1. PRIVACY POLICY

Pacific Complete (a joint venture between Laing O'Rourke and WSP|Parsons Brinckerhoff (we, our, us, PC or Pacific Complete)) recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information and we are committed to keeping such personal information accurate and private. This document is our privacy policy and, together with any terms of use of our website and systems or collection statements, sets out how we collect and manage your personal information. We respect your rights to privacy under the Privacy Act 1988 (Cth) (PA Act), and as the delivery partner to the Roads and Maritime Services for the Woolgoolga to Ballina Pacific Highway Upgrade (Program) under the Privacy and Personal Information Protection Act 1998 (NSW) (PPIP Act), and we comply with all legislative requirements in respect of the collection, management and disclosure of your personal information, as well as any laws relating to workplace surveillance legislation.

Our Code of Conduct and Ethics is available on our website and sets out the guiding principles and standards we apply, including in the management of personal information. We expect the same principles and standards from those with whom we do business.

This privacy policy applies to personal information we handle about our business partners, employees, staff, visitors to our website, individuals who access our sites/premises and other members of the public, including any third parties with whom we interact with as a result of our role on the Program.

2. WHAT INFORMATION DOES THIS PRIVACY POLICY APPLY TO?

When used in this privacy policy, the terms "personal information" or "sensitive information" have the meanings given to them in the legislation.

**Personal information** is any information (including an opinion) about you where your identity is apparent, or that contains details that may identify you. It may include your name, date of birth, address, postcode, telephone numbers and email address. It includes sensitive information.

**Sensitive information** is a particular type of personal information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health. In certain circumstances we may collect sensitive information about you.

The type of personal information we collect and manage may include:

- Your name, address, employer, company or business name, email address, date of birth and gender
- Your nationality, ethnic origin, residency/immigration status
- Your contact details (including but not limited to your telephone number, facsimile, email address, emergency contact details, next-of-kin, beneficiaries, dependents, etc.)
- Identification documents such as passport, utility bills and driving licence details
- Your qualifications, experience and employment history (including third party references)
- Your company or business capability and capacity and history
- Your medical history and other health information
- Your driving and insurance claims history (where you operate our vehicles or plant)
- Your tax file number
- Bank account details
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- Other information you may have provided as part of an application for employment with (or your engagement by) us or RMS or which we may have obtained as part of your application for employment or tender with us, RMS, business partners and supply chain organisations including industry, geographic location, business nature, age of company, size of company, annual revenue, number of branches, number of employees, workforce type and details including criminal records history;
- Information regarding employee and staff remuneration assessment, performance review and personal development plans
- Courses and programs attended by our employees and staff or employees and staff of our (or RMS) business partners and supply chain organisations
- Details of your remuneration or company charges, including any superannuation contributions, salary packaging arrangements, associated benefits and rewards, fee and contractual rate history.
- Drug and alcohol testing data
- Incident and accident details in which you are (or may have been) involved, including audio, images and tracking data from surveillance and CCTV systems
- Any additional information relating to you that you provide to us directly or indirectly through use of our website, tender process or online presence, through our representatives or otherwise

3. WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD, HOW IS IT COLLECTED AND WHY?

We only collect personal information that is necessary for us to manage our business and the Program effectively, to develop and promote our services and to assist us with complying with our legal and regulatory obligations.

Generally, we try to collect personal information directly from you but, occasionally, we may collect personal information from publicly available records, third parties and/or other sources. We will only collect personal information about you from publicly available records, third parties and/or other sources if it is unreasonable or impracticable to collect it from you directly.

We will only collect sensitive information about you if we have your consent or we are permitted or required by law to collect the information.

The ways we collect personal information include:
- during the recruitment and engagement of employees and staff, including reference checking and agency searches
- as part of training, induction and on-boarding programs
- our dealings with government agencies, including RMS
- our dealings with clients, contractors, subcontractors, suppliers and other service providers
- during conversations between you and our representatives or RMS representatives
- through access to our website or other web based data collection systems for the Program, including TeamBinder
- tender applications for services or works
- your expression of interest in Program opportunities provided to our business partners, contractors and supply chain organisations
- access control systems and registers for individuals accessing our sites and premises
- random drug and alcohol testing on operatives on our sites and premises
- monitoring and surveillance systems, including CCTV systems
- from social media web sites and blogs
- through third party companies engaged to undertake credit reference and due diligence checks on individuals and organisations with whom we engage in the operation of our business
- incident and accident investigations
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If we receive your personal information and we did not request it, then we will determine, within a suitable time after receiving (or becoming aware of having received) that information, whether it is reasonably necessary for us to retain that information and in the case of sensitive information, whether you consented to the collection. If not, we will de-identify or destroy the information.

Regardless of how we obtain the information, we will take reasonable steps to ensure that you are aware of the way we are collecting the information, any laws requiring the collection, who we usually disclose it to and any consequences for you if we are not provided with the information.

4. PASSIVE INFORMATION COLLECTION

As you navigate through our website or otherwise use our equipment, systems and technology, we may collect information about your computer, including, where available, your IP address, operating system and browser type, for system administration. This is statistical data about our users’ browsing actions and patterns, and does not identify any individual.

We use ‘cookies’ which are small text files placed on your computer by a web page server which may later be retrieved. A cookie enables us to recognise your computer without the need for a fresh request you to register.

The cookies do not allow us to collect personally identifiable information about you. We collect your personal information directly from you unless it is unreasonable or impracticable to do so.

5. WHAT HAPPENS IF WE CAN’T COLLECT YOUR PERSONAL INFORMATION?

If you do not provide us with the personal information described in this privacy policy, some or all of the following may happen:

• we may not be able to provide you with information about products and services that you may want; or
• we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful;
• if you are expressing interest in broader Program opportunities, we may be unable to provide it to our business partners, contractors and supply chain organisations; or
• if you are applying for a position with us or tendering for works associated with the Program, we may be unable to consider your application or tender submission.

6. ANONYMITY AND PSEUDONYMS

You may submit information to us anonymously or by using a pseudonym unless we are required by law to insist that you identify yourself or it is impractical for us to deal with the information unless you have identified yourself.

Where you provide information by our phone reporting a breach of this policy or our Code of Conduct and Ethics, you may provide personal information on an anonymous basis. However, where you do not provide us with your name and contact details, we may be limited in our ability to investigate and deal with your complaint and under certain local laws (such as Australian Consumer Laws or the Corporations Act 2001 (Cth)) you may not be eligible for the legal protection provided to you by those laws to the extent your complaint relates to a breach of those laws.
7. FOR WHAT PURPOSES DO WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION?

We collect personal information so that we can perform our business activities and functions and to provide best possible quality of customer service.

We collect, hold, use and disclose personal information to enable us to properly operate, manage and administer our business and the Program, including for the following purposes:

- to provide products and services to you and to send communications requested by you
- to answer enquiries and provide information or advice about existing and new products or services
- to assess the performance and monitoring of the website and to improve the operation of the website
- to provide you with access to protected areas of our website and monitor use of our website
- to conduct business processing functions including providing personal information to business partners, supply chain organisations, our related bodies corporate, RMS, contractors, service providers or other third parties
- for the administrative, marketing, planning, product or service development, quality control and research purposes of Pacific Complete, its related bodies corporate, RMS, contractors or service providers
- if you have applied for a position with us or RMS, to evaluate your application
- obtaining credit references and conducting due diligence on individuals or representatives of corporate entities
- provide details of your business to companies that are:
  (a) interested in having your business provide a tender opportunity to you directly; and
  (b) entities that may be interested to contacting your business to provide services the management of our employees and staff and workforce in all of our business operations, including management planning and forecasting
- maintaining effective access, safety and security controls for our sites and premises;
- to provide your updated personal information to our related bodies corporate, RMS, contractors or service providers
- to update our records and keep your contact details up to date
- provision of health practitioner, health monitoring and emergency medical assistance services
- maintaining supplier and contractor databases (including where the supplier or contractor is a sole trader)
- compilation of and access to business contact databases
- management of operational assets
- investigation/prevention/detection/prosecution of unlawful or inappropriate activities
- where you are a representative of an organisation with whom we deal, in relation to the services that we provide to (and/or receive from) that organisation
- to process and respond to any allegation, complaint or specific inquiries made by you
- establishment and operation of our corporate banking accounts and systems
- management of claims, disputes and litigation proceedings arising out of our business
- engaging the services of external consultants, agents, temporary and casual works and other operatives
- to comply with any law, rule, regulation, policy, contractual obligation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country.
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8. YOUR PERSONAL INFORMATION WILL NOT BE SHARED, SOLD, RENTED OR DISCLOSED OTHER THAN AS DESCRIBED IN THIS PRIVACY POLICY

- RMS, our employees, business partners, supply chain organisations, related bodies corporate, contractors or service providers for the purposes of access or operation of our website (or other electronic data collection services, including TeamBinder) or our business, fulfilling requests by you, and to otherwise provide products and services to you. Those parties include, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants
- government agencies (including local tax authorities) and regulators as required or permitted by law
- our related companies, business partners, contractors, subcontractors, suppliers, consultants, clients and service providers for the purpose of our business operations
- specified persons in accordance with a request made by you (for example other employers, banks or property agents)
- suppliers, contractors and other third parties with whom we or RMS have commercial relationships for the Program, for business, technology, corporate and administrative services, marketing, and related purposes for the effective operation of our business; and
- any organisation or specified persons for any authorised purpose with your express consent.

We, RMS, our business partners, Program contractors or suppliers, use the personal information we collect to enable us to effectively and efficiently conduct our business. The precise use can vary, depending on the circumstances in which it was collected, including:

- for any of the purposes set out in the privacy policy
- to verify your identity and conduct credit and other verification checks
- to update your details and keep our records up to date
- to conduct business processing functions including providing information to our business partners, supply chain organisations, related companies, contractors, suppliers, service providers, business partners, clients and other third parties
- as part of tenders, bids and proposals you and others submit for the provision of works and services for the Program

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate (within Australia).

For personal information that is sensitive information, we will only collect, use or disclose that information where it is reasonably necessary in the operation of our business and we have received your consent to do it or it is permitted or required by law.

As part of our safety and security commitment to our employees and staff, clients and members of the public, we conduct camera, computer and tracking surveillance of our sites, premises, assets and business systems. If we intend to conduct surveillance activities which might affect you, we will give you notice of those activities as we are required under applicable law(s). Any surveillance activities will only be conducted by appropriate individuals and any resulting personal information collected will be held in accordance with this privacy policy.

We may also use your personal information for purposes related to those described above which would reasonably be expected by you or to which you have consented.

We may disclose your personal information in certain circumstances, such as where we are required or permitted by law, where you have consented to us doing so or for any of the purposes for which the information was collected.
9. DIRECT OPPORTUNITY COMMUNICATION MATERIALS

We may send direct communications and information about Program opportunities that we consider may be of interest to you, our contractors or suppliers. These communications may be sent in various forms, including mail, SMS, fax, email and tender systems (including eTender and TeamBinder), in accordance with applicable laws. You consent to those direct communications by any of those methods. In addition, at any time you may opt-out of such communications by contacting us (see the details below) or by using opt-out facilities provided in the Program opportunities communications and we will then ensure that you are removed from our mailing list.

10. HOW CAN YOU ACCESS AND CORRECT YOUR PERSONAL INFORMATION?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up to date, relevant and not misleading. If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it.

Where we have corrected your personal information we will take reasonable steps to communicate that correction to any third party with whom we’ve shared the information (unless it is impracticable or unlawful to do so). If we refuse to correct your personal information following a request by you to do so, we will:

- set out written reasons why this is the case and you may contact us to complain about that refusal (see contact information below)
- at your request (and where we are able to do so), associate with that personal information a statement that it is inaccurate, out-of-date, incomplete, irrelevant or misleading in such a way that the statement is apparent to users of the information.

11. WHAT IS THE PROCESS FOR COMPLAINTING ABOUT A BREACH OF PRIVACY?

If you believe that your privacy has been breached, please contact our Privacy Officer using the contact information below and provide details of the incident so that we can investigate it.

We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. Our Privacy Officer deals with privacy complaints and any complaints should be directed to our Privacy Officer using the contact details below. We will treat your complaints confidentially. We will contact you within a reasonable time after receiving your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will
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custom an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

12. DO WE DISCLOSE YOUR PERSONAL INFORMATION TO ANYONE OUTSIDE AUSTRALIA?

We may disclose personal information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above. Also, some of the information we collect is stored on cloud-hosted systems which may be outside of Australia.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

Privacy Policy and Statement covering the management of personal information outside of Australia is available from the PC members at the following websites:


13. SECURITY AND RETENTION OF PERSONAL INFORMATION

We take reasonable steps to ensure your personal information is protected from misuse, interference and loss and from unauthorised access, modification, disclosure or destruction. We may hold your information in either electronic or hard copy form.

Some of the measures we take are:

- insisting on confidentiality from our employees, staff and business partners in their use of information we provide to them and/or directing them to the principles we apply regarding personal information as identified in our Code of Conduct and Ethics;
- implementing document management controls, including TeamBinder
- using access control and security measures for our sites, premises, assets and business systems
- business continuity planning

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of information you communicate to us online or by tendering systems such as eTender or TeamBinder or once we have provided information to contractors or suppliers regarding Program opportunities for you. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

If personal information we hold is no longer reasonably necessary for a purpose identified in this privacy policy and we are not required by law to retain that information, we will take reasonable steps to de-identify or destroy that information.

14. LINKS

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.
15. CONTACTING US

If you have any questions about this privacy policy, any concerns or a complaint regarding the
treatment of your privacy or a possible breach of your privacy, please use the contact link on our
website or contact our Privacy Officer using the details set out below.

Please contact our Privacy Officer at:

Privacy Officer
Pacific Complete
Phone: 1800 712 879
Post: 17-19 Prince Street, GRAFTON, NSW, 2460
E-mail: privacyofficer@pacificcomplete.com.au

Our Privacy Officer will respond to you within a reasonable time and advise of any investigation
process. If you feel that we have not adequately dealt with any privacy compliant you have made to
us, you may wish to contact the appropriate data protection or privacy authority relevant to your
compliant.

16. CHANGES TO OUR PRIVACY POLICY

This Policy will be reviewed and updated annually and will evolve to meet the needs of the Program.
Any updated versions of this privacy policy will be posted on our website. Please review it regularly.
This privacy policy was last updated on 29 January 2016.

The Pacific Complete Board endorses this Policy.
We personally commit Pacific Complete to this Policy.

Christopher Wilkinson
Program Director

Peter Wellings
Deputy Program Director