

1. BACKGROUND

CPS Technology and Infrastructure Pty Ltd (“CPS”, “we”, “us” or “our”) consider that the responsible handling of personal information is a key aspect of good corporate governance and we are strongly committed to protecting an individual's right to privacy. CPS is subject to the *Privacy Act 1988 (Cth)* (“**Privacy Act**”) and the Australian Privacy Principles (“**APPs**”) (collectively “**Privacy Laws**”), which establish protective standards for the management of personal information.

This policy describes the way that CPS collects, holds and discloses personal information and the controls it has imposed to ensure compliance with the Privacy Laws.

In this policy the terms “**personal information**” and “**sensitive information**” bear their meanings defined in the Privacy Laws, but in substance, personal information refers to information about or related to an identifiable individual, while sensitive information is personal information about the relevant individual which is subject to additional controls. It includes details such as ethnic origin, health information, political and religious affiliations and criminal histories.

2. THE INFORMATION WE COLLECT

During the course of carrying on our business, we may collect personal information (including sensitive information) about individuals, including employees (part, full time, casual, temporary or contract), job applicants, independent contractors, landowners (including property interest holders) and representatives of the clients and suppliers we deal with. The kind of information we collect depends on the purpose for which it is collected.

1. Employees

In relation to our employees, we collect name and home contact details, including addresses, phone numbers and email addresses. We collect documentation to validate working rights such as copies of passports, birth certificates or visas. We may also collect details of their next of kin for emergency contact purposes, and taxation, banking and superannuation details. We collect Tax File Numbers of employees as an authorised recipient in accordance with *The Privacy (Tax File Number) Rule 2015*.

Where relevant to an employee's duties for us, we may also collect sensitive information such as:

- matters to do with health
- reports from medical practitioners
- police checks
- membership of a professional or trade association

2. Client and Supplier Representatives

For clients' and suppliers' representatives, we typically collect name, telephone and email contact details.

3. HOW WE COLLECT AND HOLD INFORMATION

1. How personal information is collected

Wherever reasonably possible, we collect personal information from the person to whom it relates. That is not always possible or appropriate and we do collect and use personal information from publicly available sources and from third parties.

Where we obtain personal information from a third party, including any of our clients, we are careful to seek confirmation from those providing us with the information that it was acquired in accordance with the requirements of the Privacy Laws, that they are entitled to provide it to us and that they are able to authorise us to use it for the purposes for which they are supplying it.

If the information is sensitive, such as a police check, we will take steps to confirm that the individual to whom it relates has provided consent to our collection and primary use of the information.

2. How personal information is held

Employee records and job applications are saved to a human capital management IT platform and a secure cloud storage which can only be accessed by authorised Human Resources representatives.

4. HOW WE USE THE INFORMATION WE COLLECT

CPS uses the personal information it collects:

- a) to communicate with its clients and provide its services to clients and potential clients;
- b) to enable CPS to provide services on behalf of its clients to the individuals to whom the information and
- c) to assess job applications, where the information relates to a job applicant.

Where CPS contacts you on behalf of a client and collects information relevant to the provision of services by CPS's client to you, the personal information collected will be used solely in relation to the provision of services to you by or on behalf of the relevant client. In such circumstances CPS collects the information as agent of the relevant CPS client and the use of that information may be subject to the client's privacy policy. In all such circumstances, CPS will clearly identify to you the client for whom it is collecting any personal information.

4.1. No direct marketing

We do not sell personal information to third parties or use personal information we have collected for direct marketing to you.

5. DISCLOSURE OF PERSONAL INFORMATION

CPS engages third parties to act on our behalf, both in the services we provide on behalf of our clients (for example, subcontractors who perform in-field works) and in our corporate support, warehouse and supply-chain functions (for example, information technology suppliers and professional advisors).

Where we collect personal information from you as agent on behalf of a third party, we will disclose that personal information to that third party.

In relation to CPS employees, we disclose taxation, banking and superannuation details to the ATO and your nominated superannuation provider. On occasion we may get confirmation of employment requests, which we will inform you before releasing your information to the requesting person.

If CPS intends to use or disclose any personal information it collects from you in any other manner than those contemplated in sections 4 or 5 of this policy, we will inform you unless the other use or disclosure is related to the original use or disclosure. Otherwise CPS will only disclose the personal information it collects where required or authorised to do so by Australian law.

6. OVERSEAS DISCLOSURES

CPS will not disclose any personal information it collects to any person located outside Australia unless:

1. we have obtained the consent of the individual to whom the information relates to that disclosure;
2. the recipient of the information is subject to a law or binding scheme, that provides at least a substantially similar level of protection in respect of the use of personal information to that available under Australian law and the person to whom the information relates is directly able to enforce their rights in respect of that protection; or
3. the disclosure is otherwise in compliance with our obligations and rights under the Privacy Act.

7. SECURITY AND ACCESS

We take reasonable steps to ensure all personal information we hold is kept secure from unauthorised access, modification or disclosure. CPS is required to notify the Australian Information Commissioner and all affected individuals if it experiences an eligible data breach that is likely to result in serious harm. If you see or experience a data breach involving a CPS employee, subcontractor or service provider, please report it without delay to CPS's Privacy Officer at cps@cpstech.com.au.

If you wish to obtain a copy of any personal information we hold which relates to you or make a complaint relating to our collection or use of personal information, please contact our Privacy Officer using the details provided above. Please note that we will require you to adequately identify yourself when requesting a copy of your personal information. We aim to respond to any complaint within 30 days and act reasonably in resolving all complaints.

If you are unsatisfied with the response from CPS, you may wish to address your complaint to the Australian Information Commissioner at: Office of Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001, email: enquiries@oaic.gov.au.