

PRIVACY POLICY

This Policy sets out the requirements for privacy across Bryant Building Contractors Pty Ltd and related companies, such as Bryant Resourcing Pty Ltd (**Bryant**).

This Policy applies to all employees of Bryant and third parties engaged by Bryant.

The **objectives** of this Policy are to treat personal information in accordance with the *Privacy Act 1988 (Cth)* (the **Privacy Act**) and the Australian Privacy Principles (**APPs**).

1. What personal information do we collect?

Personal information is any information which can be used to identify an individual.

Sensitive information is a subset of personal information which includes information about an individual's race or ethnicity, political or religious beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences, criminal record and health information.

Personal information will not be shared, sold or disclosed by Bryant other than in accordance with this Policy, without an individual's permission, or in accordance with the Privacy Act.

Bryant only collects, holds, uses or discloses personal information where it is reasonably necessary to:

- enable Bryant to deliver services or information to individuals or to an organisation;
- for hiring purposes;
- maintain or establish a business relationship, including with a customer, supplier, contractor, or employee;
- enable Bryant to assist to provide services or to improve, and better understand preferences in respect of Bryant services; and
- fulfil its legal or regulatory obligations.

Bryant generally collects personal information directly from the individual to whom it relates, except where that individual has consented to Bryant collecting the personal information from a third party (such as a recruiter), the law otherwise permits Bryant to do so, or where it is unreasonable or impracticable to collect it directly. Bryant only collects sensitive information directly from individuals with their consent (such as health information), or where required, it is authorised or otherwise permitted to collect the information from a third party by law.

Personal information may also be collected from, and disclosed to, third parties in the course of business activities. For example, during a recruitment process steps may be taken to verify the accuracy and completeness of the information and, in appropriate circumstances, health checks, credit checks or criminal records checks may be carried out in accordance with our Health and Safety policies.

An individual has the option, where lawful and practicable, not to be identified when communicating or entering into transactions with Bryant (including by the use of a pseudonym). However, in most circumstances, it will be impracticable for Bryant to do business with an individual or provide the services required by an individual unless personal information is provided.

2. Purposes for which we collect, hold, use and disclose personal information

Personal information will be stored in Bryant's systems for immediate business and administration purposes, as detailed above, and may be used or disclosed for the purpose for which it was collected, or for a related purpose which someone may reasonably expect. Sensitive information will only be disclosed for a purpose which is directly related to the purpose for which it was collected.

Personal information may be disclosed between related bodies corporate within Bryant.

Bryant may also disclose or use personal information (including to overseas recipients):

- to third party service providers and business associates, who provide services in connection with its business. These third parties may be located locally or overseas.
- with the individual's consent;
- where required, authorised or permitted to do so by law;
- to a person authorised to act on the individual's behalf; or
- as required by law and specifically to any government agency if Bryant believes in good faith that it must do so to comply with the law or that doing so is required to prevent, detect, investigate or remedy improper conduct potentially affecting it.

Where BRYANT holds or transfers personal information outside Australia, it will meet the safeguards set out in the Privacy Act. Where personal information is held or disclosed overseas, all reasonable steps will be taken to ensure that the recipient will handle the information in a manner consistent with the Privacy Act and in the case of the European Union the *General Data Protection Regulation (2016/679)*.

3. Confidentiality and security

Bryant is committed to:

- safeguarding all personal information provided to Bryant;
- ensuring that personal information remains confidential and secure; and
- taking all reasonable steps to ensure that personal privacy is respected.

Bryant maintains physical, electronic and procedural safeguards to protect personal information from misuse, interference, unauthorised access, modification or disclosure, and loss or corruption by computer viruses and other sources of harm. Access to personal information is restricted to those employees and third parties who need to know that information.

In accordance with the Privacy Act, Bryant is required to notify you and the Office of the Australian Information Commissioner (**OAIC**) if it becomes aware of a data breach (such as an unauthorised disclosure of or unauthorised access to data, or a loss of data) where that breach is reasonably likely to result in serious harm. This will apply even if your data is being held offshore.

4. Accessing or correcting personal information

In most circumstances, Bryant will make available to an individual upon their request any personal information held about them. Requests to access personal information may be made at any time. Bryant will respond to a request within a reasonable time, and in the manner requested, unless there is a legal or administrative reason preventing us from doing so.

Reasonable steps will be taken to ensure the personal information held is accurate, complete, up to date, relevant and not misleading before it is used or shared.

An individual may request that personal information be corrected or supplemented if the individual believes the information held by Bryant is inaccurate or misleading. If Bryant agrees, the change will be made. If Bryant disagrees, Bryant will advise the individual and include a notation on the record that the information's accuracy is disputed.

If personal information changes, or if an individual believes that the personal information held by Bryant is no longer accurate or complete or has been the subject of a data breach, the individual should contact the Privacy Officer.

5. Privacy Officer Contact Details

By email	brisbane@bryantbc.com.au – Attn: Privacy Officer
By post	The Privacy Officer, Bryant Building Contractors, Unit 3/31 Anthony Street, West End QLD Australia 4101

Bryant will respond to requests to correct or supplement personal information within a reasonable time period.

6. Destruction and de-identification of personal information

Records management policies govern the archiving and destruction of records which include personal information.

If unsolicited personal information is received, reasonable steps will be taken to destroy or de-identify that personal information.

7. Complaints

If an individual has a question, concern or complaint regarding the way in which personal information is handled, or believes that Bryant has breached its obligations under the Privacy Act or has failed to comply with this Policy, they should make a complaint in writing to Bryant's Privacy Officer.

Bryant will review and respond to any complaint as soon as possible, and generally within 30 days of receiving it.

If an individual is not satisfied with Bryant's response, the complaint can be referred to the OAIC. The OAIC process for referring a complaint is available at: <https://www.oaic.gov.au/privacy/privacy-complaints/>

Date: July 2021

Note: Bryant reviews and updates this Policy from time to time to reflect its current information handling practices and changes to legal requirements. Bryant will notify changes by posting an updated version of the Policy to the Bryant website.