

## 1. SCOPE

In this policy, “us”, “we” and “our” means Fyfe Pty Ltd ABN 57 008 116 130 and its related bodies corporate.

This policy sets out:

- what kind of information we collect;
- how we collect it;
- why we collect it;
- how we use it;
- how we disclose it;
- management and security;
- accuracy and currency;
- how to seek access to and update your personal information; and
- how to contact us.

We are bound by the National Privacy Principles contained in the Privacy Act 1988 (Cth).

We will, from time to time, review and amend this policy, including taking into account new laws and amendments to the law. All personal information held by us will be governed by the most recently updated policy.

## 2. WHAT INFORMATION WE COLLECT

Generally, the personal information we collect about you includes, but is not limited to, your name, contact details, financial information, employment history and experience, qualifications and possibly, medical history and information.

## 3. HOW WE COLLECT THE INFORMATION

Whenever it is reasonable and practicable to do so, we only collect personal information about you, directly from you or from a service provider with your consent.

We may collect your personal information when you request or acquire a service from us, provide a service to us, complete a survey or questionnaire or when you communicate with us by email, telephone or in writing (for example, if you contact us to make a complaint or provide feedback).

## 4. WHY WE COLLECT THE INFORMATION

The primary purpose for which we collect personal information about you is to either provide you with a service you have requested or to receive and manage the provision of services from you in accordance any applicable contract and with our policies and procedures.

We may advise you of a more specific purpose at the time we collect your personal information.

If you do not provide us with the information that we have requested, we may not be able to provide you with our services or engage you to receive a service from you. For example, if you are a contractor to us and do not register for our online induction, you will not be able to attend the online induction.

## 5. HOW WE USE THE INFORMATION

In addition to the primary purpose outlined above, we may use the personal information we collect to:

- communicate with you;
- provide you with news and information about our services;
- for purposes necessary or incidental to the provision of services by you or to you;
- manage and enhance our services;
- investigate any complaints about you or by you, or if we have reason to suspect that you are in breach of any contract, policy or procedure; and
- fulfil our legal obligations under any applicable laws.

## 6. HOW WE DISCLOSE THE INFORMATION

We may disclose personal information, and you consent to us disclosing your personal information to other members of the Fyfe Group (in which case, your personal information will be collected, used, disclosed, managed and stored in accordance with this policy).

We may also disclose personal information, and you consent to us disclosing your personal information, to third parties:

- authorised by you to receive information held by us;
- such as our clients if you are providing subcontract services to us;
- as part of any investigation into you or your activities, for example, if we have reason to suspect that you have acted in breach of any contract, policies or procedures or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary to the police or relevant authority or enforcement body;
- as part of a sale or proposed sale of all or part of our business; and
- as required by any law.

In addition, we may disclose personal information to overseas recipients, where:

- the overseas recipient is a client or subcontractor for a project in which you are involved; or
- we have engaged an overseas recipient to provide services to us, such as cloud-based storage solutions.

Personal information may be sent to a member of the Fyfe Group in the Philippines. Other countries in which such recipients are located will depend on the nature of the services being provided by you or us and the particular project. We will, where practicable, advise you of the countries in which overseas recipients are likely to be located.

## 7. MANAGEMENT AND SECURITY OF THE INFORMATION

We will take all reasonable steps to protect the personal information that we hold from misuse, interference, loss or unauthorised access, modification or disclosure.

However, you acknowledge that the security of communications sent by electronic means cannot be guaranteed and that you provide information to us via the internet at your own risk. We cannot accept responsibility for misuse or loss of or unauthorised access to your personal information where the security of the information is outside of our control.

## 8. KEEPING THE INFORMATION ACCURATE AND UP TO DATE

We will take all reasonable steps to ensure that all personal information we hold is as accurate, up to date and complete as possible. You may contact us at any time and ask us to correct the personal information we hold about you if you believe the information we have is inaccurate or incomplete.

## 9. ACCESSING AND UPDATING YOUR INFORMATION

Subject to some exceptions in the Privacy Act, you have the right to seek access to and update the personal information we hold about you. We may charge a fee to cover the cost of meeting your request.

If you would like to request access to the personal information we hold about you or if you have any queries or complaints about how we collect, use, disclose, manage or store your personal information, please contact us at:

Privacy Officer  
Fyfe Pty Ltd  
Level 3, 80 Flinders Street  
Adelaide SA 5000

Or by email: [privacy@fyfe.com.au](mailto:privacy@fyfe.com.au)

Queries or complaints may be made anonymously or using a pseudonym unless it is impracticable for us to deal with you if you have not identified yourself or have used a pseudonym.

## 10. OWNER OF POLICY

Name:	Emma Christie	Position:	General Counsel
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