



Shilo Privacy Policy

This website, the products and services sold on, or via, this website (www.shilopeople.com) are created, operated and controlled by ShiloPeople Pty Ltd (ACN 637 194 882) (**shilo.**).

shilo. is strongly committed to protecting your privacy rights in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) (**Privacy Act**) and ensuring your privacy is respected and maintained at all times. Our Privacy Policy explains how we collect personal information and how we store, use and disclose that personal information.

By accessing and using and continuing to use our website, products or services you agree to this Privacy Policy.

Collection of your personal information | shilo. will only collect and hold personal information (as defined in the Privacy Act) about you that is reasonably necessary to undertake our business activities and functions, deliver our products and services to you, or as otherwise permitted by law.

shilo. will collect personal information about you in a number of different ways. **shilo.** may collect personal information directly from you or in the course of our dealings with you. For example, when you contact us online or via telephone with a query or request or make a comment on our social media sites, when you correspond with us via email, when you use or order our products or services, visit our website, subscribe to our publications, alerts and newsletters or when you apply for a position of employment with us.

When we collect personal information directly from you, **shilo.** will take reasonable steps to notify you (using a collection notice) at, before, or as soon as practicable after, the time of collection. As a collection notice is specific to a particular collection of personal information, it will provide more specific information about our information-handling practices than this Privacy Policy.

shilo. may also collect personal information about you from publicly available sources and third parties (including to our related bodies corporate, business partners and service providers, credit reporting bodies, credit providers, third party payment processors, government agencies, public registries, search agencies, regulatory and licensing bodies, employers, parties to whom you refer us (for example, previous employers and referees), recruitment agencies and from publicly available sources of information (for example, online databases and social media)). When **shilo.** collects your personal information from third parties, we will take reasonable steps to make sure you are aware of the collection.



If you provide us with personal information about another individual (as their authorised representative), **shilo.** relies on you to inform them that you are providing their personal information to us and advise them that they can contact us for further information.

You must take reasonable steps to ensure the individual is aware of, and consents to, the matters outlined in this policy, including that their personal information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to access that information, and who we are and how to contact us.

Type of personal information | The type of personal information that **shilo.** collect and use depends on the type of dealings that you have with us and includes:

- contact information that allows us to communicate with you (such as email, address and telephone number);
- identity information that allows us to identify you (such as full name, date of birth, gender, occupation, job title and government-issued identification);
- business information of customers (such as company name, address, email address ACN, ABN and ARBN);
- professional information that helps us to understand more about you including your employment history, qualifications, talents, skills and abilities (e.g. references, resumes, qualification documents and test results);
- financial information that allows **shilo.** to pay you should you be engaged as an employee or contractor (such as bank details and tax details);
- information about a third party collected from you during recruitment (such as previous employers and referees);
- immigration information that allows us to verify that you are legally permitted to work in Australia (such as evidence of citizenship, visa or work permit documents); and
- employment and HR information about you collected in the course of providing our products and services to your employer (including, but not limited to, probation, performance, conduct matters, claims, complaints, investigations, disciplinary action, fitness to perform work duties, reasonable adjustment requirements, workplace accommodations, training programs, and licence/permit or other such requirements).

In the course of providing our products and services **shilo.** may collect information about you which is sensitive information (as defined in the Privacy Act), such as information or opinions about your health, political affiliations, sexual preferences, religious beliefs, racial or ethnic origin or other such private information.



Use and disclosure of your personal information | shilo. only use, process and disclose your personal information for the purposes for which it is collected. In particular, **shilo.** use, process and disclose your personal information to:

- provide or deliver our website, product or services to you;
- to maintain contact with clients and customers;
- assist with, or respond to, your questions or queries;
- inform you about our website, products or services, offers, promotions, events, surveys, questionnaires, job opportunities, industry developments or other HR related matters which we believe are of interest to you;
- share with our Authorised Third Parties;
- administer, improve and manage our website, products, services and relationship with you;
- charge and bill you for the use of our products and services;
- verifying your identity;
- to conduct fraud, risk reduction and creditworthiness checks;
- for internal record keeping;
- for direct marketing purposes; and
- comply with our legal and regulatory obligations.

shilo. may provide your personal information to our employees, related entities, business partners, third party contractors, suppliers and agents from time to time for the purpose of delivering, providing and administering our products, services or website and third party service providers for the purpose of performing functions on our behalf, but may not process or use such information for any other purpose. Examples of these third-party service providers include, but are not limited to, such as marketing and analysis organisations, third party payments processors, hosting companies, web developers, internet service providers, customer service providers, customer support specialists, fulfilment companies, external business advisors (including auditors and lawyers), our insurer, and research and data analysis firms (collectively, **Authorised Third Parties**).

When **shilo.** discloses your personal information to any of our Authorised Third Parties **shilo.** will ensure that they undertake to protect your privacy. These Authorised Third Parties are not permitted to use the information for any purpose other than the purpose for which they have been given access. Our Authorised Third Parties may also provide us with personal information collected from you. If you disclose personal information to an Authorised Third Parties, we rely on you to provide the Authorised Third Parties with consent for us to collect, storage, use and disclose your personal information.



We may also disclose any personal information we consider necessary to comply with any applicable law, regulation, legal process, governmental request or industry code or standard.

Overseas disclosure | Authorised Third Parties may be located in or outside Australia. For example, for payment purposes we may disclose your personal information to our third party payment processors located overseas, including in the United States, Japan, European Union and other countries from time to time. Before **shilo.** discloses your personal information overseas, **shilo.** will take reasonable steps to ensure that overseas Authorised Third Parties treat your personal information securely; and comply with the Privacy Act.

By accessing or using our products, services or website or providing your personal information to us, you explicitly and freely consent to the transfer of your personal information to our overseas Authorised Third Parties. If you do not wish to receive information from any of our Authorised Third Parties, please let us know using the details below.

Directing marketing | **shilo.** may use your personal information to send you information, including about our product and service offerings, where you have provided your consent (expressly or impliedly) for us to do so, or we are permitted to do so by law. **shilo.** may send this information to you via the communication channels specified at the time you provide your consent. These communication channels may include mail, email, SMS telephone, social media or by customising online content and displaying advertising on our website. These communications may continue, even after you stop using our products or services. You can opt out of receiving these communications by contacting us by email at hello@shilpeople.com or using the unsubscribe function in the email or SMS.

Keeping your personal information up to date and correct | **shilo.** will use reasonable endeavours to keep your personal information accurate, up-to-date and complete. You may be able to gain access to personal information that we hold about you and update this information by emailing hello@shilpeople.com. If **shilo.** do not allow you to access any part of your personal information, we will tell you why in writing. **shilo.** will not charge you for requesting access to your personal information but may charge you for our reasonable costs in supplying you with access to this information.

Keeping your personal information secure | **shilo.** will take all reasonable steps to protect your personal information held by us from misuse, loss and from unauthorised access, modification or disclosure. Our security measures include: (1) physical security – restricted access to our premises and physical records, including the use of lockable filing cabinets; (2) computer and network security –



password protection, firewalls and virus checks to help prevent the access to electronic information by unauthorised persons; and (3) personnel security – clauses in employee agreements requiring confidentiality and employees are provided with training in security awareness, practices and procedures.

shilo. will take reasonable steps to destroy or permanently de-identify personal information if it is no longer required or if you ask us. We are however required by law to retain personal information in order to fulfil legal responsibilities or resolve disputes which may arise.

Disclaimer | The transmission of information via the internet is not completely secure. While we do our best to protect your personal information, **shilo.** cannot guarantee the security of any personal information transmitted through the website. You provide your personal information to us at your own risk and we are not responsible for any unauthorised access to, and disclosure of, your personal information.

Data breach notification | In the event of any loss or unauthorised access or disclosure of your personal information, **shilo.** will investigate, take steps quickly to mitigate any harm that may result and **shilo.** will notify you and the Australian Information Commissioner as soon as practicable in accordance with our obligations under the notifiable data breach scheme contained in the Privacy Act.

More information | If you would like more information about the way we manage personal information at **shilo.** please email hello@shilopeople.com.

Changes to this Privacy Policy | shilo. may make changes to this Privacy Policy from time to time. Any revised policy will be posted on our website and effective from the time of posting. Your continued use of our products, services or the website following the posting of any revised policy indicates your acceptance of the changes to the policy.

Cookie policy | shilo. may collect information when you access and use the website by utilising features and technologies of your internet browser, including cookies, embedded web links and similar technologies. A cookie is a piece of data that enables us to track and target your preferences.

The type of information **shilo.** collect may include location information, your computer's internet protocol (IP) address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on your website, dates and times of visits to our website and other usage statistics.



shilo. may use cookies and similar technologies to enable us to identify you as a return user and personalise and enhance your experience and use of the website and help us improve our service to you when you access the website and to ensure that the website remain easy to use and navigate.

Most browsers are initially set up to accept cookies. However, you can reset your browser to refuse all cookies or warn you before accepting cookies. If you reject our cookies or similar technologies, you may still use the website but may only have limited functionality of the website. **shilo.** may also use your IP address to analyse trends, administer the website and other websites we operate, track traffic patterns and gather demographic information. Your IP address and other personal information may be used for credit fraud protection and risk reduction.