



PRIVACY POLICY

FrameWork Recruitment Limited

DOCUMENT OWNER	Director	REVIEW FREQUENCY	Annual
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1. Purpose

- 1.1 FrameWork Recruitment Limited (FrameWork) is committed to protecting the privacy of candidates, employees, temporary workers, contractors, clients and other individuals we deal with. This policy explains how FrameWork will collect, use, store, disclose and protect personal information in accordance with the Privacy Act 2020 and applicable New Zealand privacy requirements.

2. Scope

- 2.1 This policy applies to personal information handled by FrameWork in connection with recruitment, labour hire, employment, payroll, client services, business development and the administration of our business. It applies to FrameWork employees and anyone authorised to handle information on FrameWork's behalf.

3. Information FrameWork May Collect

- 3.1 Depending on the nature of our relationship with an individual, FrameWork may collect personal information necessary for our business purposes in connection with employment including:
- (a) name, contact details, address and identification information;
 - (b) CVs, employment history, qualifications, licences, tickets, skills and availability;
 - (c) information provided during interviews, applications and candidate registration;
 - (d) reference information and employment verification;
 - (e) information required for lawful pre-employment or employment checks, including Ministry of Justice, driver licence and other checks where relevant and authorised;
 - (f) drug and alcohol screening information where testing is lawful, relevant and undertaken in accordance with FrameWork's policies and procedures;
 - (g) health and safety information relevant to an individual's work, including incidents, injuries, hazards, inductions, PPE and site-safety records;
 - (h) bank, tax, KiwiSaver, payroll and employment information required to administer employment and payments;
 - (i) client contact information, communications, service history and commercial information; and
 - (j) information generated through its CRM, payroll, timesheet, email, website and other business systems.
- 3.2 By applying for and/or accepting employment with FrameWork, you agree to FrameWork's use and disclosure of your personal information in accordance with this policy and the Privacy Act.
- 3.3 Any queries about personal information should be directed to the employee's relevant FrameWork contact person.

4. How FrameWork Collects Information

- 4.1 Where practical, FrameWork will collect personal information directly from the individual concerned. Individuals should provide information that is accurate and up to date and tell FrameWork if relevant information changes.
- 4.2 FrameWork may collect publicly available information about individuals, including personal information posted online. Individuals will be asked to confirm the accuracy of this information before it is used or disclosed.
- 4.3 FrameWork may also receive information indirectly through third parties, including referees, previous employers, clients or host businesses, government agencies, screening providers, publicly available sources and other third parties where the individual has authorised the collection or where collection is otherwise permitted by law.
- 4.4 If FrameWork collects personal information indirectly through a third party, unless an exception under the Privacy Act 2020 applies, it will take reasonable steps to ensure that the individual concerned is aware of:
- (a) the fact that the information has been collected;
 - (b) the purpose of the collection;
 - (c) the intended recipients of the information;
 - (d) the name and address of the agency that is collecting the information and the agency that holds the information;
 - (e) if the collection is authorised or required by law, which particular law; and
 - (f) their rights of access to, and correction of, their information.
- 4.5 FrameWork will make every effort to ensure that any personal information collected is accurate, up to date, complete, and relevant to the purpose for which it was collected.



5. Why FrameWork Uses Personal Information

5.1 FrameWork may use personal information to:

- (a) assess suitability for employment or assignments;
- (b) match candidates with vacancies and client requirements; present candidates to prospective clients with appropriate authority;
- (c) undertake authorised checks;
- (d) establish and manage employment relationships;
- (e) administer payroll, timesheets and invoicing;
- (f) meet health and safety obligations;
- (g) manage performance, conduct and employment matters;
- (h) communicate with candidates, workers and clients; provide recruitment services;
- (i) maintain business records;
- (j) meet legal, regulatory and contractual obligations; and/or
- (k) any other reason in accordance with the Privacy Act 2020.

6. Disclosure of Information

- 6.1 FrameWork may disclose relevant personal information to third parties - including clients or prospective host businesses, referees, screening providers, payroll and technology providers, professional advisers, insurers, regulators or government agencies - where this is reasonably necessary for the purpose for which the information was collected, the individual has authorised the disclosure, or disclosure is otherwise permitted or required by law.
- 6.2 FrameWork will take reasonable steps to ensure that only information relevant to the particular purpose is disclosed.
- 6.3 Candidate information will not be provided to a prospective employer or host client simply for convenience; appropriate candidate authority and privacy obligations must be observed.
- 6.4 FrameWork staff shall not disclose any personal information about another FrameWork staff member or client in the course of their employment or otherwise which is inconsistent with the provisions of the Privacy Act.

7. Recruitment and Candidate Information

- 7.1 Candidate information is collected primarily to provide recruitment and employment services. Information may be stored in FrameWork's recruitment systems and used to consider an individual for current or future opportunities.
- 7.2 Where a candidate is being considered for a specific opportunity, FrameWork may discuss relevant experience, qualifications, availability and suitability with the client. Sensitive or unnecessary personal information should not be disclosed unless it is relevant, authorised and lawful to do so.

8. Employment and Temporary Worker Records

- 8.1 For employees and temporary workers, FrameWork will maintain records reasonably required to administer the employment relationship and meet its legal obligations. This may include employment agreements, assignment information, payroll records, leave information, health and safety records, training and induction records, performance or disciplinary records, and relevant communications.
- 8.2 Host clients may provide FrameWork with information about a worker's attendance, performance, conduct, safety or assignment. FrameWork will handle that information in accordance with this policy and applicable employment and privacy obligations.

9. Storage and Security

- 9.1 FrameWork will take reasonable safeguards to protect personal information against loss, unauthorised access, misuse, modification or disclosure. Information may be stored electronically in approved business systems, including FrameWork's recruitment CRM and other payroll, accounting, communication and document-management systems, and in physical records where required.
- 9.2 Access should be limited to people who require the information for legitimate business purposes. Employees must not access, copy, disclose or use personal information for an unauthorised purpose.

10. Retention and Disposal

- 10.1 FrameWork will retain personal information only for as long as it is reasonably required for the purposes for which it was collected, for legitimate business requirements, or to meet legal record-keeping obligations.
- 10.2 When information is no longer required, FrameWork will take reasonable steps to securely delete, destroy or anonymise it.

11. Access and Correction

- 11.1 Individuals may request access to personal information FrameWork holds about them and may ask for information to be corrected if they believe it is inaccurate. Requests should be made to FrameWork's Privacy Officer.
- 11.2 FrameWork will respond in accordance with the Privacy Act 2020. In some circumstances the law permits information to be withheld, and if this applies FrameWork will explain the basis for doing so where required.

12. Privacy Breaches

- 12.1 Any employee who becomes aware of lost information, information sent to the wrong person, unauthorised access, a cyber incident or any other actual or suspected privacy breach must report it to the Privacy Officer as soon as possible.

12.2 FrameWork will assess privacy breaches promptly and take reasonable steps to contain and address them. Where a breach is notifiable under the Privacy Act 2020, FrameWork will notify the Office of the Privacy Commissioner and affected individuals as required.

12.3 Mandatory Breach Notification

- (a) Privacy complaints will be considered promptly and fairly. Individuals also have the right to contact the Office of the Privacy Commissioner if they are dissatisfied with the handling of a privacy matter.
- (b) A serious breach notification to the Office of the Privacy Commissioner is mandatory.
- (c) If FrameWork breaches the Privacy Act 2020, and the breach has caused (or is likely to cause) serious harm, the Privacy Officer will notify the Office of the Privacy Commissioner and any affected individual as soon as practicable.
- (d) In considering whether a privacy breach is likely to cause serious harm, the Privacy Officer will take into account the following:
 - (i) any action taken by FrameWork to reduce the risk of harm following the breach;
 - (ii) whether the personal information is sensitive in nature;
 - (iii) the nature of the harm that may be caused to affected individuals;
 - (iv) the person or body that has obtained or may obtain personal information as a result of the breach (if known);
 - (v) whether the personal information is protected by a security measure; and
 - (vi) any other relevant matters.

13. Employee Responsibilities

13.1 Anyone handling personal information on behalf of FrameWork must treat it confidentially, use it only for legitimate work purposes, follow FrameWork's systems and security requirements, avoid unnecessary collection or disclosure, and immediately raise any privacy concern or suspected breach.

14. Privacy Officer and Enquiries

- 14.1 The Director of FrameWork Recruitment Limited will act as Privacy Officer unless another person is formally appointed. Questions, access or correction requests, and privacy complaints should be directed to the Privacy Officer through FrameWork's usual contact channels.
- 14.2 Privacy complaints will be considered promptly and fairly. Individuals also have the right to contact the Office of the Privacy Commissioner if they are dissatisfied with the handling of a privacy matter.

15. Secret Recordings

- 15.1 FrameWork encourages an open and transparent working environment. Secret audio or video recordings by any device (including smartphones, smart glasses and smart watches) of meetings, conversations, activities or otherwise at work undermines good faith as well as the Privacy Act principles, and as such is not allowed.
- 15.2 Where FrameWork intends to record conversations or meetings, it will advise the affected employee/s of this, and a copy of the recording will be available to them.

16. Policy Review

- 16.1 This policy will be reviewed periodically and may be amended to reflect changes to FrameWork's operations, systems, legal obligations or privacy practices. Material changes will be communicated where appropriate.