

PRIVACY

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1 INTRODUCTION

1.1 Scope

The management and handling practices of Personal Information of:

- employees;
- prospective employees;
- clients;
- suppliers; and
- Personal Information of third parties that may be held by Contract Resources.

1.2 Purpose

To safeguard Personal Information provided or disclosed to, Contract Resources.

1.3 References

- References**
- Privacy Act 1998 (Cth) ("**Privacy Act**")

1.4 Definitions and Acronyms

Australian Privacy Principles

The Australian Privacy Principles which govern standards, rights and obligations around:

- the collection, use and disclosure of Personal Information;
- an organisation or agency's governance and accountability;
- integrity and correction of Personal Information; and
- the rights of individuals to access their Personal Information.

Personal Information

Information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion including but not limited to names, addresses, email addresses, phone and facsimile numbers.

Company and/or Contract Resources

Contract Resources Group Pty Ltd (ACN 637 730 511) and its subsidiaries.

2 COLLECTING PERSONAL INFORMATION

The Company is committed to providing quality services to you and this procedure outlines our ongoing obligations to you in respect of how we manage your Personal Information.

This privacy procedure explains the types of Personal Information the Company collects and stores, why and how it is collected, used and disclosed. Our HR Manager is responsible for the application of the APPs.

The Company will only ask for Personal Information it reasonably requires in order to conduct business and/or comply with legal requirements. It will not collect, buy, rent or otherwise acquire Personal Information from third parties, without the employee's consent.

The Company will notify individuals in relation to:

- the purpose for which the information is collected;
- to whom it might disclose the information;
- any requirement under any law or regulation that requires this information to be collected; and
- the consequences if all/part of the information is not provided.

If there is anything that is not clear from this privacy procedure, please feel free to email us at hadmin@contractresources.com.

2.1 Compliance

This privacy procedure sets out how we comply with our obligations under the Privacy Act. As an Australian based organisation, we are bound by the APPs which regulate how organisations may:

- collect;
- use and disclose;
- store and secure;
- give an individual access to, and seek correction of; and
- transfer internationally,

Personal Information. In this privacy procedure, Personal Information has the same meaning as defined by section 6 of the Privacy Act.

2.2 What Information is Collected?

The Company collects Personal Information so that we can provide services, or information that we supply to clients. The type of information collected depends on the Company's needs to conduct its business and may include:

- names, addresses and contact details;
- email addresses, usernames and passwords;
- information contained in identification documents such as drivers' licences, passports, tax file numbers;
- academic qualifications and employment history; and
- bank account details.

We may also collect information on how you use our website, your preferences, opinions, and other personal preferences. Other information that may be automatically collected when you visit our website include (without limitation) your Internet Service Provider (ISP), operating system, browser information, Internet Protocol (IP) address or other device identifiers, location, and time/date stamp.

At times, we may collect and process sensitive information (as defined in section 6 of the Privacy Act) ("**Sensitive Information**") which may include information about your racial or ethnic origin, political opinions, professional or political or religious affiliations or memberships, sexual orientation or practices, criminal record, health, genetics and/or biometrics and commercial trade/credit checks. We may only collect and process Sensitive Information with the consent of the individual. Any Personal Information or Sensitive Information we collect from a third party or from a publicly available source, will be from companies or sources that are allowed to disclose it to us.

2.3 Collection of Information

Generally, Personal Information is collected directly from the individual when they deal with the Company either in person, over the phone, via email, via website or when a questionnaire is completed.

By clicking or using any social network widgets on our website, you understand that you do so in accordance with the terms and privacy policy of those services. 'Liking' or 'Following', and content posted using these widgets, may become visible to your social network.

Embedded content such as Google Maps, videos etc. is embedded or placed on our website - it is not hosted on our servers and therefore any interaction with such services is done so in accordance with their privacy policy.

www.contractresources.com may use cookies and other digital identifiers that can include:

- performance indicators to provides us with information on how our website is used;
- cookies that gives us statistics to understand how many people are on our website, which areas are popular and which areas we need to work on.

You can always disable the use of cookies by changing the security settings of your browser. However, please bear in mind that this may affect how some items are displayed on our website.

2.4 Use and Disclosure

We only use Personal Information for the:

- the primary purpose it was collected for; and/or
- a related purpose that would be reasonably expected, without further consent.

We will not otherwise provide your Personal Information to other entities or bodies, or any other party unless one of the exceptions set out in the APPs apply. For example:

- you would reasonably expect, or have been informed, that information of such kind would be passed on to those individuals, entities, or bodies;
- it is otherwise required or authorised by law, or reasonably necessary for the enforcement of a criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue;
- it may prevent or lessen a serious and imminent threat to somebody's life or health.

We note that some of your Personal Information may be stored with or disclosed to other entities overseas (who are not in Australia or an external Territory) who are direct partners or related entities of the Contract Resources group that assist us in providing our services. This may include Papua New Guinea, Taiwan, the United Arab Emirates, Oman, Kuwait, Qatar, Saudi Arabia, Egypt, Bahrain and the United States of America. As per APP 8, we have taken steps to ensure that the overseas recipient does not breach the APPs. We also have procedures in place to safeguard the handling of your Personal Information by such entities.

2.5 Disclosure to a Third Party

The Company will only disclose Personal Information to third parties with the consent of the individual concerned, if that disclosure is necessary for the purposes the information was collected.

Instances where it would be necessary to disclose Personal Information to a third party include, but are not limited to:

- the external administration of an employee's superannuation plan;
- financial institutions, for payroll administration;
- disability and death insurers, to enable claims to be processed;
- clients where Personal Information is required to grant site access;
- a medical assessment provider;
- for processing Company insurance claims;
- external IT service providers, to ensure the security of computer networks; and
- credit checks on clients.

3 SECURITY MEASURES

The Company stores Personal Information in a range of hardcopy and electronic formats, in accordance with [PRO.Document Management](#).

Hardcopy information is protected by:

- locking it in cabinets;
- only allowing access to necessary employees;
- keyed access;
- security alarms; or
- surveillance cameras.

Electronic information is protected by:

- access controls, e.g. user passwords, multifactor authentication and limited access to shared network resources;
- virus checking and backing-up data; and
- specialised IT support to deal with security risks.

Transmission of Personal Information by electronic means may involve unsecured telecommunications lines. Security is enhanced by:

- checking facsimile numbers before sending Personal Information;
- confirming receipt;
- pin numbers and passwords for the use of some transmissions; and
- encryption of data for high-risk transmissions.

3.1 Access

Employees must not disclose Personal Information that comes to their attention during their job.

You may access your Personal Information by sending a request to hadmin@contractresources.com. Personal Information will not be released to another individual or organisation, unless written approval is provided. The request must specify the type of information required and the reason. The HR Manager may reject the request if they believe it breaches the Privacy Act.

For any Personal Information that is collected by third parties, even when you are visiting our website, we refer you to the third party's privacy policy and seek assistance from those parties directly.

3.2 Altering Records

We do our best to ensure your Personal Information is up to date and accurate at all times, as this allows us to deliver a better service. If any information we have on you needs to be corrected, the Company will take reasonable steps to correct Personal Information that is inaccurate, by undertaking discussions to satisfy both parties, keeping in mind that it is inappropriate to delete or alter original information.

If you would like to update the information we have, please email hradmin@contractresources.com. We will endeavour to assist you with your questions. Please bear in mind that under Australian privacy laws, there may be situations where we cannot provide access to such Personal Information. For instance, if it would reasonably affect someone else's privacy or may pose a threat to someone's life, health, or safety.

When no longer required or requested by you, all Personal Information is destroyed in a secure manner, unless retention is required by law.

3.3 Complaints

Complaints or concerns about a possible breach of the APPs must be in writing, addressed to the HR Manager at hradmin@contractresources.com and clearly set out the nature of the complaint. Following receipt of your complaint, we will:

- acknowledge the complaint as soon as possible;
- investigate the matter and keep a record of all recommendations (if any);
- implement recommendations (where appropriate); and
- respond to your complaint in a reasonable time following conclusion of the investigation.

Individuals inquiring about their rights and remedies, can access detailed information at the Australian Privacy Commissioner's website: <https://www.oaic.gov.au>.

If you are not satisfied with the process of making a complaint to our team or the findings of our investigations, you may make a complaint to the Information Commissioner on the details below:

Office of the Australian Information Commissioner

GPO Box 5288 Sydney NSW 2001

<https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us>

Telephone: 1300 363 992

Fax: +61 2 6123 5145

3.4 Breaches

Management is committed to notifying individuals whose Personal Information is involved in a data breach that is likely to result in serious harm.

This notification shall include recommendations about the steps individuals should take in response to the breach. Any actual or suspected breach will be reported to General Counsel for assessment and development of the step-by-step response.

3.5 Contact Details

If you have any questions in relation this procedure or the management of your Personal Information you can contact our HR Manager by email at hradmin@contractresources.com.