PRIVACY POLICY

First Grade Group Pty Ltd and its related bodies corporate

1. Purpose of this Policy

This Privacy Policy explains how First Grade Group Pty Ltd (ACN 154 150 508) and its related bodies corporate (collectively referred to as "First Grade", "we", "us" or "our") collect, hold, use and disclose personal information in the course of conducting our business.

First Grade is a recruitment, labour hire and workforce solutions organisation. We provide recruitment services, source and place candidates, engage workers for labour hire assignments and provide workforce-related services to our clients across a range of industries and business streams.

In carrying out these activities, we collect and handle personal information relating to job applicants, prospective candidates, employees, labour hire workers, contractors, clients, prospective clients, business representatives, referees and other individuals with whom we interact.

We recognise the importance of protecting personal information and are committed to handling it responsibly and in accordance with the Privacy Act 1988 (Cth) (Privacy Act), the Australian Privacy Principles (APPs) and other applicable privacy laws.

This Policy explains:

1. The types of personal information we collect and hold.
2. How and why we collect personal information.
3. How we hold, use and disclose personal information.
4. How we protect personal information.
5. Whether personal information may be disclosed to overseas recipients.
6. How individuals may access and correct their personal information.
7. How privacy complaints may be made and how we deal with them.
8. How we use automated software and artificial intelligence in our recruitment activities.

This Policy applies to personal information handled by First Grade in connection with its business activities.

2. Our Commitment to Privacy

We are committed to managing personal information in an open, transparent and responsible manner.

We take reasonable steps to ensure that personal information is:

- Collected by lawful and fair means.
- Relevant to, and reasonably necessary for, our business activities.
- Accurate, complete and up to date where required.
- Used and disclosed only for its intended purposes or as otherwise permitted by law.
- Protected against misuse, interference, loss and unauthorised access, modification or disclosure.
- Retained only for as long as required for legitimate business, legal or regulatory purposes.

We maintain internal practices and procedures designed to support compliance with our privacy obligations. These include staff awareness, appropriate access controls, information security measures and procedures for managing privacy enquiries and complaints.

Our Privacy Policy is available on our website and a copy can be provided upon request.

3. What Personal Information We Collect and Hold

The type of personal information we collect depends on the nature of our dealings with an individual and the services being provided.

3.1 Job Applicants and Prospective Candidates

In connection with recruitment and candidate registration, we may collect and hold information including:

- Full name, residential address and contact details.
- Date of birth.
- Resume, employment history and work experience.
- Educational qualifications, training and professional development.
- Trade qualifications, licences, tickets, certificates and accreditations.
- Skills, experience and areas of competency.
- References and referee contact details.
- Employment preferences, availability and work location preferences.
- Australian work rights, visa status and relevant visa conditions.
- Results of relevant background, identity, licence and employment verification checks.
- Information required to assess suitability for particular positions or assignments.

3.2 Employees and Labour Hire Workers

Where an individual is employed or engaged by First Grade, we may collect and hold information necessary to administer their employment or engagement, including:

- Employment contracts, engagement details and employment history.
- Payroll, remuneration and banking information.
- Taxation and superannuation details.
- Timesheets, attendance records and hours worked.
- Leave applications and records.
- Emergency contact details.
- Training, competency and induction records.
- Performance, conduct and disciplinary records where relevant.
- Workplace health and safety information.
- Incident, injury and workers compensation information.
- Information required to manage assignments, client requirements and employment obligations.

3.3 Clients and Business Contacts

In dealing with our clients, suppliers and other business contacts, we may collect:

- Names, business addresses, telephone numbers and email addresses.
- Job titles, positions and responsibilities.
- Business and contractual correspondence.
- Information relating to recruitment requirements and workforce needs.
- Purchase orders, timesheets, invoicing and payment information.

- Records of business dealings and communications.

3.4 Referees and Other Third Parties

Where individuals provide references or information in support of a candidate's application, we may collect:

- Names and contact details.
- Employment and professional relationships with the candidate.
- Information concerning the candidate's employment history, experience, skills and suitability.
- Other relevant information voluntarily provided during the reference process.

3.5 Sensitive Information

In certain circumstances, we may need to collect sensitive information, as defined under the Privacy Act.

Depending on the position, assignment or legal requirements, this may include:

- Health information and medical assessments.
- Information relating to workplace injuries or medical restrictions.
- Criminal history information and police check results.
- Membership of professional or trade associations.
- Other sensitive information relevant to a particular role or engagement.

Police checks may be undertaken where required by a client, relevant to a particular position or assignment, or otherwise necessary for a legitimate recruitment or employment purpose.

Medical assessments are not routinely required. They may be arranged where requested by a client or where necessary to assess an individual's fitness to undertake the inherent requirements of a particular position or assignment, subject to applicable legal requirements.

We will only collect sensitive information where it is reasonably necessary for our functions or activities and where permitted by law. Where required, we will obtain the individual's consent before collecting such information.

We will not routinely collect sensitive information that is unrelated to the requirements of a position, assignment or legitimate business activity.

3.6 Government and Identification Information

Where necessary, we may collect identification and government-related information such as:

- Tax File Numbers.
- Passport and visa information.
- Driver licence details.
- Proof of identity and work rights.
- Medicare details where lawfully required.
- Other identification information required for employment, payroll, compliance or verification purposes.

We routinely undertake Visa Entitlement Verification Online (VEVO) checks for Working Holiday Makers (WHMs) to verify their visa status, work rights and any applicable visa conditions.

We may also undertake work-rights and visa verification checks for other individuals where required to establish or confirm their eligibility to work in Australia.

Government-related identifiers will be handled in accordance with applicable legal requirements and will not be used as general identification numbers.

4. How We Collect Personal Information

We generally collect personal information directly from the individual concerned.

This may occur through:

- Online applications and candidate registration forms.
- Resumes and employment applications.
- Interviews and telephone conversations.
- Emails, text messages and other correspondence.
- Employment contracts and onboarding documentation.
- Timesheets and assignment records.
- Medical, competency and induction processes.
- Client registration and account documentation.
- Our website and other online platforms.

In some circumstances, we may also collect personal information from third parties, including:

- Referees and previous employers.
- Clients and prospective employers.
- Recruitment platforms and employment websites.
- Educational institutions and training providers.
- Licensing and accreditation bodies.
- Background screening and verification providers.
- Government departments and regulatory authorities.
- Other individuals or organisations authorised to provide information.

We may also collect information from publicly available sources where it is reasonably necessary for our recruitment or business activities and permitted by law.

Where we collect personal information from a third party, we will take reasonable steps to notify the individual of the collection and relevant circumstances, as required by the Privacy Act.

5. Identification and Anonymity

Individuals may, where lawful and practicable, choose to deal with us without identifying themselves or by using a pseudonym.

However, due to the nature of recruitment, employment and labour hire services, it will generally be necessary for individuals to identify themselves before we can assess their suitability for employment, arrange an assignment, establish an employment relationship or administer payroll and other employment obligations.

If an individual chooses not to provide information reasonably required for these purposes, we may be unable to provide the requested recruitment, employment or labour hire services.

6. Why We Collect and Hold Personal Information

We collect and hold personal information for purposes directly related to our recruitment, labour hire, workforce management and business activities.

These purposes include:

6.1 Recruitment and Candidate Management

- Receiving and assessing employment applications.
- Registering and maintaining candidate profiles.
- Assessing qualifications, skills, experience and suitability for positions.
- Conducting interviews and reference checks.
- Verifying employment history, qualifications, licences and tickets.
- Verifying identity and Australian work rights.
- Conducting police checks and other relevant background screening where required.
- Arranging medical assessments where requested or required for a particular position or assignment.
- Identifying and matching suitable candidates to employment opportunities.
- Maintaining candidate databases for current and future recruitment opportunities.
- Communicating with candidates about available positions and recruitment outcomes.

6.2 Labour Hire and Employment Services

- Engaging and employing workers.
- Arranging and administering labour hire assignments.
- Providing candidate information to clients for consideration for employment or assignments.
- Coordinating worker placements, commencements and transfers.
- Managing attendance, timesheets and hours worked.
- Administering wages, payroll, taxation and superannuation.
- Managing employment contracts and other employment documentation.
- Arranging inductions, training and competency assessments.
- Monitoring assignment requirements and worker performance where relevant.
- Managing workplace health and safety matters and incident reporting.
- Administering workers compensation and insurance matters where applicable.
- Meeting employment, industrial relations and workplace compliance obligations.

6.3 Client and Business Administration

- Establishing and maintaining client relationships.
- Understanding and responding to client workforce requirements.
- Providing recruitment and labour hire services.
- Preparing quotations, proposals and service agreements.
- Managing contractual arrangements.
- Processing timesheets, purchase orders and invoices.
- Managing accounts receivable and payable.
- Maintaining business records.
- Responding to client enquiries and resolving disputes.
- Managing supplier and service provider relationships.

6.4 Legal and Regulatory Compliance

- Complying with applicable Australian laws and regulations.
- Meeting employment, taxation, workplace health and safety and superannuation obligations.

- Responding to lawful requests from government departments, regulators and law enforcement agencies.
- Maintaining records required by law.
- Establishing, exercising or defending legal claims.
- Investigating complaints, incidents, suspected fraud or misconduct.

6.5 Internal Business Operations

- Managing and administering our business.
- Training and educating employees.
- Improving recruitment and workforce management processes.
- Maintaining information technology systems.
- Conducting internal reporting, auditing and quality assurance.
- Evaluating and improving the services we provide.

We will not collect personal information merely because it may be useful at some future time. Collection must be reasonably necessary for our functions or activities or otherwise permitted by law.

7. How We Use and Disclose Personal Information

We will generally use and disclose personal information for the purpose for which it was collected, for a related purpose that an individual would reasonably expect, with the individual's consent, or where otherwise permitted or required by law.

Depending on the nature of our business dealings with an individual, we may disclose personal information to the following parties.

7.1 Clients and Prospective Employers

In providing recruitment and labour hire services, we may disclose relevant candidate information to our clients and prospective employers for the purpose of considering candidates for employment or assignments.

This may include:

- Resumes and employment histories.
- Qualifications, licences, tickets and certificates.
- Skills, experience and competency information.
- Relevant work availability.
- References and employment verification information.
- Other information reasonably necessary to assess suitability for a particular position or assignment.

We will endeavour to limit disclosures to information relevant to the position or assignment and will obtain consent where required.

7.2 Payroll and Employment Service Providers

We may disclose relevant personal information to organisations that assist us with:

- Payroll processing.
- Taxation and superannuation administration.
- Employment and human resources management.
- Time and attendance systems.

- Recruitment and candidate management systems.
- Information technology and data storage.
- Other employment administration services.

7.3 Government Departments and Regulatory Authorities

Where necessary or required by law, we may disclose personal information to government departments and authorities, including:

- The Australian Taxation Office.
- The Department of Home Affairs.
- Fair Work Ombudsman and the Fair Work Commission.
- Workplace health and safety regulators.
- Workers compensation authorities and insurers.
- Superannuation funds and relevant administrators.
- Law enforcement agencies.
- Courts and tribunals.
- Other government or regulatory bodies with lawful authority to request the information.

7.4 Insurers and Professional Advisers

We may disclose relevant information to:

- Workers compensation and public liability insurers.
- Insurance brokers.
- Solicitors and legal representatives.
- Accountants and auditors.
- Professional advisers and consultants.

Such disclosures may be necessary for insurance claims, legal proceedings, employment matters, business administration or the protection of our legitimate business interests.

7.5 Other Disclosures

We may also disclose personal information:

- To referees or previous employers where relevant to recruitment and verification processes.
- To training providers and assessment organisations where required for a position or assignment.
- To emergency services where necessary to protect an individual's health or safety.
- In connection with a business restructure, merger, acquisition or sale, subject to applicable privacy requirements.
- Where the individual has consented to the disclosure.
- Where disclosure is required or authorised by Australian law.
- Where a permitted general or emergency situation under the Privacy Act applies.

We do not routinely disclose candidate or worker personal information to unrelated third parties for their own marketing purposes.

8. Automated Decision-Making and Artificial Intelligence (AI)

We may use automated software and artificial intelligence (AI) tools to assist with the delivery of our recruitment and labour hire services.

These tools are not necessarily used for every position or candidate and are utilised where appropriate for specific recruitment activities.

Depending on the system and the position involved, these tools may process personal information contained in an individual's application or candidate profile, including:

- Resume and employment history.
- Skills, qualifications and experience.
- Trade licences, tickets and accreditations.
- Work history and availability.
- Other information relevant to the requirements of a particular position.

These tools may assist our recruitment consultants by analysing information, identifying relevant skills, filtering applications, ranking candidates and preparing shortlists of potentially suitable candidates for further consideration.

The purpose of using these tools is to assist our recruitment consultants in identifying candidates who may be suitable for particular positions or assignments and to improve the efficiency of the recruitment process.

AI tools do not independently make final recruitment or employment decisions on behalf of First Grade.

Recruitment consultants and, where applicable, authorised representatives of our clients are responsible for assessing candidate suitability and making the final decisions regarding candidate progression, shortlisting, submission to clients, selection and placement.

Automated tools are used to support the recruitment process and do not replace the professional assessment and decision-making responsibilities of our recruitment consultants or clients.

The kinds of decisions that may be informed by these tools include the assessment of candidate suitability, progression through recruitment stages and shortlisting for particular assignments.

Where a computer program is used to make, or substantially and directly assist in making, a decision that could reasonably be expected to significantly affect an individual's rights or interests, we will provide the additional information required by the Australian Privacy Principles. This includes information about the types of personal information used and the kinds of decisions made or assisted by those programs.

We will continue to review our use of automated tools to ensure that our practices remain consistent with applicable privacy requirements.

9. Cookies and Website Information

When individuals visit our website, certain technical information may be collected automatically.

Our website may use cookies, which are small text files stored on a computer or mobile device through an internet browser. Cookies may be used to support website functionality, remember certain preferences and assist with the operation of the website.

Individuals may adjust their browser settings to disable or restrict cookies. However, doing so may affect certain website functions or features.

First Grade does not routinely use website tracking technologies to monitor visitors' browsing activities or create individual browsing profiles.

10. How We Hold and Protect Personal Information

We may hold personal information in electronic or physical form.

Electronic information may be stored in our internal information technology systems, recruitment databases, payroll systems, cloud-based platforms and other business applications.

Physical information may be held in employment files, recruitment records, contracts, correspondence and other business documents.

We take reasonable steps to protect personal information against misuse, interference, loss, unauthorised access, modification or disclosure.

These steps may include:

- Password protection and user access controls.
- Restricting access to personal information to authorised personnel.
- Network and system security measures.
- Firewalls, anti-virus protection and other technical safeguards.
- Physical security measures for documents and records.
- Staff training and confidentiality requirements.
- Appropriate security requirements for external service providers.
- Procedures for identifying and responding to suspected privacy breaches.

While we take reasonable steps to protect personal information, no method of electronic storage or transmission can be guaranteed to be completely secure.

11. Retention and Destruction of Personal Information

We retain personal information for as long as it is reasonably necessary for the purposes for which it was collected, including recruitment, employment administration, labour hire operations, contractual obligations, legal requirements and legitimate business recordkeeping.

Different types of information may be subject to different retention periods under applicable laws and regulatory requirements.

Where personal information is no longer required and there is no legal or other legitimate reason to retain it, we will take reasonable steps to destroy or de-identify the information securely.

Where we receive personal information that we did not solicit, we will determine whether we could have collected that information under the Privacy Act. If not, and it is lawful and reasonable to do so, we will destroy or de-identify the information as soon as practicable.

12. Disclosure of Personal Information Overseas

Based on our current knowledge, First Grade does not routinely disclose personal information to overseas recipients as part of its ordinary recruitment and labour hire operations.

We may use third-party service providers to support our recruitment, employment, payroll, information technology and business administration activities. We will take reasonable steps to understand where personal information is stored and processed by these providers.

Should our arrangements change and personal information be disclosed to an overseas recipient, we will handle that disclosure in accordance with the Privacy Act and applicable Australian Privacy Principles, including taking reasonable steps to ensure that the overseas recipient handles personal information appropriately.

13. Access to Personal Information

Individuals have the right to request access to personal information that First Grade holds about them, subject to applicable legal exceptions.

Requests for access should be made in writing or by email to our Privacy Officer using the contact details set out in this Policy.

We will take reasonable steps to respond to access requests within a reasonable period, ordinarily within 30 days where practicable.

Before providing access, we may need to verify the identity of the person making the request to ensure that information is not disclosed to an unauthorised person.

We will generally provide access in the manner requested where it is reasonable and practicable to do so.

There is ordinarily no charge for making an access request. However, we may charge a reasonable administrative fee for providing access where permitted by law. We will advise the individual of any applicable charge before proceeding.

In certain circumstances, we may refuse access to personal information where permitted or required by law. These circumstances may include where:

- Providing access would pose a serious threat to the life, health or safety of an individual or to public health or safety.
- Providing access would have an unreasonable impact on the privacy of other individuals.
- The request is frivolous or vexatious.
- The information relates to existing or anticipated legal proceedings and would not be accessible through normal discovery procedures.
- Providing access would prejudice negotiations or reveal commercially sensitive information.
- Access is required to be refused by law or a court or tribunal order.
- Providing access would be likely to prejudice an investigation or enforcement-related activity.
- Another exception under the Privacy Act applies.

If we refuse an access request, we will provide written reasons for the refusal where required and explain the individual's available complaint mechanisms.

14. Correction of Personal Information

We take reasonable steps to ensure that personal information we hold is accurate, up to date, complete and relevant for the purposes for which it is used.

If an individual believes that personal information held by First Grade is inaccurate, out of date, incomplete, irrelevant or misleading, they may request that it be corrected.

Requests for correction should be made to our Privacy Officer using the contact details set out in this Policy.

We will investigate correction requests and take reasonable steps to correct the information where appropriate.

We will endeavour to respond to correction requests within 30 days where practicable. If additional time is required, we will advise the individual.

If we refuse to make a requested correction, we will provide written reasons where required by law and explain the available complaint mechanisms.

15. Privacy Complaints

We take privacy concerns seriously.

If an individual believes that First Grade has mishandled their personal information or breached its obligations under the Privacy Act or Australian Privacy Principles, they may lodge a complaint with our Privacy Officer.

Complaints should include sufficient information to allow us to investigate the matter, including the nature of the concern and any relevant supporting information.

Upon receiving a complaint, we will:

1. Acknowledge receipt as soon as practicable.
2. Review the circumstances and investigate the complaint.
3. Obtain further information where necessary.
4. Take appropriate steps to address the complaint where a breach or deficiency is identified.
5. Provide a response within a reasonable period, ordinarily within 30 days where practicable.

If an individual is not satisfied with our response or the manner in which their complaint has been handled, they may lodge a complaint with the Office of the Australian Information Commissioner (OAIC).

Office of the Australian Information Commissioner

Website: www.oaic.gov.au

Telephone: 1300 363 992

Postal address: GPO Box 5218, Sydney NSW 2001.

16. Privacy Officer Contact Details

All privacy enquiries, access requests, correction requests and complaints should be directed to:

The Privacy Officer
First Grade Group Pty Ltd
1/37 Manilla Street
East Brisbane QLD 4169

Telephone: (07) 3172 2250

Email: brad.watts@firstgrade.com.au

17. Changes to this Privacy Policy

We may review and update this Privacy Policy from time to time to reflect changes in our business operations, information handling practices, technology or applicable laws.

The current version will be made available on our website.

We encourage individuals to review this Policy periodically to remain informed about how First Grade manages personal information.

First Grade Group Pty Ltd
Last updated: November 2026