

# Recruitment and Privacy Policy

PEOPLE AND CULTURE | 23/11/23





## Disclaimer

Clarus is the umbrella term used for the separate legal entities of First Gas Limited, Gas Services NZ Limited, Rockgas Limited, Firstlight Network Limited, Flexgas Limited, First Renewables Limited and any and all of their related companies. All references to Clarus contained in this policy are to be treated as a reference to those entities. All permanent, fixed term and casual employees employed by any of these legal entities and all contractors and consultants undertaking work on behalf of those entities in the Clarus are expected to adhere to this Policy.

## Revision Table

Rev	Publish date	Section	Revision details	SME	Approver
0	03/09/2020		New document	J Cummack	K O'Sullivan
1	14/08/2023		Update to reference Privacy Act 2020	J Cummack	K O'Sullivan
2	23/11/2023		Updated to Clarus	J Cummack	K O'Sullivan

## Confidentiality

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## 1. Scope

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This policy applies to all external and internal applicants who apply for a position at Clarus.

## 2. Purpose

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We will ensure that personal information collected in the course of recruitment activity is kept safe and held in accordance with the principles of the New Zealand Privacy Act 2020. Personal information is information about an identifiable individual (a natural person).

## 3. Policy

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This policy relates to the potential collection, use, disclosure, disposal and protection of personal information of individuals (external and internal applicants) who apply to Firstgas Group for job vacancies.

This policy does not limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, see [www.privacy.org.nz](http://www.privacy.org.nz).

## 4. Who do we collect your personal information from?

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We collect personal information about you from:

- You, when you provide that personal information to us, including via the website and any platform or service, through any application process OR through any contact with us (e.g. telephone call or email).
- Third parties, including recruitment agencies and pre-employment check providers, where you have authorised this or the information is publicly available.

If possible, we will collect personal information from you directly.

## 5. What personal information will we collect from you?

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We will only ask for and collect information that is relevant to your suitability for the particular role that you apply for. This information may include but, depending on the requirements of the job, won't be limited to:

- Your contact details
- An application form
- A copy of your CV
- A current drivers licence
- Referee contact details
- Information required for pre-employment checks which may include, but are not limited to, checks on your eligibility to work in NZ; medical checks, Ministry of Justice/police checks, ACC history checks, credit checks and qualification checks.



## 6. How we use your personal information

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We will use your personal information in a recruitment process:

- To verify your identity
- To provide information to you
- To profile our organisation and the job vacancies to you, including contacting you electronically (e.g. by text or email for this purpose)
- To undertake pre-employment checks of you
- To respond to communications from you
- For any other purpose authorised by you or the Act.

## 7. Disclosing your personal information

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We may disclose your personal information to:

- Those people directly involved in the recruitment process for the role and the approval of the appointment
- Police, NZTA, MoJ, ACC, a medical professional, a credit reference agency and/or other parties in the nature of pre-employment checks
- Recruitment agencies if they are managing the recruitment on our behalf
- Other third parties (for anonymised statistical information)
- A person who can require us to supply your personal information (e.g. a Regulatory Authority)
- Any other person authorised by the Act or another law (e.g. a Law Enforcement Agency)
- Any other person authorised by you.

## 8. Protecting your personal information

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We will take reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse.

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.

- If you post your personal information on our website's message board/ chat room, you acknowledge and agree that the information you post is publicly available.
- If you follow a link on our website to another site (e.g. our Career Page links to the SmartRecruiter site), the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information.

## 9. Accessing and correcting your personal information

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Subject to certain grounds for refusal set out in the Act, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.



In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

If you want to exercise either of the above rights, email us via your candidate account on our SmartRecruiters portal. Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).

## 10. Contacting your referees

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We will not conduct reference checks on you (formal or informal; written or verbal) without your permission to do so. Prior to contacting your referees, we will ask you to provide us with their details and your permission (by email for us to contact them. If you have already provided thei

## 11. Release of information about you if you are the successful applicant

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If you are the successful applicant for a position, we will check with you when you are happy for us to announce your appointment and what personal information we can disclose about you as part of announcing you are joining us.

The information that we have gathered about you during the recruitment process will be treated in accordance with our Privacy Policy as part of the information that is collected on employees during the course of the employment relationship.

## 12. Storage and/or disposal of your information

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We take great care with the way that the information gathered about you is handled, stored and/or disposed of.

The business that supports our recruitment process is located outside New Zealand. This may mean your personal information is held and processed outside New Zealand, for example, in cloud storage.

We will securely destroy the applications of unsuccessful candidates and successful candidates who decline offers after three months, unless we have received your prior consent to keep your personal information on file in case another suitable opportunity should arise.

If we are using a recruitment agency to manage the recruitment, we will ensure that they meet our privacy obligations to applicants.

## 13. Changes to the Recruitment and Privacy Policy

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We may change this policy from time to time and we will tell you about a change in the policy by posting an updated policy on our recruitment website. Any change we make applies from the date we post it on the website.



## 14. Privacy complaints

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Applicants who wish to lodge a privacy complaint should raise it with the Office of the Privacy Commissioner. See [www.privacy.org.nz](http://www.privacy.org.nz) for more information.

## 15. Legislation

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The Privacy Act 2020