



UCS GROUP

PRIVACY POLICY

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| Approved By: Stephen Ellich – Managing Director & CEO | Review Date: 28/6/2024 Review No. 1 |
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1. INTRODUCTION

The purpose of the Privacy Policy is to outline UCS Group’s obligations for and commitment to the responsible management of personal information held about employees and individuals with whom it interacts. This policy applies to all collection, use, disclosure, storage and destruction of personal information by UCS Group. This Policy applies to all employees, contractors, visitors and suppliers.

UCS Group is committed to the responsible management of Personal Information. This commitment arises not only from a wish to comply with its legal obligations but also in recognition of and commitment to information privacy.

2. POLICY DEFINITIONS

The following are the Policy definitions:

- **Contractor:** a company or an individual engaged to provide services to UCS Group. Contractors include consultants.
- **Collection:** includes any means by which UCS Group obtains Personal Information including information that is volunteered, incidentally obtained or gathered from another organisation.
- **Privacy Statement:** a statement by UCS Group when collecting, using, disclosing and otherwise managing Personal Information collected in the course of its activities, which is provided at or near the time such information is collected.
- **Personal Information:** as defined in the Privacy Act 1988 (Cth) is information or an opinion (including information or an opinion forming part of a database), that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.
- **Privacy complaint:** a complaint by an individual about an act or practice of UCS Group in relation to the individual's Personal Information which the individual believes is contrary to or inconsistent with the *Information Privacy Principles* set out in the *Privacy Act 1988 (Cth)* or the *Health Privacy Principles set out in the Health Records Act 2001 (Vic)*.
- **Employee:** any person employed by UCS Group.

3. PRIVACY OFFICER

UCS Group will appoint a Privacy Officer to:

- Provide advice and training on issues related to information privacy
- Develop information privacy resources in the company
- Liaise with the Office of the Australian Information Commissioner
- Receive enquiries about privacy at UCS Group
- Receive and co-ordinate the investigation of privacy complaints

UCS Group’s Privacy Officer and contact details are below:

- Grant Whyte – General Manager – People, Culture & Safety
- gwhyte@ucs.com.au
- 29 Efficient Drive, Truganina VIC 3029

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4. COLLECTION OF INFORMATION

Personal information must only be collected where necessary and relevant to UCS Group functions and activities and where there is a specific and immediate need to do so in a lawful and fair manner. When collecting Personal Information directly from an individual, whether by verbal, written or electronic means, UCS Group will take all reasonable steps to ensure that the individual providing such information is made aware of how their information will be used and with whom it might be shared or communicated.

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you.

We may collect the personal information you directly give us through some of the following means:

- when you make an inquiry or order in relation to goods or services, including through our website located at www.ucs.com.au (the Website);
- when you enter into contracts with us for our goods or services;
- from correspondence (whether in writing or electronically) or when you contact us via telephone, social media platforms or other means;
- if you attend any of our premises, we may record certain contact details so that we can comply with applicable laws, and we may also record your image and/or voice if we have surveillance systems operating at those premises;
- as otherwise required to manage our business.

However, in certain cases we may collect personal information from publicly available sources (for example, websites) and third parties, such as suppliers, recruitment agencies, your employers, contractors, our clients and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information. Types of personal information we may collect

The types of personal information we collect about you depends on the circumstances in which the information is collected. Typically, the types of personal information we collect include (but is not limited to) your name, address, email address and phone numbers.

If we enter into contracts with you, request or receive goods or services from us or have any other commercial dealings with us, we may also collect your signature, date of birth, credit card and /or banking details, and billing information.

If you are an individual contractor to us or apply for a role with us, we may also collect information relevant to your engagement with us including qualifications, length of engagement, resume, current and former employment details, pay rate and salary, bank details, feedback from supervisors, training records and logs of your usage of our equipment (e.g. phones, computers and vehicles).

If you attend a premises we operate or manage, we may:

- collect certain contact details that you provide to us (which may be via digital check-in apps), including the date and time of attendance, including so that we can comply with applicable laws (such as public health directives). If we collect such information to comply with a particular law, we will only use and disclose it in accordance with applicable laws; and

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UCS Group - Privacy Policy

- record your image and/or voice through the use of Closed-Circuit Television (CCTV) systems footage of you via our CCTV devices, for the purposes of managing security of the premises and health and safety of occupants and the public generally.

If you access our website or mobile apps, we may utilise cookies to collect additional information about your use of our website and apps. If when you are on our website or our apps and you have provided us with permission to access your device location, we may collect information about your geographical location. If we communicate with you by email, we may use technology to identify you so that it will be in position to know when you have opened the email or clicked on a link in the email.

In addition to the types of personal information identified above, we may collect personal information as otherwise permitted or required by law.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services and/or certain functionality of our Website.

5. OUR PURPOSE FOR HANDLING YOUR PERSONAL INFORMATION

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances. The purposes for which we use and disclose your personal information will depend on the circumstances in which we collect it. Whenever practical we endeavour to inform you why we are collecting your personal information, how we intend to use that information and to whom we intend to disclose it at the time we collect your personal information.

We may use or disclose your personal information:

- for the purposes for which we collected it (and related purposes which would be reasonably expected by you);
- for other purposes to which you have consented; and
- as otherwise authorised or required by law.

In general we collect, use and disclose your personal information so that we can do business together and for purposes connected with our business operations.

Some of the specific purposes for which we collect, hold, use and disclose personal information are as follows:

- to provide you with our goods and services;
- to receive products or services from you;
- to consider you for a job (whether as an employee or contractor) or other relationships with us;
- to provide you with tax invoices for our goods and services;
- to comply with our legal and regulatory obligations;
- to protect the security, health and safety of our premises, facilities, personnel and visitors;
- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

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6. USE AND DISCLOSURE OF INFORMATION

UCS Group will use Personal Information it collects in the course of its activities only for the primary purpose of collection or where authorised by law. UCS Group employees can only access Personal Information to the extent necessary to perform their job. UCS Group employees must seek advice from the Privacy Officer prior to any use or disclosure which is not for the primary purpose of collection or a use which would be reasonably anticipated by the individual.

Disclosure of any personal information outside of the company is strictly limited required third parties such as:

- Suppliers, contractors or other organisations who provide technical or support services to UCS group;
- Our related entities, which are also bound by this policy;
- Professional advisors such as accountants, legal advisors, insurers, auditors and other professionals are required from time to time;
- Authorised third parties whom you have approved to be provided with personal details, such as referees (work, finance or real estate related);
- Debt collection agencies;
- Authorised Government agencies as directed by broad or specific legislation.

Should your information be shared to any of the above parties they too would be bound by confidentiality and privacy legislation.

Should there be a breach of your privacy through a third party cyber attack or the like, you will be informed as per the requirements of the Privacy Act. UCS group will self report, as required by the legislation, then inform affected parties as to the nature and timeframe of the breach.

7. SECURITY AND DISPOSAL

UCS Group will ensure that Personal Information is kept secure and protected from misuse, loss, unauthorised access, modification or disclosure and destroyed or permanently de-identified when it is no longer needed by UCS Group subject to obligations under the Commonwealth Privacy Act, Fair Work Act, the various state based Workers Compensation Acts, Taxation Acts and other relevant legislation.

Electronically held information will be erased as and when required by the above legislation. Hard copies of information, should they exist, will be destroyed through the use of confidential destruction methods.

8. ACCESS AND CORRECTION

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access (which we will only do in accordance with applicable laws), we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to the personal information we hold about you.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

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We will respond to all requests for access to or correction of personal information within a reasonable time.

9. COMPLAINTS PROCESS

If you have any questions, concerns or complaints about our Privacy Policy or how we handle your personal information please contact our Privacy Officer.

We take all complaints seriously and will respond in a timely manner in line with legislated requirements.

Should you be dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner
GPO Box 5218, Sydney 2001
enquiries@oaic.gov.au

10. CONSULTATION

All UCS Group staff must be made aware of this policy and have access through the UCS Group intranet and UCS Group business management system.

11. POLICY APPROVAL

The Policy is subject to review by the Executive Management Team as required by the UCS Group business management system. Any amendments to the Policy must be approved by the Chief Executive Officer. The Privacy Officer is responsible for administering the Privacy Policy.

12. BREACH OF POLICY

Any breach relating to this policy is to be reported to the Privacy Officer. The Privacy Officer will then take appropriate action based upon the size and nature of the breach, in line with the Privacy Act requirements, including relevant reporting to the OAIC should it be required.

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