

# BrightSteps Recruitment

## Privacy Policy

*Last Updated: January 2026*

**Our Commitment:** BrightSteps Recruitment is committed to protecting your privacy and handling your personal information in accordance with the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth).

### 1. About This Privacy Policy

---

This Privacy Policy explains how BrightSteps Recruitment collects, uses, discloses, and safeguards your personal information. It applies to all individuals who interact with us, including job candidates, employees, contractors, clients, and website visitors.

**BrightSteps Recruitment** is an Australian-owned workforce solution provider based in West Tamworth, NSW, led by Director Edwin Ngetich. We specialize in Industrial Labour-Hire and Community Care sectors.

### 2. What Personal Information We Collect

---

#### 2.1 Job Candidates and Employees

We may collect the following types of personal information:

- **Identity Information:** Full name, date of birth, gender, photograph
- **Contact Information:** Address, phone number, email address
- **Professional Information:** Resume/CV, employment history, qualifications, certifications, references
- **Financial Information:** Bank account details, tax file number, superannuation details
- **Background Checks:** Police checks, working with children checks, professional licenses
- **Health Information:** Medical certificates, pre-employment health assessments (where legally required for specific roles)
- **Right to Work:** Visa status, citizenship information, passport details

#### 2.2 Client Organizations

- Business contact information
- Organization details and requirements
- Billing and payment information
- Service preferences and feedback

### 2.3 Website Visitors

- IP address and browser information
- Pages visited and time spent on site
- Referring website information
- Cookie data (see Section 8)

## 3. How We Collect Personal Information

---

We collect personal information through various means, including:

- Directly from you via application forms, registration, interviews, and correspondence
- From third parties such as referees, previous employers, and screening service providers
- From publicly available sources including professional networking sites
- Through our website and online portals
- During the course of providing our services

## 4. Why We Collect and Use Your Information

---

### 4.1 Primary Purposes

We collect and use your personal information for the following purposes:

- **Recruitment Services:** Matching candidates with suitable employment opportunities
- **Employment Management:** Managing employment relationships, payroll, and workplace obligations
- **Client Services:** Providing workforce solutions to our client organizations
- **Compliance:** Meeting legal and regulatory requirements including workplace health and safety, tax, and employment law

- **Communication:** Contacting you about job opportunities, appointments, and service updates
- **Assessment:** Evaluating suitability for positions and conducting background checks
- **Administration:** Managing our business operations and maintaining records

## 4.2 Secondary Purposes

- Improving our services and website functionality
- Marketing our services (with your consent)
- Research and analysis to enhance our recruitment processes
- Protecting against fraud and maintaining security

# 5. Disclosure of Personal Information

---

## 5.1 When We Share Your Information

We may disclose your personal information to:

- **Client Organizations:** Potential and actual employers for recruitment and placement purposes
- **Service Providers:** Background check companies, medical assessors, payroll processors, IT service providers
- **Referees:** Individuals you have nominated as references
- **Professional Advisors:** Lawyers, accountants, and business consultants
- **Government Agencies:** When required by law or to comply with legal obligations
- **Emergency Services:** In situations involving health and safety concerns

## 5.2 Overseas Disclosure

We generally do not disclose personal information overseas. If circumstances require international disclosure, we will ensure appropriate safeguards are in place and obtain your consent where required by law.

**Important:** We will never sell your personal information to third parties for marketing purposes.

# 6. Data Security and Storage

---

## 6.1 Security Measures

We take reasonable steps to protect your personal information from:

- Misuse, interference, and loss
- Unauthorized access, modification, or disclosure
- Cyber threats and data breaches

Our security measures include:

- Secure encrypted databases and storage systems
- Access controls and authentication requirements
- Regular security audits and updates
- Staff training on privacy and data protection
- Physical security for paper-based records

## 6.2 Data Retention

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, comply with legal obligations, and resolve disputes. Generally:

- Employee records: 7 years after employment ends
- Candidate records: Up to 2 years after last contact (unless you request earlier deletion)
- Financial records: 7 years as required by taxation law

# 7. Your Privacy Rights

---

## 7.1 Access and Correction

You have the right to:

- **Access:** Request access to the personal information we hold about you
- **Correction:** Request correction of inaccurate or incomplete information
- **Update:** Update your contact details and preferences at any time

## 7.2 Additional Rights

- **Withdraw Consent:** Withdraw consent for marketing communications or specific data uses

- **Anonymity:** Deal with us anonymously where practicable (though this may limit our ability to provide services)
- **Complaints:** Lodge a complaint about our handling of your personal information

### 7.3 How to Exercise Your Rights

To access, correct, or update your information, or to make a privacy-related inquiry, please contact our Privacy Officer using the details in Section 11.

## 8. Cookies and Website Analytics

---

Our website may use cookies and similar technologies to:

- Enhance user experience and website functionality
- Analyze website traffic and usage patterns
- Remember your preferences and settings

You can control cookie settings through your browser. However, disabling cookies may affect website functionality.

## 9. Sensitive Information

---

We only collect **sensitive information** (such as health information, criminal records, or information about racial or ethnic origin) when:

- You have provided consent
- It is required or authorized by law
- It is necessary for specific job requirements (e.g., health assessments for safety-critical roles)

Sensitive information is handled with extra care and subject to stricter security measures.

## 10. Changes to This Privacy Policy

---

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. The updated policy will be posted on our website with a revised "Last Updated" date. We encourage you to review this policy periodically.

## 11. Contact Us & Privacy Complaints

---

### Privacy Officer

If you have questions, concerns, or complaints about our privacy practices, please contact:

### BrightSteps Recruitment

Attention: Privacy Officer

West Tamworth, NSW, Australia

**Director:** Edwin Ngetich

### Complaint Resolution Process:

1. Submit your complaint in writing to our Privacy Officer
2. We will acknowledge receipt within 7 business days
3. We will investigate and respond within 30 days
4. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC)

### Office of the Australian Information Commissioner (OAIC)

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

Phone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## 12. Consent

---

By providing your personal information to BrightSteps Recruitment and using our services, you consent to the collection, use, and disclosure of your information as described in this Privacy Policy.

© 2026 BrightSteps Recruitment. All rights reserved.

Committed to Privacy Protection under Australian Privacy Principles