Privacy Policy

This Policy applies to Talentia and all subsidiaries			
Effective date	01.09.2026	**Next review date**	01.09.2027

1. Purpose

Talentia respects the privacy of the people we work with. We handle personal information carefully, lawfully and only where there is a legitimate business or legal reason to do so. This Policy explains how Talentia collects, uses, stores, protects and shares personal information, and how people can access or ask us to correct their information. This Policy supports Talentia's obligations under the Privacy Act 2020, the Health Information Privacy Code 2020 where it applies, and our privacy responsibilities under the ACC Accredited Employer Programme (AEP).

2. Who and what this Policy covers

This Policy applies to personal information handled by Talentia and its subsidiaries in connection with our business. It covers information about candidates, temporary workers, employees, clients, referees, contractors, suppliers and other people we deal with.

It applies to information held in any form, including electronic records, paper files, emails, messages, photographs, recordings and information held in business systems or by service providers on Talentia's behalf.

3. Our approach

Talentia will:

- collect only information we need for a clear and lawful purpose;
- explain why information is being collected, how it may be used and who it may be shared with;
- take reasonable steps to ensure information is accurate, complete and up to date before using it;
- keep information secure and limit access to people who need it for their work;
- use and disclose information only for the purpose it was collected for, or another purpose permitted by law;
- keep information only for as long as it is needed for a lawful purpose or required by applicable recordkeeping obligations; and
- respect each person's right to request access to, or correction of, their personal information.

4. What information we collect

Depending on a person's relationship with Talentia, we may collect:

- contact details, date of birth and identity or work-rights information;
- CVs, work history, qualifications, references, skills and suitability information;
- employment, assignment, attendance, timesheet, payroll, tax and bank details;
- training, induction, performance, conduct, complaint and workplace health and safety information;
- incident, injury, rehabilitation, medical and fitness-for-work information where relevant; and
- information provided by clients, referees, service providers, government agencies or other people where relevant to our work.

We do not seek health or other sensitive information unless it is relevant to a legitimate purpose, such as managing a workplace injury, supporting a safe return to work, meeting a legal obligation or responding to a workplace safety concern.

5. How we collect information

We usually collect information directly from the person concerned, for example through recruitment, onboarding, employment, assignment, payroll, training, incident or injury management processes.

We may also receive information from clients, referees, previous employers, medical or rehabilitation providers, WorkAon, ACC, government agencies and other third parties where this is relevant and lawful. When we collect personal information indirectly, we will take reasonable steps to make sure the person is aware of the collection, its purpose, intended recipients, who is collecting and holding it, and their access and correction rights, unless an exception under the Privacy Act applies.
We will provide privacy information at the point of collection or through relevant forms, notices, agreements or processes. Where consent is required, we will explain what is being requested and obtain it before proceeding.

6. How we use and share information

We use personal information for purposes connected with recruitment, employment, placement and assignment management, payroll, client service, workplace health and safety, training, complaints, injury management, rehabilitation, legal compliance and the protection of people and property.
We may share information with a client where reasonably necessary for recruitment, placement, assignment management, workplace safety, performance or another stated purpose. We may also share relevant information with payroll and technology providers, professional advisers, insurers, medical and rehabilitation providers, WorkAon, ACC, government agencies, regulators or other parties where authorised or required by law.
We do not sell personal information. We take care to share only the information reasonably needed for the purpose and to check that the recipient is entitled to receive it. Information may be disclosed outside New Zealand only where the requirements of the Privacy Act are met.

7. Health and injury information – AEP

Health and injury information is particularly sensitive. Talentia will handle it with additional care and in accordance with the Privacy Act 2020, the Health Information Privacy Code 2020 where applicable, ACC requirements and our obligations under the Accredited Employer Programme (AEP).
Where a work injury claim is managed under the AEP:

- WorkAon acts as Talentia's third-party administrator and manages the official work injury claim file on Talentia's behalf.
- Relevant injury and rehabilitation information is shared with WorkAon and ACC where required for the management of the claim and in accordance with applicable privacy requirements.
- Appropriate consent and authority processes are followed when collecting or releasing claim information.
- Injury claim information is kept separate from ordinary personnel and employment records, with access restricted to authorised personnel who need it for claims and injury management.
- Information is stored securely, kept accurate and made available to ACC in accordance with AEP requirements.
- Any suspected privacy breach involving AEP claim information is escalated and reported in accordance with Talentia's Injury Management Manual, WorkAon arrangements and ACC requirements.

The detailed processes for managing injury claim information, consent, access, storage and privacy breaches are set out in Talentia's Injury Management Manual and related procedures.

8. Keeping information safe

Talentia uses reasonable and appropriate safeguards to protect personal information against loss, misuse, unauthorised access, modification or disclosure. The safeguards used will reflect the nature and sensitivity of the information and the risks involved.
These safeguards may include secure business systems, access controls, passwords and other security measures, secure storage of paper records, appropriate handling and disposal of documents, and arrangements with service providers who hold information on Talentia's behalf.
Access to personal information is limited to authorised people who need it for their role. Everyone handling information for Talentia must take care when viewing, using, storing, sending, discussing or disposing of it, whether it is held electronically or on paper.

9. Access, correction and retention

People may ask Talentia for access to personal information we hold about them or ask us to correct information they believe is wrong, incomplete or misleading. Requests should be made to Talentia, asking for the Privacy Officer. We may need to verify a person's identity before responding.
If we agree that information needs correcting, we will take reasonable steps to correct it. If we do not make a requested correction, the person may ask us to attach a statement of the correction they sought to the information, where appropriate.

Talentia keeps personal information only for as long as it is needed for the lawful purpose for which it was collected, or for as long as required by applicable legal, employment, tax, health and safety, insurance, ACC or other recordkeeping obligations. When information is no longer required, it will be securely destroyed or de-identified where appropriate.

Some records, including work injury claim records, may be subject to specific retention and access requirements. Those records are managed in accordance with the Injury Management Manual and applicable AEP requirements.

10. Privacy incidents and breaches

Anyone who becomes aware of a suspected privacy breach, loss of information, unauthorised access or accidental disclosure must report it to their manager or Talentia's Privacy Officer immediately. Do not try to investigate or conceal the incident yourself.

Talentia will act promptly to contain the incident, recover or protect information where possible, assess the risk of harm, keep a record of what happened and take steps to prevent it happening again. We will notify affected people and the Office of the Privacy Commissioner where required by the Privacy Act, and report AEP-related privacy breaches to ACC in accordance with ACC's Operational Directives.

For AEP claims, WorkAon must notify Talentia's designated Complaints Manager of a confirmed privacy breach within the timeframe set out in the Injury Management Manual and applicable TPA arrangements. The Complaints Manager coordinates required ACC reporting. The manual's 72-hour WorkAon escalation requirement is an operational reporting timeframe; it does not replace or change any legal notification requirement.

11. What we expect from our people

Everyone who handles personal information for Talentia must:

- use information only for authorised work purposes;
- keep personal information confidential and secure;
- check recipients and attachments carefully before sending information;
- avoid discussing personal information where others may overhear;
- access only the records needed for their role;
- follow consent, claim-file and client privacy processes; and
- report privacy concerns, errors or suspected breaches immediately.

Workers should take care when providing personal information to Talentia and tell us if their contact details or other important information changes. They may raise a privacy question or concern without fear of retaliation.

12. Privacy questions, requests and concerns

For a privacy question, access or correction request, or concern about how information has been handled, contact Talentia and ask for the Privacy Officer. If the concern relates to an AEP injury claim, the person may also raise it with the WorkAon case manager or Talentia's designated Complaints Manager. People may also contact the Office of the Privacy Commissioner.

Talentia will consider and respond to privacy concerns fairly and promptly. Raising a concern will not result in retaliation or disadvantage.

13. Related documents and review

This Policy should be read alongside Talentia's Privacy Statement, AI Policy, Injury Management Manual, Complaints Procedure, Information Security requirements and any relevant consent forms or privacy notices.

Talentia will review this Policy at least annually, and sooner if there are changes to privacy law, ACC or AEP requirements, our systems, or the way we collect or use personal information.