

YOUR PRIVACY IS IMPORTANT TO US

Jordi Construct Pty Ltd ('Jordi', 'we' or 'us') recognises that the privacy of personal information about individuals is important to our clients, contractors and employees. This policy describes how we collect and protect individuals' personal information and deal with it in accordance with Australian Privacy legislation.

WHAT IS PERSONAL INFORMATION?

Personal information means information or an opinion (whether or not true, and whether or not recorded) about an identified individual, or about an individual who is reasonably identifiable. Contact details are 'personal information'.

Personal information that relates to an individual's own characteristics or their beliefs or affiliations is known as '**sensitive information**' and will only be collected by us or on our behalf with an individual's consent or when required by law (which may include for work, health and safety purposes). This can include information relating to ethnic origin, political opinions, religion, professional associations or memberships, health, medical and biometric information and any criminal record.

WHAT LEGISLATION APPLIES?

The Commonwealth Privacy Act 1988 and related Regulations control the way in which relevant organisations may collect, use or disclose an individual's personal information in accordance with the Act's Australian Privacy Principles.

WHY AND WHEN WE COLLECT PERSONAL INFORMATION

We collect personal information from individuals only where this is a necessary part of our business activities. Our main business activity is the management of construction projects. We may receive personal information about individuals in the following ways:

From contractors, their workers and our employees: -

- when contractors are tendering for, or communicating about, jobs or projects,
- when workers and our own employees are inducted on to worksites that we manage. This involves personal and medical information from inductees (see further below) being uploaded to a document management system shared with us by Hammer Technologies Pty Ltd (HammerTech). HammerTech has its own privacy policy at: <https://www.hammertech.com/en-au/privacy-policy/anz>,
- when events relating to work health and safety occur on sites that we manage (including medical information relating to injuries on site and subsequent treatment or relating to random drug or alcohol testing).

From or about potential employees: when individuals apply for jobs, in addition to their contact details and other kinds of personal information described below, we check their qualifications and work history, character information, previous employers and personal referees. We receive communications about individuals from recruitment consultants. If the individuals are employed, we will keep these kinds of information about them for our internal employee records. If individuals agree, we may keep some of this information even if we do not employ them so as to contact them in the future if a suitable job opportunity arises.

From viewers of our website: we, our third-party website operators, and HammerTech may collect personal information in the form of a viewer's IP address or domain name. We use cookies (text files placed in your computer's browser) to monitor usage of our website and to create a record of when individuals visit our website and what pages they view so that we may provide a more efficient web service. Cookies do not identify a viewer personally, but they may link back to a database record about that viewer. That is, once you choose to furnish us or HammerTech with information that identifies you, the information can be linked with data stored in the cookies. Most web browsers are set up to accept cookies. Viewers can re-set their browser to refuse all cookies or to receive a warning message with each cookie which viewers can then refuse by turning it off in their browser. The relevant internet service provider should be able to assist a viewer to set their preferences. We and HammerTech may also use web beacons on our websites. Web beacons or clear gifs are small pieces of code placed on a web page to monitor viewers' behaviour and

collect data about people viewing a web page. For example, web beacons can be used to count the users who visit a web page or deliver a cookie to the browser of a person viewing that page.

Our website may contain links to other websites for viewers to access. Viewers should be aware that the privacy policies of the operators of those other sites may not be the same as ours and viewers should refer to the privacy policies of those other sites.

For persons who contact us by email: we may collect their email address, name and (if shown in the email) the name and address of their employer.

For workers at, and visitors to, our sites: we may use CCTV or other recording methods to maintain safety and security at our sites. We use CCTV recordings to identify individuals for security, risk management, loss prevention and incident investigation. Recordings may be provided to clients, law enforcement bodies and insurers. If someone is involved in an incident, we may ask for medical information and other information about them from third parties.

WHAT INFORMATION IS COLLECTED

We may ask individuals for the following information, depending on our relationship with them or their employer. The following includes information required in the HammerTech induction checklist:

- Job title and employer's name
- Photo ID, name, gender, phone numbers, postal and residential addresses and email address, date of birth
- Vaccination status, details of existing medical conditions, allergies, pre-existing injuries, prescription medication, injury data (generally, sensitive information)
- Military veteran status
- Whether the individual has Australian citizenship or relevant visa information
- Whether of Torres Strait Island or Indigenous descent
- Emergency contact information (name and contact number of person nominated as next of kin or other emergency contact person)
- bank account and superannuation fund details
- car registration
- professional experience and qualifications including details of permits to work, certificates of currency, and other licences relating to construction membership of professional organisations and former employer or referee contact details
- For injury claimants, information about the nature of the injury and related medical information (sensitive information)
- Results of random alcohol or breath tests on site (sensitive information)
- Plant and equipment details
- Information about access and use of physical sites ('site diary information')
- Information about access to, and use of, our website
- Information about access and use of HammerTech's website, platform and applications by us and by individuals inducted on sites that we manage.

Where clients are corporations, they may provide us with personal information about their directors or different contact persons within that corporation including name, job title, and contact information.

Where a consultant or subcontractor is a corporation, we may also collect additional information about their directors, managers, or contact persons which could include names, job titles, business and personal addresses and phone numbers, as well as additional information such as ABN, professional and/or public liability insurance details.

CONSEQUENCES OF NOT PROVIDING PERSONAL INFORMATION

If an individual does not wish to provide us with the personal information that we need, we might not be able to contract with them or provide the services they wish to receive.

USE AND DISCLOSURE OF PERSONAL INFORMATION

We will not make personal information about an individual that we have collected for business purposes available to anyone (other than our third-party service providers), except as agreed by that individual, or as required or permitted by law.

Where we use third - party service providers, these service providers may have access to an individual's personal information to perform contractually specified services - for example, the operation of our website. We contractually require that all personal information obtained or accessed from us by such providers be kept confidential and in accordance with the Australian Privacy Principles.

CURRENT AND FORMER EMPLOYEES

Employee records are exempt from the Australian Privacy Principles and the Commonwealth Privacy Act. However, employees may have a right of access to certain employment records under State or Federal employment legislation. We are committed to keeping employment information confidential and secure.

HOW INFORMATION IS COLLECTED

Information about on-site workers, including our own employees, is collected on our behalf by HammerTech during registration and induction. That information is kept on their platform and shared with us.

We will collect personal information directly from the relevant individual, unless it is unreasonable or impracticable to do so (for example, in checking resume information) or unless it is appropriate for us to obtain independent checks of the information (for example, that a job applicant does not have a criminal record).

Methods of collection of personal information include: from emails and letters sent to us, including resumes; information that contractors give us as part of the tendering process; face to face meetings; interviews; business cards; telephone conversations; data bases, from your use of our website or the HammerTech platform/ application.

We may also receive personal information (which may be sensitive information) from individuals in job interviews or telephone conversations and from job referees or from our own research, including to verify citizenship, visa details, qualifications, references and other information that individuals give us.

WHERE A THIRD PARTY GIVES US INFORMATION

Should a third party give us unsolicited personal information about an individual, we will within a reasonable period determine whether or not we could have collected the information directly and, if not, we will take reasonable steps to destroy or de-identify that information unless the law otherwise requires.

Individuals have the right to ask us to let them know the source of the personal information we hold about them. So long as a response is not impracticable or unreasonable, we will reply to all queries within a reasonable period without cost to the individual.

COLLECTION NOTICES

When we collect personal information from an individual, or obtain personal information about them from other sources, we will give the individual a “collection notice” which means that we will make them aware of the required information referred to in Australian Privacy Policy 5.2.

CONTACTING INDIVIDUALS

When we contact individuals electronically, we will comply with the Spam Act 2003 (that is, send communications only with the express consent of the recipient, or consent inferred from an existing relationship, which identifies the sender, and which includes an ‘unsubscribe’ mechanism). If an individual does not want to receive marketing messages, they may ask us not to send any direct marketing by following the unsubscribe instructions on our communications or by contacting us using the details set out in the communication and we will comply as soon as reasonably practicable.

CONSENT

By applying for a position with us, or being a director or other relevant individual in relation to a company contracting with us, an individual consents to our collection, use and disclosure of any personal information and any related information in the manner described in this Privacy Policy and in particular consents to us contacting third parties to check information (including personal and sensitive information) given to us about individuals in a resume or contract tender and, where permitted by law, to us collecting information about such individuals without their knowledge or consent.

OVERSEAS INDIVIDUALS

Customers located overseas may have additional privacy rights that apply under local law, such as the European Union General Data Protection Regulation.

OVERSEAS RECIPIENTS

We are not likely to disclose personal information directly to overseas recipients, but to the extent that personal information kept by us or any third-party provider is backed up using services located in the cloud (which could be overseas servers) or servers not located in Australia, back-ups of that information could be held overseas. We are not aware of the countries in which relevant servers are likely to be located.

SECURITY AND QUALITY OF PERSONAL INFORMATION

We will take all reasonable steps to ensure that any personal information about individuals which we hold is:

- (a) secure: protected from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- (b) appropriate: accurate, complete, up to date, relevant and not misleading having regard to the purpose for which it is held.

While we take reasonable steps to protect all the personal information in our possession that we have collected through our website, we cannot guarantee the security of all data submitted to us over the internet.

Personal information may be kept and be accessible in both hard and soft copy at our Australian offices.

We operate secure data networks protected by industry standard firewall with password protected systems. Our security and privacy policies are periodically reviewed and enhanced as necessary.

We restrict access to personal information to our employees and contracted third party providers who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined or their contract terminated if they fail to meet these obligations.

Our access to personal information is limited to the following departments for their respective purposes: Finance, IT, Property Management, and Compliance (including the Privacy Officer).

HammerTech, which collects personal information from on-site workers (including our employees) on our behalf, including sensitive medical information, states that it maintains firewalls, anti-virus, network segmentation and other reasonable mechanisms to secure worker personal information.

DISPOSAL OF PERSONAL INFORMATION

We will take reasonable steps to destroy or de-identify personal information if we no longer need it for any authorised purpose and are not required by law to retain it. Some information may need to be retained for contractual or corporate governance purposes.

ACCESS TO PERSONAL INFORMATION

We will handle all requests for access in accordance with the Australian Privacy Principles. In most cases, we will give an individual access to any personal information that we hold about them within a reasonable period (noting that Australian Privacy Principle 13.5 requires an access request to be dealt with within 30 days) and in the manner requested, if that is reasonable. In some cases, we may refuse access where refusal is required or permitted by law.

Subject to the law, we may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, information that is only available on older back-ups, or would involve developing a new system or significantly changing an existing practice), or which risk the privacy of others. We will provide the individual with reasons for any refusal. We may charge a reasonable fee for giving an individual access to their personal information.

Requests should be sent to our Privacy Officer at the address below.

CORRECTION OF PERSONAL INFORMATION

We appreciate assistance to keep any personal information held by us up to date, complete and accurate. If an individual wants to update any personal information about them that we hold, they should contact our Privacy Officer.

We will, on request, normally amend any personal information which is inaccurate, incomplete, out of date, irrelevant or misleading (without cost) where:

- (c) we have requested the individual to provide us with the updated information;
- (d) we are satisfied that the information needs to be corrected; and/or
- (e) we agree with the request that the information be corrected.

If we disagree with the request, we will respond with our concerns about the change requested, giving reasons for our refusal and describing available complaint mechanisms. If requested, we will then (at no cost and within a reasonable period) take reasonable steps to add to our records a statement of the claim that the information in question is inaccurate, incomplete or out of date (whichever is relevant) and details of the particular change requested.

DO WE USE AI?

In providing our services, we do not use any artificial intelligence (AI) decision-making or services. We will not give personal information to any platform, system or application based on, or which makes significant use of, AI - even if that information is anonymised.

DATA BREACH OBLIGATIONS

We maintain systems to respond to internal or external data breaches in accordance with the guides and resources at:

<https://www.oaic.gov.au/agencies-and-organisations/guides/data-breach-preparation-and-response>

A breach will need to be reported to the regulator and to persons involved when:

- there is unauthorized access to, or disclosure of, personal information held by us, or where personal information is lost in a situation where unauthorized access or disclosure is likely to occur, and
- there is a risk of serious harm to the individuals to whom the information relates (for example, access to their bank details, identity theft or reputational harm), and
- we have not been able to prevent the likely risk of serious harm to the individuals to whom the information relates by remedial action.

COMPLAINTS PROCESS

We cannot deal with complaints made anonymously or by pseudonym. Complaints about how we handle personal information should be made to our Privacy Officer.

Jordi Construct Privacy Officer

Jordi Construct Pty Ltd
Unit A1, 35-39 Bourke Road
Alexandria NSW 2015

telephone: + 61 (0) 477 046 313

email: ccraven@jordiconstruct.com

The Privacy Officer will acknowledge the complaint within three business days of receipt and will seek to resolve the complaint within 30 days of receipt as per Australian Privacy Principle 13.5.

COPIES OF THIS POLICY AND FURTHER INFORMATION

This policy is available on our website and hard copy will be provided on request to our Privacy Officer. If you require more information about the way that we handle your personal information, contact our Privacy Officer.

CHANGES TO THE PRIVACY POLICY

As the Federal Government introduces new privacy legislation, this Policy will be reviewed and updated accordingly. We will also regularly review this Policy and may change it from time to time. The date at which this Policy was most recently updated is given below.

INTERPRETATION

Should there be any inconsistency between this Privacy Policy and applicable privacy legislation, this Privacy Policy shall be interpreted to give effect to, and comply with, such legislation.

FURTHER INFORMATION

More information on privacy legislation and guidance material is available from the Office of the Australian Information Commissioner:

GPO Box 5218

Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Facsimile: +61 2 9284 9666

<http://www.oaic.gov.au>



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Director



Greg Malenstein

Director

20/02/2025