



Background

Broadpectrum Pty Ltd and its related companies ('**Broadpectrum's**', '**we**', '**our**' or '**us**') as collectors and users (i.e. data controllers) of personal information are bound by privacy laws in various jurisdictions. Accordingly, the Broadpectrum board of directors (the **Board**) and senior management have endorsed this *Privacy Policy* to support the *Broadpectrum Code of Business Conduct* and compliance and governance framework.

By providing your personal information, you are consenting to the Privacy Policy and to such collection, access, transfer, storage and processing of your personal information as described in this Policy.

Purpose of this Policy

This Privacy Policy applies to all information we collect about you whether on-line or otherwise and outlines what sort of information, including personal information, we hold, the purposes for which it is held, and how that information is collected, held, used and disclosed.

Scope

This Policy applies to:

- ▶ Broadpectrum as collectors and users of personal information, and
- ▶ Broadpectrum directors, officers, employees, consultants, contractors and any other parties acting as representatives or agents of Broadpectrum, as well as external parties (such as customers, service providers, shareholders and job applicants) who provide personal information to Broadpectrum

Sources of legal obligations

The sources of legal obligations behind this Policy include *Australia's Privacy Act 1988* (Cth) and the *Australian Privacy Principles* contained in that Act, and privacy laws in the countries in which Broadpectrum conducts business.

To the extent that the applicable laws of a country in which Broadpectrum operates conflict with or impose a higher standard than this Policy, the applicable laws must be complied with.



What sort of information do we collect?

We collect information, including personal information about you that is relevant to our business relationship with you or your employer. For example, we may collect an individual's name, contact details, information about our interaction with them and other relevant details that will assist in our business dealings and associated business development. However, we will endeavour to advise you where it is possible for you to deal with us on an anonymous basis.

If you apply to work for us as an employee or seek to provide your services as a contractor we may require you to undergo a pre-placement health assessment which will involve the collection of sensitive information, including health information. We may also engage third parties to conduct background checks.

In some cases, BroadSpectrum may be required by law to collect certain personal information. If we do not collect your personal information, we may not be able to process your application provide you with services, or deal with you.

Employee Records exemption

In certain countries, for example Australia, personal information regarding current or former employees that relates to their employment may be exempted from the requirements of the relevant privacy laws. To the extent permitted by law, BroadSpectrum may rely on these exemptions.

If you become our employee, the personal information provided to us during the recruitment process will become part of your employee record and this Policy will not apply to the extent that we use the information in relation to your employment with us.

How do we collect personal information?

We usually collect personal information about you when you are in contact with us, including over the telephone, when you send us correspondence (e.g. by letter, facsimile or email) or when you have contact with us in person.

We may also collect personal information that you submit to our website such as resumes and email addresses. If you provide us with a resume or similar employment related materials, we will use that information for the purpose of processing and responding to your application for employment and may retain that information in order to consider you for other positions with us as they become available.

We use cookies to improve your online experience. Any data collected is only used for automating the tasks in your web session. You can disable cookies at any time via your web browser's security settings. Disabling cookies will have no effect on your web session other than the fact that you will need to re-enter data that would normally be stored by the cookie.

Where practical, we will collect your personal information from you directly. However, we may also collect your personal information from a third party. For example, we may collect personal information through our interactions with third parties with whom we do business, such as clients who use our services and contractors or suppliers we engage to assist us in the provision of those



services. We may also collect your personal information from referees you have nominated in any job application.

How do we use personal information?

We use personal information to enable us to provide operational, maintenance and asset management services, or recruitment purposes, to communicate with our shareholders, to respond to your inquiries, for business development including of existing and prospective customers, website improvement and marketing purposes including undertaking data analytics, research and sending you electronic marketing communications where you have consented to receiving such communications, and for other purposes as described in this Policy. You may opt out of receiving marketing communications from us at any time, by following the opt out instructions provided in such marketing communications. We will not use your personal information for any other purpose unless you consent to such use by us, such uses as are disclosed to you when we collect the information or as otherwise permitted or required by law.

Do we disclose personal information to others?

We may transfer or disclose personal information to the following parties ('**Third Parties**');

- ▶ Other companies within the Broadspectrum group and their employees
- ▶ External service providers, such as contractors, consultants (including information technology consultants) or suppliers who we engage in the provision of our services as data processors and auditors, taxation and legal advisers. These third parties are only permitted to use the information for the services or function for which they have been engaged, and are required to have in place reasonable safeguards for protecting personal information
- ▶ Regulatory bodies, government agencies and law enforcement bodies, and
- ▶ Other parties as permitted or required by law.

We may also transfer personal information in connection with a merger or sale involving all or part of Broadspectrum or as part of a corporate reorganisation or share sale or other change in corporate control, including a bankruptcy.

In using and storing your personal information and/or in disclosing your personal information to the Third Parties or otherwise providing any of the Third Parties with access to your personal information, we may be required to transfer your personal information to jurisdictions other than the jurisdiction in which you reside. When permitted or required by law, your personal information may be stored, accessed, maintained and/or processed by us and our external service providers, who may be located in Australia, Canada, Chile, the Peoples Republic of China, India, the Republic of Nauru, New Caledonia, New Zealand, Papua New Guinea, the Republic of the Philippines, Qatar, the Kingdom of Spain, United Arab Emirates, the United Kingdom of Great Britain and Northern Ireland and/or United States of America.



What do we do to keep personal information secure?

We, take reasonable and appropriate steps, and require our service providers to take reasonable and appropriate steps, to protect personal information from misuse, loss and unauthorised access, modification or disclosure using physical, electronic and procedural safeguards. To keep electronic information secure, we use a range of security measures, such as restricting access to users who have a valid username and password.

Is the personal information up-to-date?

We endeavour to make sure that the personal information which we hold is accurate, complete and up-to-date. If we are notified that the information we hold is not accurate, complete or up-to-date, we will take steps to validate the information and ensure that it is corrected, if necessary, or note the requested changes to the information.

If you believe that the personal information that we hold about you is incorrect, incomplete or inaccurate you may request amendment of it by contacting our Privacy Officer in writing at the following email address: privacy@broadpectrum.com.

If we do not make the correction sought, you may request that there be an attachment to the information that states the correction was sought but not made.

What do we do with personal information when it is no longer needed?

We take steps to destroy or de-identify personal information that is no longer needed for the purposes for which it was collected if we are no longer required by law to retain it, using secure methods to destroy or de-identify the information.

We will also take steps to destroy or delete your personal information if we receive written notification from you withdrawing your consent to our storing and processing of such information or requesting that we destroy or delete such information where we are not otherwise required by law to retain your personal information.

Do we allow access to personal information?

In most circumstances we allow an individual to access the personal information we hold about them. However, access may be denied where we are permitted or required by law to deny access to such information.

If we refuse to provide you with access to your personal information, we will generally provide you with reasons for the refusal.

If we do not hold the personal information you request, you will generally be informed in writing.



What is our procedure for handling privacy inquiries or complaints?

Any questions, enquiries or complaints relating to this Privacy Policy or our privacy practices or procedures, including requests for access to personal information or amendments to information, should be directed to our **Privacy Officer**: privacy@broadpectrum.com

We aim to resolve any enquiries promptly. We may charge external parties a fee to cover the reasonable costs incurred by us in providing you with access to your personal information, such as photocopying, administration and postage costs.

If you make a complaint you will need to provide our Privacy Officer with sufficient details about your complaint in addition to any supporting evidence or information. We will contact you if we require any further information from you and will notify you in writing of the outcome of the Privacy Officer's investigation. If you are not satisfied with the Privacy Officer's determination, you can contact us to discuss your concerns or contact the Australian Privacy Commissioner via www.oaic.gov.au.

Training and Communication

Broad Spectrum regularly communicates this Policy to Employees across Broad Spectrum through established communication channels. Employees will also receive regular training on supporting this Policy in the scope of their employment with Broad Spectrum.

Consequences for breach of this Policy

Breach of this Policy:

- ▶ could expose a person to civil or criminal liability;
- ▶ will be regarded by Broad Spectrum as serious misconduct which may lead to disciplinary action, including termination of employment or contract; and
- ▶ could expose Broad Spectrum to fines or financial penalties for breach of privacy laws.

Review of this Policy

The Group Executive, Legal and Governance is responsible for keeping this Policy up to date, a formal review will take place every two years, and the Board is responsible for approving this Policy.

Related documents

This Policy should be read in conjunction with Broad Spectrum's other documents including: [Code of Business Conduct](#).