

Recruitment Privacy Statement

Section 1 - Introduction

At LGT Crestone Wealth Management Limited (ABN 50 005 311 937) (*LGT Crestone Wealth Management*), we are committed to safeguarding the Personal Information that we collect and use in the course of our business operations.

This Privacy Statement (*Statement*) describes how we manage our obligations under the *Privacy Act 1988* (Cth) (*Privacy Act*) and the Australian Privacy Principles (*APPs*), which regulate the way which we manage your Personal Information for the purposes of employment, including recruitment.

Capitalised terms in this Statement are defined in section 4. References to **LGT Crestone**, **we**, **us** and **our** are to LGT Crestone Wealth Management and its affiliates. References to **you** and **your** are to you as an individual from whom we collect Personal Information.

This Statement should be read in conjunction with:

- our Privacy Statement that is available on our website at <https://www.lgtcrestone.com.au/privacy-statement>
- any other privacy or collection statement that we provide to you when we collect your Personal Information; and
- the privacy statement of the organisation that you may have used to apply for a position with us.

Section 2 - Personal Information

2.1 What Personal Information do we collect?

We collect Personal Information about you to evaluate your employment application and administration of employment with us.

The information we collect may be Personal Information and Sensitive Information, that may include:

- identification and emergency contact details;
- qualification, training, employment history;
- psychometric testing details;
- residency/visa status;
- taxation, banking and superannuation or retirement membership details; and
- union, professional or trade association membership details.

2.2 How do we collect Personal Information?

Directly from you

We will, in most cases, collect Personal Information from you directly, including Sensitive Information you choose to disclose. For example, if you provide us with health or membership information.

From third parties

In some circumstances, we may also collect Personal Information and Sensitive Information about you from other third parties. Third parties from whom we may acquire Personal Information include, but are not limited to, information service providers, your referees (or organisations that they represent), a recruitment provider, previous employers, other CV checking agencies, criminal records check supplier, our psychometric testing and training provider, and/or others who may be able to provide information to assist us with our recruitment decision or to process your employment.

Should a third party provide us with your Personal Information, we will assume that you have provided your consent for that third party to do so, unless you tell us otherwise. If you have any problems or queries with us obtaining Personal Information about you from a third party, or if you would like to correct the Personal Information we hold about you, you should contact us and the relevant third party to address your problems or queries – see more contact information in section 3.

Collection through other means

We may also collect Personal Information about you through other means, for example from publicly available information sources, third party search engines and from your representatives and associates.

2.3 Why do we collect your Personal Information and how will we use and disclose it?

We collect your Personal Information to evaluate your employment application and administer employment with us.

We may use the Personal Information we collect about you for the following purposes:

- to assess your skills, qualifications, and suitability for the position;
- to communicate with you about the recruitment process;
- to make informed decisions about the recruitment process;
- to keep records related to our hiring processes;
- to comply with legal or regulatory requirements and obligations; and
- to process your application to make an offer of employment, including processing your employment.

2.4 Who do we disclose your Personal Information to?

We may share your Personal Information, for the purposes described in this Statement, with:

- our employees and related bodies corporate, including to their officers, employees and professional advisers;
- other third-party service providers, including CV checking agencies, legal, business consulting, information service, training and checking providers, recruitment agencies, banking, data processing, data analysis, electronic signing/collation, information broking, mailing, marketing, research, investigation, insurance, and identity verification;
- state and federal government agencies, regulatory bodies and law enforcement agencies;
- referees and previous employers;
- any other person to whom you have authorised us or our related bodies corporate to release Personal Information;
- any other third party where we have obtained your written consent; and
- other persons as required or permitted by law.

We take reasonable steps and measures to ensure that the parties we share your Personal Information with are bound by equivalent privacy obligations as set out this Statement.

2.5 Disclosure of Personal Information overseas

We may disclose your Personal Information to our related bodies corporate and other third party service providers outside of Australia, who perform functions on our behalf or assist us to undertake our business operations and activities. These overseas entities may be located in, or have personnel that may access your information from, jurisdictions including: Austria, Belgium, Brazil, Canada, China, Denmark, Finland, France, Germany, Hong Kong, India, Indonesia, Ireland, Italy, Japan, Liechtenstein, Luxembourg, Malaysia, Mexico, Netherlands, New Zealand, Norway, Philippines, Portugal, Russia, Singapore, South Africa, South Korea, Spain, Switzerland, Taiwan, Thailand, United Arab Emirates, United Kingdom and United States of America.

2.6 Using our website and cookies

Please refer to our Privacy Statement that is available on our website <https://www.lgtcrestone.com.au/privacy-statement> for information about how our website use cookies and our responsibility regarding links on our website.

2.7 Storage and Security of Personal Information

We generally hold Personal Information in our electronic databases but also store Personal Information in hard copy form and in various third party databases. All Personal Information will be held in a secure environment—either in writing, electronically or both. We have security measures in place which are intended to protect Personal Information that we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Personal Information will only be available to our employees on a need-to-know basis in order to perform their duties.

The key methods of securing the Personal Information we hold will include but are not limited to:

- secure access to electronic and physical records containing Personal Information, via password protected access permissions to systems and security pass-protected access to filing cabinets and storage;
- access only to authorised LGT Crestone staff who need to access the Personal Information to perform their regular duties;
- varying access levels depending on the level of authority and the type of Personal Information required to be accessed; and
- controls relating to how Personal Information is extracted from the secure environment and how it is used and distributed.

We will retain recruitment data for no longer than is reasonable for the purpose that it was collected, after which your personal information will be destroyed.

2.8 Requests to access Personal Information

You can request to access the Personal Information we hold about you, at any time, by contacting the Human Resources team (hr@lgtcrestone.com.au) or our privacy officer. We have included the contact details for our privacy officer at section 3.

We will respond within a reasonable time period of receiving a request from you. Where possible we will provide you with a copy or details of your personal information in the manner you requested. We may charge a reasonable fee for access to your Personal Information.

Sometimes we may be unable to provide you with access to all of your personal information. Where this is the case, we will tell you why.

2.9 Requests to correct Personal Information

We take reasonable steps to ensure that the Personal Information we collect, use and disclose is accurate, complete, up to date and relevant. If you believe that your Personal Information is outdated, incorrect or incomplete, you may request to have the Personal Information corrected. We will respond within a reasonable period of receiving your request and we will promptly update our records accordingly.

If we refuse to comply with your correction request, we will tell you why.

2.10 Privacy Complaints

If you have any questions regarding our compliance with the Privacy Act or if you wish to make a complaint about our handling of your Personal Information, we encourage you to contact us. Relevant contact details can be found in section 3.

Complaints should first be made in writing to us, and should include your name, email address and/or telephone number and clearly describe your complaint. We will endeavour to respond to a complaint within a reasonable time period of receiving the complaint.

If you are not satisfied with our response to a complaint, you may lodge a complaint with the Office of the Australian Information Commissioner (**OAIC**). For further information regarding how to make a complaint to the OAIC, you can visit oaic.gov.au/privacy/making-a-privacy-complaint.

Section 3 - Other Information

3.1 Exemptions

This Statement does not apply in respect of any of our acts and practices that are directly related to an employee record of a current or former employee. These are captured in the LGT Crestone human resources policies and procedures. If you are successful in your application for employment with us, this Statement will cease to apply to you. Employees of LGT Crestone are covered by our internal policies and procedures relating to Privacy, including the way we handle their Personal Information.

This Statement does not apply in respect of any Voluntary Disclosure questions you may choose to respond to as part of your employment application and will not be subject to the collection purpose and use as outlined in section 2.3. Any information provided as a Voluntary Disclosure will be used solely for the purpose of improving our understanding of the profiles of candidates participating in our hiring process.

3.2 Changes to this Statement

We reserve the right at our discretion to modify or remove any part of this Statement at any time. You should review this Statement from time to time so that you are updated on any changes.

3.3 Contact details for privacy officer

You can contact our privacy officer by post or email, using the following contact details:

LGT Crestone Wealth Management Privacy Officer
Level 32, Chifley Tower 2 Chifley Square
Sydney NSW 2000

Email privacy@lgtcrestone.com.au

Definitions

Term	Definition
APPs	Australian Privacy Principles
LGT Crestone	LGT Crestone Wealth Management and its affiliates
LGT Crestone Wealth Management	LGT Crestone Wealth Management Limited
<p>GRI</p> <p>OAIC</p> <p>Personal Information</p>	<p>Government related identifier. Has the meaning given in the <i>Privacy Act</i> and includes an identifier of an individual that has been assigned by a government agency or authority, including their agents.</p> <p>Office of the Australian Information Commissioner</p> <p>Information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <ul style="list-style-type: none"> • whether the information or opinion is true or not; and • whether the information or opinion is recorded in a material form or not. <p>Common examples of Personal Information are an individual's name, signature, address, telephone number, date of birth, bank account details and commentary or opinion about a person.</p>
<p>Sensitive Information</p> <p>Voluntary Disclosure</p>	<p>Has the meaning given in the <i>Privacy Act</i> and includes information about an individual's racial or ethnic origin, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, criminal record, or health information.</p> <p>Is the provision of information provided by you in answer to questions in your employment application specifically identified as 'voluntary'</p>