

# Privacy Policy

We take protecting your  
personal data very seriously

## Who we are

### Four Pillars Group PTY Limited.

Four Pillars Group PTY Limited (hereafter known as four Pillars Group) is dedicated to enabling talented and entrepreneurial recruitment professionals to achieve the ultimate goal of building their own successful recruitment business.

We have a robust, finely-tuned investment strategy comprised of the four pillars that we know, from our own extensive experience and success in the recruitment industry, make the difference between the 20% that succeed and the 80% that don't.

Our portfolio strategy combines all of the portfolio businesses into a unified growth incubator, which substantially enhances capital returns for the business owners at the point of sale.

## What does this policy cover?

This policy sets out the types of personal data that we collect and explains:

- How and why we collect, store, process and use your personal data
- How long we keep your personal data for
- When, why and with whom we may share your personal data
- The legal basis on which we may collect, store and process your personal data
- The implications associated with refusing to provide us with your personal data
- The different rights and choices you have when it comes to your personal data
- How we may contact you and how you can contact us.

## What personal data do we collect about you?

We collect the information we need to identify whether an investment by Four Pillars Group is a viable option for your business or business opportunity.

This information includes CVs, identification documents, educational records, work history, budgets, business plans and references.

We only collect sensitive personal data where absolutely necessary. We only collect sensitive personal data from you, and further process this data, where you have given your explicit consent.

## Where do we collect personal data about you from?

The following are the different sources we may collect personal data about you from:

- Directly from you. This is information you provide while discussing whether an investment by the Four Pillars Group is right for you
- From an agent/third party acting on your behalf, e.g. a Recruitment to recruitment business.
- Through publicly available sources, such as:
  - Social media, including LinkedIn
  - Company websites
  - Articles and marketing literature
  - By reference or word of mouth. For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer.

## How and why we use your personal data?

We use your personal data in our discussions internally as to whether an investment by the Four Pillars Group is something we could offer to your business or business opportunity.

We will initially collect basic information on you such as contact details, job experience, business plans etc. and then will pass this on to the relevant people in our business .

If we feel that there is a possibility that an investment would be a visible option, we will then ask you to sign a Non-Disclosure Agreement before any more information is exchanged.

If you are receiving coaching from us, we may use your personal data in order to understand more about you and to assist you with understanding your skills and areas for improvement for future opportunities and options.

## How long do we keep your personal data for?

### We retain your information as follows:

- individual data: Two years from the last point of contact unless the individual says that they do not want to be contacted, in which case this information is deleted (unnecessary and outdated data will be deleted before this)
- Business relevant data: Two years from the last point of contact unless the individual says that they do not want to be contacted, in which case this information is deleted (unnecessary and outdated data will be deleted before this)
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- Coached candidate data: Two years after the coaching has finished (unnecessary and outdated data will be deleted before this).

## What legal basis do we have for using your information?

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For prospective investments, our processing is necessary for our legitimate business interests

That is, we need the information in order to assess suitability for investment by the Four Pillars Group.

We carry out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests before we go ahead with such processing.

We keep a record of these balancing tests. You have a right to and can find out more about the information in these balancing tests by contacting us using the details below.

If you are shortlisted as an investment opportunity or if you are coached by us, then this may involve processing more detailed personal data including sensitive data such as health information that you or others provide about you. In those cases we always ask for consent before undertaking such processing.

Do we use cookies to collect personal data on you?

Our website does not use cookies to collect or store information about you or your web browsing.

Do we use Google Analytics?

We use Google Analytics, which collects anonymous data about our website visitors, including:

- What website they arrived from
- How long they stay on our site for
- Which pages of our site they visit and for how long
- What kind of computer they are using.

No personal identifiable data is collected and no data is directly stored by us. All of this falls within the bounds of the Google Analytics Terms of Service.

## The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights.

We're providing this information in this policy.

## Your rights in relation to personal data we store

By law, you have a number of rights when it comes to your personal data.

Further information and advice about your rights can be obtained from the data protection regulator in your country.

## The right of access

You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy).

This is so you're aware and can check that we're using your information in accordance with data protection law.



## The right to rectification

You are entitled to have your information corrected if it's inaccurate or incomplete.

## The right to restrict processing

You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information collected via our contact us form and email communications but may not use it further.

We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

## How we will contact you

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We may contact you by phone, email or via social media.

If you prefer a particular contact method please let us know.

## How you can contact us

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If you are unhappy with how we've handled your information, or have further questions on the processing of your personal data, please get in touch.

You can write to us:

Four Pillars Group  
Level 9,  
70 Phillip  
Street  
Sydney  
NSW  
2000

