



PRIVACY POLICY

Astrana Recruitment Pty Ltd

Effective date: 20/07/2026

1. About this Policy

Astrana Recruitment Pty Ltd (ABN **94 390 395 610**) (“Astrana”, “we”, “us” or “our”) is committed to protecting the privacy of the personal information it collects and handles. This Policy explains how we collect, use, disclose and protect personal information, and how you may access and correct it or make a complaint.

We handle personal information in accordance with the Privacy Act 1988 (Cth) (the “Privacy Act”) and the Australian Privacy Principles (the “APPs”). This Policy applies to candidates, clients, referees, contractors, suppliers and other individuals whose personal information we handle.

2. What personal information we collect

As a recruitment business, the personal information we collect depends on our relationship with you. For candidates, it typically includes:

- name, contact details, and date of birth;
- résumé/CV, employment and education history, qualifications, licences and skills;
- work preferences, availability, and salary or rate expectations;
- visa status, work rights and identification documents;
- reference and background check information;
- attendance, timesheet and clock-in/out records (which may include location-stamped data) provided to us in connection with a placement; and
- bank, superannuation and tax file information (where you are placed or engaged by us).

For clients, referees, suppliers and other contacts, we generally collect name, position, contact details and information relevant to our dealings with you.

3. Sensitive information

Some of the information we collect or that is collected in connection with your placement is “sensitive information” under the Privacy Act, including criminal record and police check information, certain background check information, and biometric information (such as a facial image used for identity verification at a client site check-in — see section 6A below). We collect or handle sensitive information only where it is reasonably necessary for our recruitment and labour-hire functions and, except where the Privacy Act otherwise permits, with your consent.

By providing us with sensitive information, or by consenting to a criminal history or background check, you consent to us collecting, using and disclosing that information for the purposes described in this Policy, including providing it to a prospective employer or client in connection with a role for which you are being considered.

4. How we collect personal information

We collect personal information in a number of ways, including:

- directly from you — when you register with us, submit a résumé, apply for a role, or communicate with us by email or telephone;
- from third parties — such as referees, background and police check providers, and your former or prospective employers, where you have consented or where otherwise permitted; and
- from publicly available sources, such as professional networking or job platforms, where relevant to a role.

Where it is reasonable and practicable, we collect personal information directly from you. If we collect information about you from a third party, we take reasonable steps to ensure you are made aware of the matters set out in this Policy.

5. Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information for purposes connected with our recruitment and labour-hire services, including to:

- assess your suitability for roles and place you with, or refer you to, our clients;
- provide our services to clients seeking to engage candidates;
- conduct reference, background, work-rights and criminal history checks;
- manage placements and engagements, including payroll, timesheet verification, superannuation and related administration;
- maintain our candidate and client databases and contact you about opportunities; and
- comply with our legal obligations.

We may disclose your personal information to prospective employers and clients (in connection with roles for which you are being considered), to referees and background check providers, to our related entities and service providers (such as IT and payroll providers), and to others where required or permitted by law.

6. Disclosure outside Australia

Astrana does not disclose personal information to overseas recipients. Your personal information is held and handled within Australia. If this position changes in the future, we will update this Policy and comply with our obligations under APP 8 in relation to any overseas disclosure.

6A. Site check-in apps and biometric information

Some of our clients require workers on their sites to use a third-party workforce check-in application (such as Connecteam) to clock in and out. Depending on how the client has configured the application, it may collect location data at the time of clock-in and clock-out (and, in some configurations, location data while you are clocked in), and it may capture a facial image or other biometric information to verify your identity at check-in.

These check-in applications are operated by the relevant client and/or the third-party application provider, not by Astrana. The collection, use, storage and disclosure of location and biometric information through those applications is governed by the privacy terms of the client and the application provider, and you should review those terms. Where biometric information is collected, your consent will generally be sought by the client or the application provider at the time you enrol in the check-in system.

Astrana does not control, and does not itself hold, the raw location or biometric data collected through these applications. We do, however, receive attendance and timesheet information derived from the check-in records (which may include location-stamped clock-in and clock-out times) for the purposes of payroll, verifying hours worked, and client billing. We handle that information in accordance with this Policy.

If you have concerns about the use of a client's check-in application, including any biometric feature, please contact us before commencing a placement so we can discuss available options with you and the client.

7. Direct marketing

We may use your personal information to contact you about roles, opportunities and services that may be of interest to you. You may opt out of receiving such communications at any time by contacting us using the details below, and we will give effect to your request.

8. How we hold and protect personal information

We hold personal information in electronic and, where applicable, physical records. We take reasonable steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure, including through access controls and secure storage.

We take reasonable steps to destroy or de-identify personal information when it is no longer needed for any purpose for which it may be used or disclosed, unless we are required by law to retain it.

9. Data breaches

We maintain procedures to respond to actual or suspected data breaches. Where a data breach is likely to result in serious harm to affected individuals, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as required by the Notifiable Data Breaches scheme under the Privacy Act.

10. Access and correction

You may request access to the personal information we hold about you, and ask us to correct it if it is inaccurate, out of date, incomplete, irrelevant or misleading. We will respond to your request within a reasonable period. In limited circumstances we may decline access or correction as permitted by the Privacy Act, in which case we will give you reasons in writing.

11. Complaints

If you have a complaint about how we have handled your personal information, please contact our Privacy Officer using the details below. We will acknowledge your complaint and respond within a reasonable period. If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner at www.oaic.gov.au or on 1300 363 992.

12. How to contact us

For any privacy question, request or complaint, please contact:

Ramsin Kurial, Privacy Officer, Astrana Recruitment Pty Ltd

Email: Ramsin@astranarecruitment.com.au

Phone: 0433 792 901

13. Changes to this Policy

We may update this Policy from time to time. The current version will be available on request and, where applicable, on our website. This Policy was last updated on the effective date shown above.