

BK Civil Group Privacy Policy

BK Hire Pty Ltd ACN 153 715 578 trading as BK Civil Group ABN 99 153 715 578, its subsidiaries, related affiliates in Australia (together as "BK Civil Group", "we" or "us") are committed to protecting and managing personal information in accordance with the Australian Privacy Principles (APPs) established under the *Privacy Act 1988* (Cth) (**Privacy Act**) and in accordance with other applicable privacy laws.

This document is referred to as our **Privacy Policy**, and it sets out our policies for managing your personal information and sensitive information, including how we collect, use, hold, store and disclose your information.

In this Privacy Policy, "you" refers to any individual about whom we collect information. Broadly speaking, when we are referring to personal information, we are referring to information or an opinion about you, or information that is reasonably recognisable as you. It includes information or an opinion that may or may not be accurate and recorded in a hardcopy form or electronic.

When we refer to sensitive information, we are referring to certain personal information that is more sensitive and may include health information or details of memberships of professional associations. Under the APPs, sensitive information is afforded a higher level of privacy protection and requires us to obtain your consent before collecting this type of information.

This Privacy Policy applies to your personal information regardless of how we collect it from you. When you submit information to us, access or use our websites, applications, or social media platforms, then you are providing your consent to us collecting and managing your personal information in accordance with this Privacy Policy.

About BK Civil Group

BK Civil Group is Australian based and owned civil construction and plant hire company based at Cambooya on the Darling Downs in Queensland. Servicing the eastern seaboard, we have completed projects in multiple sectors including infrastructure, mining & resources, oil and gas, agriculture, construction, road, rail, local and state government. Please contact us for a full list of the companies and businesses which comprise BK Civil Group and which are subject to this Privacy Policy.

What information we collect about you?

We will collect personal information (including sensitive information) that is necessary for, or related to, conducting our business, assessing, and managing our customers and business needs or for one or more of our functions or activities.

When you enquire about our services or when you become a customer of BK Civil Group, a record is made which includes your personal information. The types of information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, and may likely include:

Contact Information & Personal Data: your name, date of birth, age, gender, address, email address, telephone details and tax file numbers.

Sensitive Information: In limited circumstances, BK Civil Group may collect information which is considered sensitive information. For example, if you are injured at an event promoted or delivered by BK Civil Group, we may collect health information about you in an emergency or otherwise with your consent.

Credit information: credit information such as details relating to credit history, credit capacity, and eligibility for credit. We might collect information about you from and give it to credit reporting bodies. Each credit reporting body has a credit reporting policy about how they handle your information. Please contact us if you would like to confirm the credit reporting bodies, we use.

Payment Details: your credit card, bank account details, and billing information to complete purchases.

Financial Details: financial details relating to you or your business, which may include budget information, wages/salary information, and liabilities and assets.

Identification Documents: your driver's licence, passport, or other photographic identification documents.

Photographs & Videos: any pictures, videos, sound recordings and other audio-visual recordings that you provide to us or authorise us to take of you.

Employer & Profession: your professional details and information about your employer or an organisation who you represent.

Geo-Location & Locality Information: when you interact with us, then we may collect your current or last known location which is used in the determination of your locality from other individuals. We may achieve this through various methods, including collecting your Wi-fi, Guidance Positioning System (GPS), Cellular or other technology in your electronic device or web browser.

Cookies & Other Browser or Device Information: your session cookies and persistent cookies when you visit our website, your device type, browser type, Internet Protocol (IP) address, your URL information, the date and time (including time zone) of your visit, the pages you have accessed on our websites and third-party websites, your software and hardware information concerning your mobile device or computer. Cookies that we place may be removed by following instructions that are provided by your browser.

Employment Information: We collect personal information when recruiting personnel, such as your name, contact details, qualifications, and work history. Generally, we will collect this information directly from you. We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions (for example, positions which involve working with children).

Other Information: any other administrative and additional information that you provide to us, or authorise us to collect, as a part of your interaction with BK Civil Group.

BK Civil Group may collect personal information about other individuals who are not customers of BK Civil Group. This includes customers and members of the public who participate in events we are involved with, individual service providers and contractors to BK Civil Group, and other individuals who interact with us on a commercial basis. The kinds of personal information we collect will depend on the capacity in which you are dealing with BK Civil Group. Generally, it would include your name, contact

details, and information regarding our interactions and transactions with you. If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you.

We may collect personal information about children and minors (for example, when children participate in events we are involved with). Where those children and minors do not have sufficient maturity and understanding to make decisions about their personal information, we will require their parents or guardians to make decisions on their behalf. However, we are unable to distinguish the age or identity of the people accessing and using our website or social media platforms, or who attend events or activities run by us. This may result in the accidental collection of personal information from children and minors without the consent of a parent or guardian. If this does occur, then we recommend that you contact us and ask for the personal information to be de-identified or destroyed.

You can always decline to give BK Civil Group any personal information we request, but that may mean we cannot provide you with some or all the services you have requested. If you have any concerns about personal information we have requested, please let us know.

How and why do we collect and use your personal information?

We collect personal information from you in many ways and for different purposes. For example, we may collect your personal information through our website or mobile sites, when you visit our office, when you contact us or visit one of our social media sites (such as Facebook, Twitter, or Instagram).

BK Civil Group collects personal information reasonably necessary to carry out our business, to assess and manage our customers' needs, and provide our goods and services. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering contracts with you or third parties and managing customer relationships.

We may receive information about you that we have taken no active step to collect. If this occurs, then we may keep records of this information or choose to destroy or de-identify the information. The purposes for which BK Civil Group usually collects and uses personal information depends on the nature of your interaction with us, but may include:

- communicating with you and to confirm your identity.
- responding to requests for information and other general inquiries.
- administrative, management and operational purposes.
- processing any credit applications and performing credit history and reporting checks with third parties.
- informing you about our business offerings, news, updates, direct marketing material and event invitations.
- managing, planning, advertising, and administering programs, events, competitions, and performances.
- researching, developing, and expanding our facilities, products, and services.
- informing you of our activities, events, facilities, and services.
- recruitment processes (including for volunteers, internships, and work experience).
- responding to enquires and complaints.
- taking photographs, videos, or other audio-visual recordings of you for testimonial, marketing, or other promotional purposes.
- market research purposes and to innovate our delivery of products and services.

- through using surveillance and security cameras that capture your image.
 - processing your purchases, orders, transactions, or sales, including the processing of payments, arranging shipping, and providing you with tax invoices or order confirmations.
 - for data and marketing research and developing and improving our business offerings.
 - for any other purposes (including secondary purposes) that you would reasonably expect.
 - to enable us to comply with our obligations under the law.
- You can always decline to give us your personal information, but that may mean that we cannot provide you with some or all the goods and services you have requested.

BK Civil Group generally collects personal information directly from you. We may collect and update your personal information over the phone, by email, over the internet or social media, or in person. We may also collect personal information about you from other sources, for example:

- an authorised person acting on your behalf.
- our affiliated and related entities.
- third-party agents, suppliers and contractors who assist us to operate our business.
- recruitment service providers and any referees provided on employment applications.
- payment and debit service providers processing and managing the transaction on our behalf.
- your family and friends through any marketing or promotional activity that we conduct.

How do we disclose your personal information?

During the conduct of our business, we may use and disclose your personal information in a variety of circumstances, including to the following parties:

- our affiliated and related entities
- our engaged contractors, agents, suppliers who assist us to operate our business.
- commercial partners under an agreed information sharing arrangement.
- credit reporting bodies and credit related service providers
- payment and debit service providers and processors, including debt recovering or collection service providers.
- our marketing research service providers and digital marketing agents
- third party website service providers and website plugin or widget service providers
- our professional advisors, such as our lawyers, accountants, and financial advisors
- relevant courts, tribunals or regulatory authorities and law enforcement bodies
- anyone else to whom you authorise us to disclose your information, or that would be reasonably expected; and
- other companies or individuals as necessary to enable us to provide you with our goods and services.

BK Civil Group take reasonable steps to ensure that the third parties we engage take reasonable steps to protect your personal information following the APPs and in a similar manner with this Privacy Policy. Our third-party service providers are required only to use the personal information disclosed to them by us for the purpose that it was provided to them. Additionally, the third parties who we have disclosed your personal information to may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

BK Civil Group may also use Google Analytics to help us understand how our customers and clients use our platforms, products, and services. You can read more about how Google uses your Personal Information via <https://www.google.com/intl/en/policies/privacy/>. You may also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

How do we disclose personal information to overseas recipients?

Your personal information may be transferred to recipients located in countries that have data protection laws which protect personal information in a way which is at least substantially similar to the APPs. Accordingly, there may be mechanisms available to you to enforce protection of your personal information under that overseas law. In the circumstances, we do not require the overseas recipients to comply with the APPs, and we will not be liable for a breach of the APPs if your personal information is mishandled. We also disclaim responsibility to the extent permitted by law and note that you may not have a remedy under Australian law.

Do we use or disclose your personal information for direct marketing?

BK Civil Group may use or disclose your personal information to inform you about our services, upcoming promotions and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below. If you opt-out of receiving marketing material from us, then we may still contact you concerning our ongoing relationship with you.

How do we hold, store, and secure your personal information?

BK Civil Group takes reasonable steps to protect your personal information from misuse, interference, and loss and from unauthorised access, modification, or disclosure. For example, we may maintain computer and network security, use firewalls and other security methods and other security systems such as user identifiers and passwords to control access to our computer systems.

Please be aware that there is no method of transmission of information over the internet or through electronic storage that is fully secure and safe. We cannot guarantee the security of your personal information that we hold, but we do take reasonable steps to protect your information. If we are required by law to inform you of any misuse, interference, loss or unauthorised of your personal information, then we will notify you electronically, in writing or by telephone.

Our websites, applications or email systems may not use encryption or other technologies to ensure the secure transmission and receipt of information via the internet. Anyone using our website or receiving an email from us is encouraged to exercise care in sending personal information or depositing money via the internet. We recommend that you refrain from clicking any unsecure links or opening unknown attachments.

If you hold any concerns or become suspicious of any misuse, interference, loss or unauthorised access to our website, our email systems or to our business more generally, we ask that you contact us immediately to verify your concern or suspicion.

BK Civil Group hold and store your personal information in paper-based files, other electronic record keeping methods in secure databases (including trusted third-party storage providers based in

Australia and overseas), which may include cloud-based storage providers.

Paper-based Storage: Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference, and loss and from unauthorised access, modification, or disclosure.

Electronic Storage: Your personal information is generally usually collected in electronic form for use or storage with the third-party storage provider that we engage.

Third-Party Storage: Your personal information is generally usually collected in electronic form for use or storage with the third-party storage provider that we engage.

We cannot ensure that your Personal Information is or will remain secure. This is due to us not having control over the third-party provider's policies and procedures concerning the handling and storage of your Personal Information. We take reasonable steps to ensure that the third parties we engage take reasonable steps to protect your personal information in accordance with the APPs and a similar manner with this Privacy Policy.

What are the choices that you can make about your personal information?

At any time, you can request that we:

- delete or destroy your personal information, or
- de-identify your personal information, or
- access or correct your personal information, or
- provide you with a copy of your personal information.

Please understand that we may not be able to entertain your request if it is unlawful to do so or is otherwise impractical or unreasonable to do so in our discretion.

Delete or destroy your personal information

Until you request for it to be deleted or destroyed, your personal information is kept by us for as long as necessary to provide our goods and services to you and for legitimate and essential business purposes, such as complying with our legal obligations or settling disputes. This means that your personal information can be held for some time. Please note that we do take steps to destroy or de-identify information that we no longer require.

Remaining Anonymous & De-Identification

BK Civil Group may require you to provide specific details and information to enable us to provide our goods and services to you. We try to provide everyone with the opportunity of staying anonymous or using a pseudonym in their dealings with us where it is lawful and practicable to do so. For example, when making a general and nonspecific enquiry. Typically, it is not possible for us to deal with you anonymously or pseudonymously on an ongoing basis. If we do not collect your personal information, you may not be able to utilise our goods and services, deal with us or participate in our events, programs, or activities we manage or deliver.

Accessing or correcting your personal information?

You are entitled to access or request a copy of your personal information held by us by sending us a request. You will not be charged for making a request to access or copy your personal information, but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

You are responsible for ensuring that your personal information with us is accurate and updated regularly. 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, inaccuracies, or discrepancies in the information we hold about you and letting us know if your details change.

On occasions, we may decline your request to access or correct your personal information in accordance with the APPs. 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.

Does the European Union General Data Protection Regulation apply to us?

The European Union (the **EU**) General Data Protection Regulation (commonly referred to as **GDPR**) contains new data protection requirements is effective as of 25 May 2018. GDPR replaces national privacy and security laws that previously existed within the EU with a single, comprehensive EU-wide law that governs the use, sharing, transferring, and processing of any personal data that originates from the EU. The GDPR applies to the data processing activities of businesses, regardless of size, that are data processors or controllers with an establishment in the EU.

Consequently, Australian businesses of any shape and size may need to comply if they have an establishment in the EU, if they offer goods and services in the EU, or if they monitor the behaviour of individuals in the EU. There are also some notable differences, including certain rights of individuals (such as the 'right to be forgotten') which do not have an equivalent right under the APPs and the Privacy Act.

In some circumstances, **the GDPR provides** additional protection to individuals located in Europe. Where this is the case, there may be additional rights and remedies available to you under the GDPR if your personal information is handled in a manner inconsistent with that law. However, the fact that you may be located in Europe does not, on its own, entitle you to protection under the GDPR. Our website does not explicitly target customers located in the European Union, and we do not monitor the behaviour of individuals in the European Union, and accordingly, BK Civil Group does not currently believe that the GDPR applies.

What should you do if you have a complaint about the handling of your personal information?

You may contact us at any time if you have any questions or concerns about this Privacy Policy or about how your Personal Information has been handled. You may make a complaint to the Privacy Officer using the contact details set out below.

Complaint handling process

Our 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 contact you within thirty (30) days of the date we receive the written details of your complaint to acknowledge that we have received it. We may ask you to provide further information about your complaint and the outcome you are seeking.

Our Privacy Officer will review the way we dealt with your Personal Information, conduct an internal investigation (if necessary) into the complaint and will likely respond to you within thirty (30) days of the date we acknowledged receipt of your complaint. 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 sixty (60) days of receipt of the complaint. If the matter is more complex or our investigation takes longer than anticipated, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that BK Civil Group may have breached the APPs or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner (**OAIC**). The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website www.oaic.gov.au.

How are changes made to this Privacy Policy?

We may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes. If there are any material changes to our Privacy Policy, then we will take reasonable steps to notify you by email to your last known email address.

Our contact information

We welcome any comments or questions about our Privacy Policy. All enquiries should be directed to BK Civil Group's Privacy Officer at the following contact details:

Attention: Privacy Officer

Postal Address: BK Civil Group, PO Box 7562, Toowoomba South Qld, 4350

Email: incident@bkcivil.com.au

This Privacy Policy was last updated on 7 March 2021.