

PRIVACY POLICY

Psychometric Solutions & Innovations Pty Ltd (PSI)

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1. POLICY PURPOSE

Psychometric Solutions & Innovations Pty Ltd (PSI) provides this Privacy Policy specifically to outline how we collect, use, disclose and store Personal Information gathered during psychological assessment and profiling. This document covers the use of psychological assessment and profiling for recruitment and development purposes.

We work diligently to protect the privacy, confidentiality and security of the Personal Information we receive and act in compliance with current data protection legislation as applicable to the services we provide, including the Privacy Act 1988 (Cth) ("**Australian Privacy Act**"). A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>. Due to the nature of the profiling reports, we draw on the Australian Psychological Society's Code of Ethics and the Australian Health Practitioners Regulation Agency (AHPRA) Psychology Board of Australia's Guidelines in addition to the Australian Privacy Act 1988 (Cth).

This Privacy Policy describes the principles and practices that apply to the Personal Information we collect from individuals – both online or offline – such as individuals who browse through, interact or register on our Sites; use the Products and/ or Services provided on our Sites; use our Assessments; provide services to us; communicate with us through telephone, email, text or other communication means; participate in our interviews or surveys; or apply for employment with us.

By using our services, you agree to the collection and use of information in accordance with this Privacy Policy.

2. PRIVACY PRINCIPLES

This Privacy Policy is based on the following privacy principles:

2.1 ACCESS, FEEDBACK & CORRECTION

Australian Privacy Principles 12 and 13 respectively, provide an individual with the right to access and correct their Personal Information held by an organisation. More detailed information is provided about access, feedback and correction in the dedicated section later in this policy document.

2.2 ACCURACY

We take reasonable steps to ensure the Personal Information we receive from our client about you, or from you, is accurate or corrected without delay if it is determined to be inaccurate. Our team are trained and highly experienced in the interpretation and application of the instruments used and we also conduct ongoing research to compare profiling and actual outcome measures. More detailed information relating to accuracy of collated data is provided in the dedicated section later in this policy document.

2.3 CHOICE

In those instances where we control your data, we will provide you with mechanisms to allow you to opt out of:

- (i) any of our direct marketing campaigns;
- (ii) any of our research or other surveys; and
- (iii) the use of your Personal Information for purposes that are materially different from the purpose for which we originally collected the Personal Information. For example, sometimes your employer may want to use your original recruitment results to look at informing development strategies.

2.4 DATA INTEGRITY

In those instances where we control your data, you will be able to:

- i. understand the Personal Information that we have about you;
- ii. correct or modify your Personal Information if it is inaccurate or incomplete; and
- iii. limit the collection of data to such data that is relevant to the Products and Services we provide to you or on your behalf.

2.5 DATA MINIMISATION

We process only that Personal Information which is adequate, relevant and necessary to achieve the purposes for which it is collected.

2.6 CONFIDENTIALITY, INTEGRITY AND ACCESSIBILITY

We take reasonable measures to protect the confidentiality, integrity, security and accessibility of your Personal Information, and our agreements with third parties with whom we share Personal Information require similar protections. In most circumstances, third party assessment distributors won't be able to identify you as we ask you to enter a job number rather than your personal details.

2.7 FAIRNESS AND TRANSPARENCY

We will process your Personal Information in a manner that is fair and transparent to you. We will not discriminate against you if you choose to exercise your privacy rights.

2.8 NOTICE

We will not collect or transfer your Personal Information without your knowledge. We inform you of such collection and transfer through this Privacy Policy.

2.9 PURPOSE LIMITATION

We collect Personal Information only for specific, explicit and legitimate purposes, and refrain from further processing that Personal Information in any manner that is incompatible with those purposes.

3. THE PERSONAL INFORMATION WE COLLECT AND HOW

We collect only such Personal Information as necessary to provide our Products and Services to you and/ or the client requesting the assessment and profiling services.

2.1 DATA COLLECTION FROM PARTICIPANTS/ CANDIDATES

The following information will be collected from participants in order to assist with selection or development purposes:

- **Identity Data:** including full name or similar identifier, title, gender.
- **Employment-related Data:** including Curriculum Vitae and Position Description.
- **Contact Data:** including email address, telephone number.
- **Proof of Identity Data:** for supervised testing sessions, sighting and recording of proof of identity documentation to confirm the identity of the sitter, if required by the requesting organisation.
- **Response Data:** responses to questionnaires relating to abilities and/ or personality preferences.
- **Confirmation Data:** other data relevant to recruitment or assessment purposes, which in some instances may include a confirmation discussion with you to confirm the profile.

2.2 DATA COLLECTION FROM CLIENTS/ CUSTOMERS

If you are a customer or other business contact, or if you are an employee or agent of a customer or business contact, we may collect your business contact data as follows in the regular course of our interaction with you:

- **Identity Data:** including full name, username or similar identifier, title, gender, job title, role.
- **Contact Data:** including billing address, delivery address, email address, telephone numbers.
- **Financial Data:** including bank account, payment card details, purchase order number.
- **Transaction Data:** including details about payments to and from you and/ or your organisation and other details of products and services you have purchased from us.
- **Context Data:** including information that will help us identify any potential risks associated with the context of a role, so we can provide recommendations and risk mitigation strategies for each candidate. This information may include factors such as hiring manager preferences and style, team or organisational climate or history specifically related to the role.

4. WHY WE COLLECT THIS INFORMATION

We collect this information for the following purposes:

- To administer and interpret psychometric assessments in a fair and objective way, where assessment results are treated as part of the whole decision-making process for recruitment or development decisions.
- To provide context-based, profile reports to authorised persons, for some or all of following:
 - Overall style and preferences.
 - Inherent strengths.
 - Potential developmental needs.
 - Potential risks and mitigation strategies in relation to context to explore further.
 - Practical development strategies to facilitate development/ fulfilment of potential.
 - Recommendations for on-boarding to set new hires up for success, based on context and personal preferences.

5. HOW WE COLLECT INFORMATION

Information is collected:

- Directly from you via online questionnaires through our own and third-party platforms.
- In a recruitment context, from third parties (e.g. clients, recruiters) who forward on contact information, career history and other relevant information, with your consent.
- In a development context, from clients who forward on contact information, context and other relevant information to help set up the process.
- In some cases, during confirmation discussions and interviews with us, or conveyed to us following client interviews.

6. HOW WE USE AND DISCLOSE INFORMATION

The information collated about you is for the specific purposes for which the assessment was requested (for recruitment or professional development testing). By undertaking the requested assessments, you are agreeing to the use of the data for the intended purposes, as would have been articulated to you by your recruiter/ potential employer (recruitment) or your employer or development program provider (development).

Assessment reports are managed as confidential documents and are only accessed by those officers within PSI and client organisations, who have a reasonable need to know, are provided the reports “in confidence” and understand how the reports should be used. The reports are used to add objective information to other information including current skill sets, experience and enthusiasm for a role/ development.

7. ACCESS & FEEDBACK

7.1 Access, Feedback & Correction Options

Australian Privacy Principles 12 and 13 respectively, provide an individual with the right to access and correct their Personal Information held by an organisation. Individuals have the right to access and correct their Personal Information held by an organisation. In instances where we control your data (personality profiling and abilities interpretation), we can provide you with the following:

- i. the opportunity to confirm whether we are processing your Personal Information;
- ii. a way to obtain feedback about Personal Information used in the profiling process;
- iii. the ability to restrict or object to processing of your Personal Information; and
- iv. the ability to correct, amend or delete Personal Information that is inaccurate.

7.2 Feedback

Candidates for recruitment cannot obtain a copy of the recruitment report, as the report is written for a particular purpose and quite often contains confidential contextual information, such as team culture or hiring manager style. To provide the report may have the potential to expose the Company or the Client's intellectual property and commercially sensitive information.

If you would like specific access to your assessment information, you should contact PSI to organise verbal feedback. Interpretation can only be provided by PSI personnel who are trained and qualified in the interpretation of the specific instruments you undertook. Feedback should not be delivered by the client organisation who requested the assessment, unless appropriately qualified personnel have been trained by PSI in how to deliver feedback, based on our specific reports.

7.3 Feedback Options & Access

Feedback is available in a number of formats:

- i. A short, 10-minute online or phone debrief of the overall results from abilities and personality profiling. This is a service we offer free of charge.
- ii. A candidate feedback report highlighting overall results from abilities and personality profiling. There is a small fee for this report and it is recommended to be done in conjunction with verbal feedback.
- iii. A 45-minute online debrief on overall results from abilities and personality profiling, including the opportunity to discuss specific queries and get practical work-around strategies to facilitate ongoing development. There is a fee associated with this formal debrief.
- iv. A full candidate feedback and leadership development report highlighting detailed results from abilities and personality profiling, as well as practical strategies for development. There is a fee for this report and it is recommended to be done in conjunction with the online debrief.

Please note, that whenever reports raise potential development needs or risks, client organisations/ requestors are provided with structures to guide follow-up through further interviews and with referees. This is because profiling provides part of the picture but not all of it.

All individuals have some potential development needs and the benefit of profiling; is we can make suggestions to work around or improve on these. If you disagree with a finding in your debrief, you should advise the psychologist in the first instance. If the amendments offered by you are material to the content or purpose of the assessment, then the means of resolving the difference between the assessor and you can be pursued, for example through reference checking or some other form of observed behaviour or performance.

At the time of access, you will have to establish your identity via a standard validation process such as by providing your date of birth or other identifying information. You may request access by contacting us at info@psychsolutions.com.au.

8. ACCURACY

8.1 Personal Information Input

You provide the personal information, usually via your employer or the hiring organisation, and are relied upon to disclose it accurately. It is our responsibility to administer and interpret the assessment tools accurately. We also take reasonable steps to ensure the Personal Information we receive from our client about you, or from you, is accurate or corrected without delay if it is determined to be inaccurate.

In addition to your curriculum vitae and contact details, client organisations may provide a position description, candidate specification, organisation chart or briefing on points of interest to them in relation to the assessment. They also provide context and sometimes information about stakeholders to the role, if there are potential risks which need to be evaluated. This is the client organisation's confidential information and intellectual property.

8.2 Interpretation

PSI personnel are trained and highly experienced in the interpretation and application of the instruments used. We ensure the tools used are psychometrically sound and form a strong base framework for the overall profiling process. We don't allow assessment to be purely based on a computer-generated report, instead looking at the profile in the light of other role and organisational context information, provided by the client. Profile confirmation interviews are also conducted by PSI or the client, depending on the level of profiling selected.

In order to ensure ongoing accuracy of interpretation and the success of practical on-boarding or development suggestions, PSI conducts ongoing research to compare profiling and performance measures. When such research is conducted, the information is de-identified and grouped together with other data so that an individual's information cannot be recognised or reconstructed.

9. STORAGE AND SECURITY

The PSI team are committed to ensuring security of information during processing, as well as maintaining the resilience of our systems and services, so we can ensure confidentiality and security of the Personal Information we hold. We follow accepted industry standards to protect Personal Information, including administrative, physical and technical controls.

9.1 Security & Storage Measures

Your Personal Information is stored in a manner that reasonably protects it from misuse, loss and from unauthorised access, modification or disclosure. Technical and organisational measures we take include:

- Digital data is encrypted and stored in secure cloud environments.
- Access is restricted to authorised personnel only.
- Information access controls via password and log-in management - access is restricted to authorised personnel via discrete logins and secured with multi-factor authentication.
- Your individual responses to the intellectual abilities and personality questionnaires are submitted by you, using a job number rather than your Personal Information – even if the test supplier systems were breached, there would be no way of identifying you.
- The only time your responses and your Personal Information come together is in the final report, which is password protected and stored securely, requiring multi-factor authentication to access.
- Clients receive password protected reports, with passwords generated by a separate system to where initial Personal Information is lodged. Access to passwords is provided separately to reports, from a different email address or via text to the requesting client.
- Regular, scheduled changes of password and system access.
- Monitoring for account compromise and suspicious activity.
- Security and privacy technologies including anti-virus scanning.
- Awareness training in relation to personnel at induction, on an ongoing basis and in the event of any specific data management change or need.

9.2 Your Obligations

PSI provided you with a job number and/ or password which enabled you to access certain parts of our Sites or use our Products and/ or Services. You are responsible for keeping the job number and password confidential. You should not share these details with anyone, and you should immediately inform us if you discover your credentials have been made known to a third party so we can make changes to your information in our system. We request that you completely delete any information sent to you containing your job number and/ or password once you have completed the assessment.

9.3 Data Removal/ Deletion

We retain data unless there is a specific request to delete it by either the requesting organisation or the participant. We take reasonable measures to protect your personal information, but no method of transmission or storage is 100% secure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. Information pertaining to assessment and profiling will be stored securely in job files, which will be kept by us for 7 years, unless otherwise instructed by you. Any destruction of assessment information follows the practices for destroying confidential information.

10. COMPLAINTS

If you have any queries or complaints regarding the handling of your data, please contact us immediately at info@psychsolutions.com.au and we will respond to your complaint within two working days to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint. If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (**OAIC**) via their website, www.oaic.gov.au.

11. YOUR AGREEMENT TO THIS PRIVACY POLICY

By undertaking our assessments, using our Site(s) or our Products or Services, or submitting Personal Information to us, you agree to the practices described in this Privacy Policy.

If you reside in a country or territory that restricts the transfer of Personal Information out of that country or territory, please do not submit Personal Information to us. If you nevertheless choose to, you agree to the transfer, storage and processing of your Personal Information to an organisation in a country that may not have data protection laws that provide the same level of protection as those that exist in your country of residence. A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

12. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. The latest version will be available on request and is available to all assessment participants via a link included on initial briefing email.