

## PRIVACY STATEMENT

### Our Commitment

The Canstruct Group and affiliates (collectively referred to as Canstruct) takes privacy seriously and is committed to ensuring that all personal information it collects or holds is dealt with in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (Act).

By using our website or otherwise engaging with us, you agree to and accept the contents of this Privacy Statement.

### Purpose

The purpose of this Statement is to outline the types, and circumstances, of personal information collected by us, and how we handle, use and disclose personal information.

This Statement does not apply to employee records which are defined in the Act as records of personal information relating to the employment of an employee. However, it does apply to personal information that is collected for recruitment purposes.

### What is personal information

Personal information is 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 material form or not.

### What types of personal information do we collect?

The types of information that may be collected will depend on our relationship with you. It may include basic personal information such as your name, occupation, place of work, address and contact details and any additional information that you provide to us in your dealings with us. Where we are required to make payments to you we may also collect your bank account information.

For recruitment purposes, we may collect your name, address, contact details, current and past employment information, details of educational qualifications and professional associations. We also collect information about your residency status, the name and contact details of your referees and other information required for recruitment purposes. We may also seek additional proof of identity documentation for the purposes of carrying out background checks. Some of this information may also be sensitive information.

For visitors to Canstruct's premises or sites, we may collect your name, organisation, contact details and any other information that may be reasonably necessary for health and safety purposes. We also have CCTV in operation at our head office.

## Sensitive Information

We collect personal information that is classified as sensitive information under the Act. For example, in an employment application we ask you about any criminal convictions that you may have. We also collect information from medical providers for the purposes of pre-employment medical fitness examinations prior to deployment to remote sites.

We may also collect sensitive information about our contractors, subcontractors and others as part of their business with Canstruct. For example, we may be required to arrange domestic or international travel for contractors and guests or other visitors. The type of information collected may include but is not limited to the proof of identity documentation, passport details, information required for visa applications and travel, including medical reports and background checks. We may also receive sensitive information relating to insurance claims.

Unless we are required or permitted by law to collect sensitive information about you, we will only do so by obtaining your consent. We will always explain the purpose for collecting sensitive information.

## Can you deal with us anonymously?

You can always decline to give us any personal information that we request, but that may mean we cannot continue our relationship with you, for example, we may not be able to provide you with some or all of the services you have requested or consider your employment application. If you have any concerns about personal information we have requested, please let us know.

You have the option to deal with us anonymously or by pseudonym where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for Canstruct to deal with individuals anonymously or pseudonymously on an ongoing basis.

## How do we collect personal information?

We usually collect information from you directly unless you have consented to us collecting your personal information from a third party or the law permits us to do so, or if it is unreasonable or impracticable for us to do so. We may collect information from you in person or over the phone, via your use of our website and social media, or in written form including by you submitting an application or form to us.

We may also collect personal information from a third party such as credit reporting agencies, medical providers, government entities or a publicly available source.

## Visitors to our Website

When you visit the Canstruct website, our server records your visit and logs certain information for statistical and diagnostic purposes only. A tracking cookie is used which identifies the user over an entire browsing session and also over repeat visits to the website.

Information that may be collected includes:

- Requesting IP address;
- Type of browser being used;
- Date and time of the visit;
- Pages and resources accessed and downloaded;
- Previous site visited; and
- User ID used to access the page, if any.

## CCTV monitoring

Canstruct's head office is protected by Closed Circuit Television (CCTV). Canstruct uses CCTV systems for 24-hour video surveillance, which monitors and records activity in the main entrances and foyer and all around the external premises.

The purpose of this monitoring and recording is to provide a safe and secure work environment for Canstruct staff and visitors as well as members of the public.

Video surveillance is being used to deter any form of aggressive, harmful, or unlawful behaviour and to assist in identifying offenders. Should an incident occur, the recordings may be provided as evidence to law enforcement authorities such as the police to assist with investigations or enquiries. CCTV and video footage is not used to monitor staff performance. However, it may be used to investigate allegations of serious misconduct by staff.

The images recorded by the cameras are securely stored as digital files within the CCTV software, which is only accessible to staff in the ICT Department. The digital files are stored for a maximum of two months after which they are programmed to be automatically erased unless it is relevant to a current investigation or is otherwise required by law enforcement authorities. Images are viewed only by authorised staff. Controlled access to the secured footage is strictly maintained. Copies of recordings will not be made for other purposes unless they are relevant to the purpose of surveillance or are required by law. Any copies made are stored in a securely lockable area.

Circumstances under which recordings will be shown to a third party include:

- Unlawful acts (police);
- Occupational health and safety complaints (e.g. Workplace Health & Safety Officer and Insurers); and
- When otherwise required by law (e.g. court order).

## How do we use your personal information?

We collect personal information so that we can perform our business activities and functions and to provide the best possible quality of service. The purposes for which we may collect personal information include, but are not limited to:

- Administering our relationship with you, including providing services to you, the sending of communications to you and responding to queries or complaints;
- Assessing or canvassing suitability for employment;
- Updating our records to keep your contact details up to date.;
- Immediate administrative or business functions including providing relevant personal information to our related bodies corporate, contractors, service providers, business partners or other third parties;
- Performing services for our clients, including government entities both in Australia and overseas; and
- Complying with any law or in co-operation with any government authority or agency.

## Disclosure to third parties

Personal information that we collect from you may be disclosed to:

- Any entity that we are required or authorised by law to disclose such information to (for example, law enforcement agencies and investigative agencies, courts, various other government entities);
- Our contractors, agents, client or business partners for purposes directly related to the purpose for which the personal information is collected;
- Our professional advisors and other contractors (for example our insurers, accountants, solicitors, IT consultants etc);
- A person authorised to act on your behalf; and
- Other third-parties with your consent.

## Disclosure to third parties outside of Australia

Canstruct is a global organisation and works with clients, service providers and commercial interests overseas including current operations in Nauru. It is possible that your personal information will be disclosed to overseas recipients.

In circumstances where your information is disclosed to overseas recipients, those recipients are likely to be located in countries in the regions in which Canstruct operates. Where personal information has been disclosed overseas, there is a possibility the recipient may be required to disclose under a foreign law.

Unless we have your consent, or an exception under the Australian Privacy Principles applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to your personal information.

## Storage and Security of personal information

We may hold your personal information in either written or electronic form on our servers and computers physically. Canstruct will take reasonable steps to protect your personal information from misuse, interference and unauthorised access or disclosure. If we become aware of a data security breach, we will report it as required by law.

Canstruct maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, for example, we use firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

Personal information is destroyed, deidentified or archived when it is no longer required.

## Accessing and correcting your personal information

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information, we hold about you and letting us know if your personal details change.

If you consider any personal information, we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

To request access to your personal information please contact our Privacy Officer using the contact details set out below.

## How to make a complaint

If you have a complaint in relation to the way in which your personal information is being handled by Canstruct, please contact our Privacy Officer using the contact details set out below.

The Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week. If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that we may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner.

## How to contact us

The contact details for Canstruct are:

Canstruct Privacy Officer  
PO Box 210, Brisbane Markets, QLD 4106 Australia  
Email: [privacy@canstruct.com.au](mailto:privacy@canstruct.com.au)  
Phone: +61 7 3716 2000

## Changes to this Policy

We may make changes to this Privacy Policy from time to time for any reason. We will publish changes to this Privacy Policy on our website.

This Privacy Policy was last updated in November 2021.