

POL-010 Privacy Policy

1 Purpose

Degnan is subject to the Australian Privacy Principles contained within the Privacy Act 1988 (“Act”).

The purpose of this policy is to describe how Degnan collects, holds, uses and discloses personal information and complies with the privacy requirements in protecting the personal information Degnan holds about individuals.

2 Personal Information

Personal information is defined in the Act as “information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- Whether the information or opinion is true or not; and
- Whether the information or opinion is recorded in a material form or not”.

3 Collection of personal Information

The types of personal information Degnan collects will depend upon what dealings the relevant individual or entity may have with Degnan. Degnan may collect and hold information about:

- **Degnan employees:** personal information such as contact details, banking details, date of birth, other payroll details, superannuation information, tax file number and emergency contacts. Information submitted and obtained in relation to absences from work due to leave, illness or other causes. Information submitted and obtained in relation to Workers Compensation Claims and Injury Management. Any other information obtained during the course of employment.
- **Candidate information:** personal information such as contact details, employment history and other background information as required and as permitted by law in connection with applications for employment. Personal information such as contact details, employment history and other background information as required and as permitted by law in connection with applications for contracting projects/assignments.
- **Degnan website enquiries:** information that allows Degnan to respond to enquiries made through the Degnan website, such as name, contact number and email address.
- **Degnan website subscribers:** information that allows Degnan to communicate with website subscribers, such as name and email address. Degnan will only do so where individuals have “opted in” to receive this information.
- **Suppliers:** information required to establish and maintain records and systems to enable payment for goods and services. Any other information obtained to assist in managing client and business relationships.
- **Individuals as contractors:** information required to establish and maintain records and systems to enable payment for services.
- **Degnan investors:** personal information such as contact details in order to respond to enquiries and/or provide information.
- **Degnan clients or prospective clients:** information obtained in order to deliver services, such as name, address, e-mail address and phone number, company, work email, work address, role and job function, years of experience. Any other information obtained to assist in managing client and business relationships.
- **Other individuals** who may come into contact with Degnan.

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The Act imposes restrictions on collecting sensitive personal information. This includes information about religious views, ethnicity, political opinions and personal health information. Degnan generally does not collect sensitive personal information about an individual, except in the below instances:

- where a pre-employment medical is undertaken as part of the selection and onboarding process, and any medicals undertaken during the course of employment as required under relevant legislation and government client contractual requirements.
- for the purpose of collecting information for Corporate Social Responsibility and sustainable procurement reporting for our government clients.
- for the purpose of fulfilling Degnan's drug and alcohol testing requirement under relevant legislation and government client contractual requirements.

All reasonable safeguards will be maintained to protect personal information against unauthorised access, alteration, disclosure, misuse or loss. In addition, only authorised personnel shall have access to personal information.

4 Use and Disclosure of Personal Information

Degnan's policy is to only use personal information for the purpose which was either specified or reasonably apparent at the time the information was collected. Degnan may also use or disclose the information collected for any other related purpose for which the individual would reasonably expect it to be used.

If Degnan wishes to use or disclose personal information in other circumstances, the individual's consent would need to be obtained.

Degnan deals with personal information for a number of purposes, such as:

- Performing payroll functions.
- Recruiting of employees and contractors.
- Improve and maintain the administration of employee benefits.
- Operate IT and communication systems.
- Internal business operations such as communicating with clients and suppliers.
- Distribution of subscription emails.
- Responding to Degnan website enquiries.
- Managing Degnan's everyday business needs such as payment processing, communicating with individuals and other companies about Degnan's services, contract management, analytics, corporate governance, reporting and legal compliance.

5 Disclosing information to other parties

Degnan restricts its sharing of an individual's personal information. In using personal information, Degnan may need to disclose personal information to various third parties, sometimes outside of Australia. These include, but are not limited to:

- Degnan's contractors and service providers who assist Degnan in the operation of its business or to provide a customer service. Degnan may share personal information with its service providers and contractors, who are bound by law or contract to protect the personal information and only use the personal information as necessary to perform their services.
- Third party lenders and insurers.

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- Anyone authorised by a provider of personal information
- Relevant parties in situations when Degnan is required by law to provide the information
- Legal and regulatory authorities (such as the Australian Taxation Office), to accountants, auditors, lawyers and other outside professional advisers.

Although most recipients of personal information are within Australia, others may be located or have relevant operations elsewhere. Therefore, it may be necessary to transfer personal information abroad. Some of the countries to which information is transferred may not have laws regulating the collection and disclosure of personal information. In this instance, Degnan will take reasonable steps to ensure that any recipients of personal information comply with the Act.

Degnan understands that individuals do not want Degnan to provide their personal information to third parties for their own marketing purposes and will not do so unless that individual has provided their consent for Degnan to do so.

6 Cookies and other data collection technologies

In relation to Degnan website usage, Degnan collects certain information by automated means, using technologies such as cookies and browser analytics tools.

For example, when Degnan's website is visited, Degnan places cookies on the individual's computer. Cookies are small text files that websites send to computers or other internet connected devices to uniquely identify the browser or to store information or settings in the browser. In many cases, cookie preferences can be managed, and the individual can opt out of having cookies and other data collection technologies used by adjusting the settings on their browser.

The information Degnan collects using cookies and other tools is only used in a non-identifiable way, without any reference to personal information. For example, Degnan uses information it collects about all website users to optimise Degnan's website and to understand website traffic patterns.

7 Applying for employment with Degnan

Degnan collects personal information from individuals who submit applications with Degnan. If the application is unsuccessful, Degnan may retain the information in case a more appropriate opportunity becomes available. The unsuccessful candidate can then contact Degnan to request Degnan not to retain the applicant's information.

8 Security of personal information

Degnan will take reasonable steps to protect personal information that it holds from unauthorised access, modification, misuse, interference and loss.

Internally, Degnan restricts access to personal information to employees or parties who need access to the information in order to do their jobs. These employees are limited in number and are committed to maintaining confidentiality.

9 Access and changing personal information

Degnan respects the right of an individual to access and amend their personal information. Degnan will give individuals access to their personal information on request, subject to the Act. If any information is incorrect, out of date, incomplete, irrelevant or misleading, Degnan will amend it upon request.

Degnan may require substantiation of any request to access or amend personal information.

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10 Complaints

An individual can make a complaint about the way in which Degnan has handled an individual's personal information by sending an email to:

General Manager, People & Business Improvement.

Degnan will endeavour to act promptly in response to a complaint.

If you are not satisfied by Degnan's response to your complaint, you can contact the Australian Privacy Commissioner at its website www.oaic.gov.au or by phoning 1300 363 992.

11 Additional information in privacy

For further information about privacy issues and the protection of privacy, visit the Office of the Australian Information Commissioner's website at www.oaic.gov.au