

Privacy Policy

Purpose

This Privacy Policy ("this Policy") governs the procedures adopted by Primequip Group Pty Ltd (Primequip Group) in order to maintain the privacy of external persons to us when interacting with our company. This Policy has been created in accordance with The Privacy Act 1988 (Cth) ("the Privacy Act") and the Office of the Australian Information Commissioner's (OAIC) APP Guidelines.

Background

The Australian Privacy Principles ("APPs") are set out in the Privacy Act and require Primequip Group to follow a set of standards when we collect, use or disclose personal information given to us. It may be necessary for Primequip Group to obtain an individual's information that is personal, sensitive, or confidential ("personal information").

This Policy is designed to ensure any personal information we obtain is appropriately stored and disclosed. It applies to any person for whom we currently hold personal information and from whom we may collect personal information in future ("you"). This Policy does not apply to the records of current or past employees. We may amend or remove this Policy at any time and any revisions will appear on our website, at www.primequip.com.au

Collecting & Storing Your Personal Information

Primequip Group may collect and store your personal information electronically or in hard copy ("your personal information"). We will only release your personal information to others:

- where necessary and appropriate;
- where it is in your legal interests;
- if required by law; or
- to the extent necessary for our agents/contractors to carry out work on our or your behalf.

We will only disclose your personal information to recipients located overseas where it is necessary for us to provide you with our professional services.

We will request your consent to use or disclose your personal information for a purpose other than the purpose for which it was collected.

We will request your consent before collecting any sensitive information from you, such as is personal information that includes information or an opinion about your:

- racial or ethnic origin;
- religious or philosophical beliefs;
- trade union membership or associations;
- sexual orientation or practices;
- criminal record; and/or
- health or genetic information.



Please email our Privacy Officer at: admin@primequip.com.au for any further information regarding our use and management of your personal information. You may apply in writing to access your personal information.

If you consider your privacy has been breached by Primequip Group, you may lodge a complaint in writing by emailing our Privacy Officer, who will then contact you with a view to resolving the complaint.

Using & Managing Your Personal Information

We collect information from our clients, third parties, public records and other sources to enable us to provide professional commercial and legal services in the construction industry, and to provide our clients with information about those services.

We manage the personal information we collect by:

- providing our staff with training regarding privacy issues;
- maintaining procedures regarding the collection and handling of private information;
- reviewing our compliance with our legal obligations regarding privacy;
- implementing measures to keep the personal information we collect safe and secure, including using unique usernames and passwords and restricting staff access to systems on which personal information is stored electronically, and using key only access to our office at which personal information is stored in hardcopy; and
- appointing a Privacy Officer to administer and monitor our obligations and any complaints or applications regarding privacy matters.

Our professional obligations will mostly require us to deal with you using your real name. At all times, we will comply with our professional and legal obligations (including as to confidentiality) when dealing with your personal information.

Recruitment & Employment

If you apply for employment with Primequip Group, you may need to provide us with personal information, including information regarding your:

- education,
- current and former employment,
- working status, and
- state of health.

In submitting the application, you consent to Primequip Group using the information to assess your application and to allow us to carry out any monitoring activities which may be required under applicable law as an employer. We may also carry out screening checks (including verification of identity, reference, background, directorship, financial probity, eligibility to work, vocational suitability and criminal record checks) and consider you for other positions. We may provide your personal information to academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers.

admin@primequip.com.au

www.primquip.com.au

1 Oliver Street, Bellevue WA 6056

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Without your personal information, we will not be able to progress your application. Please advise us in writing if you do not wish us to retain your personal information for future reference once the application process has been completed.

Objections to Providing Personal Information

In providing our professional services to you, we may require your personal information. Depending on the circumstances, if you object to and choose not to provide us with that information, we may be unable to deliver our services to you.

Data Not Collected

Unless required by law, we do not collect data relating to:

- race or ethnic origin;
- political opinion;
- religious or philosophical beliefs;
- trade union membership;
- genetic or biometric data;
- mortality; or
- sexual orientation.

Your Rights

Under the Privacy Act you have the right to access your personal information. If the information is incorrect (or requires updating), you have the right to require us to amend (or update) the information.

Disclosing Your Personal Information

To deliver our professional services to you, Primequip Group may need to release your personal information to organisations or individuals with whom we conduct business and, where necessary, overseas recipients. Such organisations and individuals include related entities, accountants, auditors, printers, insurers, Law Mutual, the Legal Practice Board and agencies which regulate the provision of legal services.

The personal information we collect may be subject to review by a director supervising professional personnel.

Your personal information is only provided to others to the degree necessary to enable us to provide services to you and to the extent required by our professional obligations or by law.

Before providing your personal information to an overseas recipient we will endeavour to take reasonable steps to ensure that the overseas recipient does not breach relevant Australian Privacy Principles or the Privacy Act in relation to the information, or otherwise:

- be reasonably satisfied that they are subject to a law or binding scheme that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the APPs protect the information and there are mechanisms you can access to take action to enforce that protection of the law or binding scheme,
- obtain your consent to the disclosure (after informing you that the overseas recipient will or may not be required to comply with the APPs); or
- be satisfied that the disclosure would not otherwise breach the APPs.

Marketing Information

Unless you advise us in writing that you do not wish for us to do so, we may provide you with information from time to time about new services available from Primequip Group and we may also send you commercial and legal information which we consider may be of interest to you.

General Data Protection Regulation 216/679 (GDPR)

If you are a resident of the European Union for the purposes of the GDPR, then the following also applies to you.

If you so request, we will provide you the following information free of charge (and within 30 days of the request):

- what personal information pertaining to you is being processed;
- why the personal information is being processed;
- who has access to your personal information;
- how the personal information is being used in automated decisions (if relevant); and
- what processes are using the personal information.

You may request that we update, correct, delete or remove any obsolete data that we hold. If you make such a request we will, to the extent required by law, comply with your request within 30 days of the request being made.

You may also withdraw your consent to our using your personal information.

Require Further Information?

If you require further information about this Policy, access to your personal information, or wish to correct or update your personal information, please contact our Privacy Officer:

- by telephone on (08) 6186 7948;
- by email at admin@primequip.com.au;
- by post addressed to 'The Privacy Officer', Primequip Group Pty Ltd, 1 Oliver Street, Bellevue WA 6056.

We will give you access to your personal information as soon as is reasonably practicable, subject to the circumstances of your request. We require your proof of identity to discuss your personal information with you.

We may deny access to your personal information if:

- the request is impractical or unreasonable;
- providing access would have an unreasonable impact on the privacy of another person;
- providing access would pose a serious and imminent threat to the life or health of any person;
- providing access would contravene our professional obligations; or
- there are other legal grounds to deny the request.



We may charge a fee for the reasonable costs we incur in responding to a request for access to personal information. The fee (if applicable) will be disclosed prior to it being claimed.

Complaints Process

If you consider there has been a breach of your privacy and you wish to make a complaint:

- any complaint must first be made in writing (by email) to our Privacy Officer. We will acknowledge receipt of your complaint within 7 days and will then respond to you within a reasonable timeframe.
- if we fail to respond to your complaint within a reasonable timeframe, or the complaint cannot be resolved, you may refer your complaint to the Office of the Australian Information Commissioner.

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