

## Policy Statement

This privacy policy explains the privacy practices of Australian Concert and Entertainment Security (ACES) (as applicable) ("ACES", "we", "us", and "our")

ACES is committed to protecting any Personal Information that we have collected from you and respecting your privacy. As your privacy is important to us, we strive to be transparent about what ACES will, or will not, do with Employee, Learner or Prospective Employee Data (as defined below) and explain the purposes for processing it.

This Employee Privacy Notice ("Notice") is intended to provide you with information on how we collect, manage, use, process, and share information collected from you when considering you for employment or training opportunities with ACES (including its corporate affiliates), such as when you apply for a position with us or when you express interest in future ACES opportunities by registration of interest or future employment or training or enrolment in training.

We collect and process this data, which can include Personal Data (i.e. information relating to you), in compliance with applicable law. For simplicity, we will refer to this data as "Employment & Training Data."

This Notice does not cover your use of our products or services. To learn more about ACES privacy practices regarding your use of ACES products and services, please see our ACES Privacy Policy.

If you have any questions regarding this privacy policy and/or any other data protection queries relating to ACES please contact [hr@acesecurity.com.au](mailto:hr@acesecurity.com.au).

### How we use your information

This privacy policy applies to information we collect about:

- People that apply for a position at ACES
- People who apply for training related to a position at ACES
- People who enrol in training with ACES.

## Coverage

The policy covers all of ACES' employees including volunteer workers or contractors, or prospective employees, applying for a position, registering interest for future employment, or enrolling in training for employment.

This policy covers all candidates for training at ACES.

## Principles

### 1. Information we Collect

We collect Employment & Training Data about you in connection to employment and related training opportunities with us.

Categories of Employment & Training Data we may collect about you include, but are not limited, to:

- **Contact Information.** We collect your contact information, such as full name, home address, telephone or mobile number, email address or online identifier, job site information (e.g., LinkedIn) and onsite access control information and health declaration information (if you visit us onsite).
- **Government issued ID number or similar identifier.** We collect your identification details, such as citizenship status, residency and work permit status.
- **Employment and Education.** We collect information relating to your employment and education, including your cover letter, resume/CV, work experience or other relevant experience, educational background, and achievements. Where relevant for the position, we may receive information from professional licensing and certification bodies, employment research firms, identity verification services, and educational and training institutions and training registers.
- **Job and Training Preferences.** We collect information related to your job preferences, including career trajectory and interests, and willingness to relocate and/or travel, and your training preferences and interests.
- **References.** We may ask for references from your previous employers, vocational trainers or academic supervisors.
- **Background Checks.** Where permitted or required by law, we conduct background checks once you have accepted a conditional offer from us and including appointment to a position or role during employment, or enrolment in training with us.
- **Mandatory assessments.** We collect information related to any assessment that is mandatory to assess your suitability for the role, such as phone screens, interviews, skills assessments (e.g., competency assessment for a position), and medical/health assessments, including appointment to a position or role during employment, or your suitability for enrolment (e.g. language, literacy and numeracy assessment).
- **Publicly Available Information.** We may collect information you've made public, such as your public profile on career networking sites (e.g., LinkedIn), or employment or training databases.
- **Monitoring of ACES Networks and Resources.** If you visit us onsite, we may collect information relating to on-premise monitoring for security purposes (e.g., video surveillance). If you access and use ACES devices, networks (e.g., corporate wifi), or other resources, we may collect information related to your access and use, such as domain names and IP addresses.
- **Online usage information.** We collect your online usage information when you browse our websites (e.g., our Careers or Training Pages) or use our applicant tracking system, training enrolment, training learning, onboarding, training, human resource management, reporting or communications system platforms, including cookie information, traffic data or profiles, which may be combined with any of the foregoing categories of Employment & Training Data.
- **Biometric data.** We collect biometric data in accordance with our Biometric Privacy Policy.
- **Sensitive Employment & Training Data.** While we treat all Employment & Training Data with care, some Employment & Training Data is more sensitive in nature so we refer to that as "Sensitive Training & Employment Data." Sensitive Training & Employment Data may include information about your racial or ethnic origin, demographics (e.g., age, gender), sexual orientation, veteran status, background check results, biometric data and health data (e.g., disability status, vaccination status). ACES generally collects Sensitive

Employment & Training Data directly from you. However, we may also collect Sensitive Training & Employment Data from background check providers or other agencies (if legally required or permitted).

- **Voluntary Training & Employment Data that you choose to provide us.** In connection to an employment or training opportunity with ACES, you may choose to participate in a voluntary opt-in survey (e.g., applicant or learner or employment experience feedback survey, diversity monitoring survey) or voluntary assessment (e.g., behavioural assessment). These programs are entirely optional and will be communicated as such. If you do choose to participate, we will collect certain information relating to your participation in the program. The types of information we collect and how we will use and share your information will be made clear to you before you decide whether you want to participate in the program.

Voluntary Training & Employment Data will be collected directly from you on a voluntary opt-in basis. Voluntary opt-in basis means:

- It will only be collected if you choose to provide opt-in consent (a separate and specific consent notice will be provided to you);
- You can withdraw your consent at any time (this may not affect processing that has already occurred or Training & Employment Data that has been de-identified); and
- There will be no adverse consequences on your application for not providing Voluntary Training & Employment Data or for withdrawing your consent.
- For Training & Employment Data (including Sensitive Training & Employment Data) that is required to assess your suitability for an employment or training opportunity, please see the Data Retention section on how you can withdraw your application or request deletion at any time.

## 2. How We Collect Data

In relation to your employment or enrolment application with us or your participation in other related activities, we may collect Employment & Training Data about you from the following sources:

- **Directly from you.** We collect Employment & Training Data directly from you, for example when you provide contact details or your resume/CV. You may also choose to voluntarily provide us with Sensitive Employment & Training Data.
- **From referrals.** If you are referred, we collect information from the individual who referred you.
- **From recruitment and staffing partners or other jobs websites.** We collect information from recruitment and staffing partners or other jobs websites (e.g., LinkedIn) if you apply to us through those sources.
- **From references.** We may receive references from your previous employers or academic supervisors.
- **From third party data providers.** We may receive information such as your education, work experience, and contact information from third-party data providers who have the rights to provide us with your information. These providers collect your information from publicly available sources, or through third parties they work with.
- **Professional licensing and certification bodies.** Where it is relevant for the position, we may receive information from professional licensing and certification bodies, employment research firms, identity verification services, and educational and training organisations or institutions.

- **Background check providers.** Where permitted or required by law, we receive background check information from background check providers. Background check providers will provide us with Sensitive Employment & Training Data.
- **From publicly available sources.** We may receive information from other publicly available sources, such as information that you have chosen to make public online (e.g., your public LinkedIn profile).
- **Information we collect automatically.** When you apply online (e.g., through our careers page or training page) or use our employment or training platforms, we collect information sent to us by the device you use, such as your computer IP address, device identifiers and how you arrived at our website. For more information, please see our website notices.

### 3. How We Use Data

ACES strives to be transparent about how Employment and Training Data will be used. When considering you for employment or training opportunities with ACES we use your information for the following purposes:

- **To communicate with you.** Where we have identified you as a potential candidate from information we've collected from public sources or third parties, we use Employment and Training Data to suggest opportunities for you (e.g., reaching out to you for a specific opportunity, inviting you to join a program or apply for another position or course). If you have previously applied for a position or enrolment in a course or program with ACES, we may contact you about future employment or training opportunities that may interest you (i.e., by inviting you to join a training program).
- **To review and process your application.** Where you apply for a position at ACES or to enrol in a course with ACES, we use Employment & Training Data to review and process your application.
- **To assess your suitability.** We use Employment & Training Data to assess your skills, qualifications and interests against our employment or training opportunities.
- **To facilitate the recruiting process or enrolment process.** We use Employment & Training Data to facilitate the recruiting process and the enrolment process including scheduling interviews and communicating with you.
- **For verification.** We use Employment & Training Data to verify the information you or others provide, and to check your references. Where permitted or required by law, we use Employment & Training Data to conduct background checks if you are offered the role, including in accordance with ACES Background Check Policy.
- **To reimburse you.** We use Employment & Training Data to reimburse you for any agreed expenses and travel.
- **To evaluate and improve our processes.** We use Employment & Training Data to evaluate our recruitment processes and activities, our training processes and activities, including assessing interview scheduling times and time to hire and onboard and time to enrol and complete.
- **For reporting.** We use Employment & Training Data to analyse recruiting metrics for aggregated reporting (e.g., assessing the efficiency of our recruiting processes and our training completion results).
- **To protect ACES's interests.** We use Employment & Training Data to protect our interests, which may include protecting our legal rights and maintaining the security and integrity of our facilities, equipment and electronic platforms.

- **As legally required.** We use Employment & Training Data as legally required, such as confirming your eligibility to work in the country in which you applied for a job or to conduct background checks.
- **For other purposes with your consent.** If you voluntarily choose to participate in an optional program, we will use Voluntary Employment & Training Data according to any purposes provided to you during the opt-in process.
- **Legal Bases for Individuals Located in the EEA, UK, or Brazil** If you are based in the European Economic Area (EEA), UK, or Brazil, we collect and process Employment & Training Data only where we have legal bases for doing so under applicable laws. The legal bases depend on the type of Employment & Training Data and the purpose we process it. This means we collect and process Talent Data only where:
  - We need it to administer a contract with you;
  - It satisfies a legitimate interest which is not overridden by your privacy rights (e.g., assessing your suitability, evaluating our recruiting processes, protecting our legal rights and interests);
  - You provide us consent for a specific purpose (e.g., diversity monitoring); or
  - We need to comply with a legal obligation (e.g., conducting legally required background checks).

#### 4. Withdraw Consent

If you have consented to our use of Employment & Training Data for a specific purpose, you have the right to withdraw your consent, but this may not affect any processing that has already taken place or Employment & Training Data that has been de-identified. Where we are using Employment & Training Data because we have a legitimate interest to do so, you have the right to object to that use.

ACES also shares Employment & Training Data within the ACES group of associated companies for the purposes described in this section.

#### 5. How We Share Information Outside of ACES

ACES will share your Employment & Training Data outside of ACES and its associated companies and for clients we provide your services to for the purposes defined above, including:

- **To facilitate the recruitment and enrolment process.** We share Employment & Training Data to facilitate the recruitment process, such as with service providers (e.g., applicant tracking system provider, onboarding and human resources system providers, training system providers, background check providers) and with third parties with your consent (e.g., references you provide us).
- **Service providers on our behalf.** We share Employment & Training Data with service providers who perform necessary duties and functions on our behalf (e.g., our applicant tracking system), which means they typically can only use your Employment & Training Data to provide services to ACES and cannot use any identifying information for their own independent purposes.
- **Clients.** We share Employment & Training Data with clients to facilitate approvals, authorisations and ongoing registration to perform the position, duties and functions on our behalf at a client worksite.
- **External reports.** We share aggregated and de-identified Employment & Training Data in our external (i.e. public) reports, such as our WGEA report or Corporate Social Responsibility report.

- **As legally required.** We may share Employment & Training Data with a third party (e.g., courts, law enforcement agencies) if we have a good faith belief that it is required or permitted under applicable law, including to meet national security or law enforcement requirements, to protect ACES or its affiliates, or to respond to a valid court order, subpoena, discovery request, search warrant, or other law enforcement request.

## 6. How We Transfer Information We Collect

ACES transfers and processes most data within Australia.

ACES and its associated companies may transfer information internationally, and outside your country of residence. When ACES transfers your Employment & Training Data to another country, it will ensure that the transfer complies with applicable law.

## 7. Transferring Information to Third Parties

ACES is responsible for the processing of Personal Data it receives and subsequently transfers to a third party acting on ACES's behalf (i.e. service providers or clients). Please refer to How we share information at Section 5 for more information on how ACES shares Personal Data with third parties.

- ACES will enter into contracts to ensure that any third parties to whom Personal Data may be disclosed is aware of and adheres to or is subject to law providing the same level of privacy protection as is required by law and has agreed to provide an adequate level of privacy protection.
- The storage by ACES of Personal Data on servers and/or on software made available or hosted by third parties shall not be considered disclosures of Personal Data to a third party so long as the third party does not have direct access to the Personal Data stored or hosted. In all events, ACES shall ensure by contract that any such third party has contractual safeguards in place to protect the Personal Data.
- ACES may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## 8. Your Rights and Choices

Please refer to Withdraw Consent (section 4) for information on how to access, correct, or delete your Personal Data. Please note that there may be limitations where (i) the burden or expense of providing access would be disproportionate to the risks to your privacy (ii) requests are manifestly abusive, based on unreasonable intervals or their number or repetitive or systematic nature, or (iii) the rights of other persons would be violated.

## 9. Questions or Complaints

If you have questions or a complaint, please contact [privacy@acesecurity.com.au](mailto:privacy@acesecurity.com.au).

## 10. Retention of Information We Keep

We will retain Employment & Training Data no longer than necessary to carry out the purposes provided in this Notice (or any other applicable notice), and as required or permitted under applicable law.

**If you are offered and accept a role with ACES:** We will retain your information in order to manage your employment or training with us, and we will provide other privacy policies and notices that will apply to ACES.

**If your application is not successful (or you withdraw or decline our offer):** We will retain your information for the purposes provided in this Notice, such as to keep you in mind for current or future roles, to help us evaluate

and improve our recruitment and enrolment processes, and for record-keeping. If you'd rather we didn't keep your information on file, please let us know by following the process in Section 11

**11. How to Access and Control Your Information**

**Access and update your information:** Depending on applicable law, you may request a copy of your personal data that we hold, and we will provide it to you in a commonly-used electronic format. If the information about you is incorrect or out of date, you may ask us to update it, but this may not affect your application if we have already filled the position or assessed your candidacy based on the information originally provided.

**Request that we stop using or delete your information:** If you would no longer like to be considered for a position or enrolment you may withdraw your application at any time. You may also ask us to delete your personal data. However, we will retain certain personal data we are legally required to retain, such as for record-keeping purposes.

**To make a request,** please contact us at [privacy@acesecurity.com.au](mailto:privacy@acesecurity.com.au). If you feel we have not adequately addressed your privacy concerns, you may have the right to contact a data protection authority where you live, work or feel your rights were infringed.

**12. Changes to our Privacy Policy**

From time to time, we may update this privacy policy to reflect new or different privacy practices.

We will place a notice online when we make material changes to this privacy policy so that you are always aware of what information we collect, how we use it and under what circumstances we disclose it. Please ensure that you read this privacy policy regularly.

The effective date of this policy is at the bottom of the policy.

**Defined Terms**

1. Personal Information as that term is defined in section 6 (1) the Privacy Act 1988.
2. Activity is classified as;
  - Visit to ACES website and the completion of any forms
  - Contact with ACES teams via telephone or email
  - Access to any ACES related employment or training website including apps.
  - Completion of an ACES survey
  - Attendance at an ACES event
  - Engagement via ACES social media platform (Facebook, Twitter and LinkedIn)

**Approval and Version Control**

Version # : V11  
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