- You acknowledge, consent and agree that VouchFor may access, preserve and disclose your account information and Collective Content if required to do so by law or in a good faith belief that such access, preservation or disclosure is reasonably necessary to (a) respond to claims asserted against VouchFor; (b) to comply with legal process (for example, subpoenas and warrants); (c) to enforce and administer our agreements with users, such as the Terms of Service, (d) for fraud prevention, risk assessment, investigation, customer support, product development and debugging purposes; or (e) to protect the rights, property or personal safety of VouchFor, its users or members of the public. We will use commercially reasonable efforts to notify users about law enforcement requests for their data unless prohibited by law or by the government request, or if doing so would be futile or ineffective.
- We may also publish, disclose and use Aggregated Information and non-personal information for industry analysis, demographic profiling, marketing and advertising, and other business purposes.

## Business transfers by VouchFor

If VouchFor undertakes or is involved in any merger, acquisition, reorganization, sale of assets or bankruptcy or insolvency event, then we may sell, transfer or share some or all of our assets, including your Personal Information. In this event, we will notify you before your Personal Information is transferred and becomes subject to a different privacy policy.

## How to change or delete your information, or cancel your VouchFor account

You may review, update, correct or delete the Personal Information in your VouchFor account by logging in to your account. If you would like to cancel your VouchFor account, you can do so by logging in to your account. Please also note that any reviews, forum postings and similar materials posted by you may continue to be publicly available on the Platform in association with your first name, even after your VouchFor account is cancelled.

## Keeping your personal information secure

We have implemented industry best practice administrative, technical, and physical security measures to protect your Personal Information against the unauthorized access, destruction or alteration of your information. However, no method of transmission over the Internet, and no method of storing electronic information, can be 100% secure. So, we cannot guarantee the absolute security of your transmissions to us and of your Personal Information that we store.

## Your privacy when you access third-party websites and resources

The Platform will contain links to other websites not owned or controlled by VouchFor. VouchFor does not have any control over third party websites. These other websites may place their own cookies, web beacons or other files on your device, or collect and solicit Personal Information from you. They will have their own rules about the collection, use and disclosure of Personal Information. We encourage you to read the terms of use and privacy policies of the other websites that you visit.

## Changes to our privacy policy

This privacy policy is subject to change without notice. We may change our privacy policy at any time by posting a new version of it on our website. Each version of this privacy policy will be identified by its effective date.

## Effective date

This privacy policy was last revised on 14th April 2014.

## Contacting us

For more information, or if you have questions or concerns regarding VouchFor Privacy Policy, please contact us directly [info@Vouchfor.com.au](mailto:info@Vouchfor.com.au)

## Cookie policy

A cookie is a small tracking code of letters and numbers downloaded on to your computer when you access websites. It is stored in a file on a user's computer and allow a website to recognise that computer. A cookie itself does not contain or collect information and it helps us provide a more user-friendly service.

### Uses for third party cookies

Our partners' cookies are intended to obtain information to help them provide services to VouchFor. For example, third party companies and individuals we engage to provide services to us may track your behaviour on our Platform to market and advertise VouchFor listings or services to you on the Platform and third party websites. Third parties that use cookies and other tracking technologies to deliver targeted advertisements on our Platform and/or third party websites may offer you a way to prevent such targeted advertisements by opting-out at the websites of industry groups such as the Network Advertising Initiative (<http://www.networkadvertising.org/choices/>) and/or the Digital Advertising Alliance (<http://www.aboutads.info/choices/>). You may also be able to control advertising cookies provided by publishers, for example Google's Ad Preference Manager (<https://www.google.com/settings/ads/onweb/>). Please note that even if you choose to opt-out of receiving targeted advertising, you may still receive advertising on the Platform – it just will not be tailored to your interests.

### Disabling Cookies

Most browsers automatically accept cookies, but you can modify your browser setting to decline cookies by visiting the Help portion of your browser's toolbar. If you choose to decline cookies, please note that you may not be able to sign in, customize, or use some of the interactive features of the Platform. Flash cookies operate differently than browser cookies, and cookie management tools available in a web browser will not remove flash cookies. To learn more about how to manage flash cookies, you can visit the Adobe website (<http://www.adobe.com/>) and make changes at the Global Privacy Settings Panel ([http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager02.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager02.html)).

### Changes to this Cookie Policy

We can change this Cookie Policy at any time. If we make material changes to the Cookie Policy, we will let you know either by posting the changed Cookie Policy on the Platform or by sending you an email. It's important that you review the changed Cookie Policy. If you do not wish to agree to the changed Cookie Policy, then we cannot continue to provide the Platform to you, and your only option is to stop accessing the Platform and deactivate your VouchFor account.