



PRIVACY POLICY

1 INTRODUCTION

RCR Tomlinson Limited and its subsidiaries (“RCR”, “we”, “us”), are committed to protecting the privacy of individuals and are bound by the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (“**Privacy Act**”). There may be occasions when RCR requires your personal information and this Privacy Policy (“**the Policy**”) has been created to ensure that this information is protected and secure. RCR values your privacy and believes you should know how we handle your information and how you may access it.

This Policy applies to the collection, use, disclosure and handling of personal information by RCR. RCR will only collect, use or disclose personal information in accordance with the Privacy Act and this Policy.

In this Policy, “**personal information**” has the meaning as defined in the Privacy Act. It includes your name and contact details.

2 YOUR ACCEPTANCE OF THIS POLICY

By providing your personal information to RCR, using our website and the services available on our website, including submitting an employment application to RCR, you consent to us collecting, using, storing, disclosing and dealing with your personal information as set out in this Policy.

If you do not agree to the terms of this Policy, please contact us immediately by emailing privacy@rcrtom.com.au and refrain from using our website and providing us with any personal information.

3 TYPES OF INFORMATION COLLECTED BY RCR

You may provide RCR with personal information while working with us, or you may ask us to provide you with information, goods, products or services, and by doing so, supply personal information. The information we collect about you depends on the circumstances.

In general, we may collect the following types of information:

- name and contact details (including your postal address, geographical address, email address, phone numbers);
- date of birth, age and other demographic information;
- occupation;
- Internet Protocol address;
- customer history or preferences in relation to our products or services;
- if you are a prospective employee:
 - employment history, experience and details of your performance;
 - education, qualifications and skills;
 - professional memberships, hobbies and affiliations;
 - details of referees and personal references; and
 - pre-employment medical results including drug and alcohol testing;



- travel requirements; and
- answers you provide to questions we ask which assist us to conduct our business, including to determine whether you are suitable for potential employment opportunities.

Wherever practicable, RCR will allow you to provide personal information anonymously or with a pseudonym.

4 COLLECTION OF YOUR PERSONAL INFORMATION

RCR collects personal information from you in a number of different ways, including:

- directly from you, for example when you provide personal information to us, our agents or our contractors in person, by email, over the phone or through your use of our website;
- by your use of our website;
- from publicly available sources of information;
- if you consent, from third parties (if appropriate), including from referees that you provide to us and other persons where we may be required to confirm information you have provided to us; and
- if you consent, by way of background checks (including from law enforcement agencies).

Indirect methods of collecting personal information include obtaining pre-employment medical results and reference checks for prospective employees.

The purposes for which RCR collects your personal information will vary depending on your relationship with RCR and may include:

- contacting you;
- responding to your queries;
- providing you with information in relation to our products and services;
- for prospective employees, assessing your application for employment with RCR; and
- developing and improving our services and obtaining feedback.

5 PASSIVE COLLECTION OF PERSONAL INFORMATION THROUGH OUR WEBSITE

If you are a user of RCR's website, we may collect certain information from you passively, including your IP address, details of your computer system, browser details, details of the website from which you linked to our website, geographical location information, pages visited, duration of visit and website functionality accessed. However, this information does not identify you as an individual and only identifies details about the computer that you are using to view the site and your approximate geographical location.

RCR may use and combine such passively collected information to improve our website, customise it based on your preferences, compile and analyse statistics and trends and otherwise administer and improve our website.

RCR may also disclose this de-identified information to third parties.



6 USE OF YOUR PERSONAL INFORMATION

RCR collects, holds, uses and discloses personal information where necessary for our business activities, including facilitating sales, staffing at projects, dealing with customers and suppliers, handling enquiries and to provide and improve our services and products.

RCR may hold, use or disclose your personal information for the primary purpose for which it was collected. RCR may also hold, use or disclose your personal information for any secondary purpose that is related to a purpose for which we collected it, where an individual would reasonably expect it to be held, used or disclosed for that purpose, in accordance with the Privacy Act.

RCR may also hold, use or disclose your personal information where you have expressly or impliedly consented to the holding, use or disclosure or, where the holding, use or disclosure is authorised or required by law. If RCR wishes to hold, use or disclose the personal information in other circumstances, we will obtain your prior consent to do so.

If you provide RCR with sensitive information such as your race or ethnic origin, political opinions, religious or philosophical beliefs, professional or trade union membership, sexual preferences, criminal record or your health for a purpose, including pre-employment checks, you consent to RCR holding and using this information for the purpose for which it was provided.

RCR will only collect personal information if it is reasonably necessary for RCR's business.

Use for employment applications and website feedback

RCR collects, holds, uses and discloses personal information for the following purposes:

- so that you can apply for employment;
- to assess your application for employment;
- to answer any of your queries or otherwise contact you regarding the information you have provided and your use of our website;
- to send you information regarding employment opportunities including any updates;
- to help us learn more about users of our website so that we can improve your experience and our business;
- to address any issues or problems with your use of our website or our business, products or services; and
- any other purpose disclosed to you at the time your personal information is collected.

RCR will not use any employment application information for any purpose other than to facilitate the recruitment process and will not use any employment application information for any marketing or other promotional or information gathering functions not directly related to the recruitment process. RCR will also not provide any employment application information to any other individual, company or government body or organisation except as required by law.

Optional uses you have consented to

At the time you provided your personal information or applied for a particular job vacancy, you may have been provided with a number of additional options regarding the use of your personal information. RCR will only use your personal information for optional uses if you have consented to such use by opt-in.

You may unsubscribe from these options at any time by contacting us.



7 DISCLOSURE OF YOUR PERSONAL INFORMATION

RCR will not disclose your personal information to any third parties except:

- to our related companies;
- to third parties appointed by RCR, including our contractors, website and data hosting providers, technology service providers, advertising partners and other persons who perform services for us – in which case, RCR uses reasonable steps to ensure such third parties keep your personal information confidential and do not use or disclose your personal information for any purpose other than the purpose of providing those services to us;
- where you have consented, to the extent required, in order to contact referees and other persons in order to confirm any information you have provided (e.g. your employment history and qualifications) and to perform background checks including with law enforcement agencies;
- where you have consented, to carefully selected third party partners so that they may inform you of offers, promotions, products and services;
- to our professional advisers, accountants, insurers, lawyers and auditors on a confidential basis;
- in the unlikely event that RCR or its assets are or may be acquired by a third party, the information may be provided to that third party and its advisors;
- in exceptional circumstances, RCR may be required or permitted by law to disclose personal information, for example to law enforcement agencies or to prevent a serious threat to public safety; or
- otherwise with your consent.

RCR requires third party organisations to which we disclose your personal information to acknowledge the confidentiality of this information, respect any individual's right to privacy and comply with the Australian Privacy Principles and this Policy. RCR also requires that these organisations use this information only for the purposes for which RCR collected the information (or a secondary related purpose) and otherwise follow our reasonable directions with respect to this information.

8 DISCLOSURE OF YOUR PERSONAL INFORMATION OVERSEAS

With operations in overseas territories (including New Zealand, Malaysia, Thailand and Vietnam), RCR may disclose your personal information to third parties located outside of Australia, if it is reasonably necessary for RCR's business. RCR may only disclose your personal information to third parties in a foreign country if such disclosure is permitted by the Australian Privacy Principles. This includes:

- if we are authorised to do so by law;
- when we use or disclose your personal information for any permitted purpose set out in this Policy; or
- if you have consented to us doing so.

RCR will, if and to the extent required by the Privacy Act, take reasonable steps to ensure that any overseas recipient complies with the Australian Privacy Principles in relation to your personal information, unless we have a reasonable belief that the overseas recipient is subject to a law or binding scheme which is at least substantially similar to the Australian Privacy Principles and that you have mechanisms to take action to enforce any misuse of your personal information in that location.



By providing RCR with personal information, you consent to RCR disclosing personal information to an overseas recipient.

9 HOLDING AND STORING YOUR PERSONAL INFORMATION

RCR places great importance on the security of all information of our clients, contractors and employment applicants. RCR has security measures in place to attempt to protect against the misuse, interference, loss and unauthorised access, modification or disclosure of personal information under our control.

Once RCR receives your personal information, it makes every effort to ensure its security on RCR's systems. Information stored within our computer systems can only be accessed by those entrusted with authority and computer network password sanctions.

10 PROTECTING YOUR PERSONAL INFORMATION

RCR understands that your information is personal and we respect your privacy. In consideration of this, RCR will take all reasonable steps to prevent your personal information from being misused, lost or otherwise accessed by unauthorised people.

No data transmission over the internet can be guaranteed to be 100% secure. Whilst we strive to protect users' personal information, RCR cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. You are responsible for keeping your passwords and/or account information secret.

Where RCR no longer requires your personal information RCR will destroy or permanently de-identify your personal information so that you can no longer be identified.

11 ACCESSING AND CORRECTING PERSONAL INFORMATION

You can request access to or apply to correct or update your personal information held by RCR by emailing privacy@rcrtom.com.au. RCR will comply with the Privacy Act when dealing with your request. There are certain exemptions which may apply to the provision of that information. Where permitted by the Privacy Act, we may also charge you a reasonable fee in order to provide you access to your personal information.

If you have any questions or concerns about RCR's collection, use or disclosure of personal information, or if you wish to make a complaint about a breach of the Privacy Act by RCR, please email RCR at privacy@rcrtom.com.au.

If you are not satisfied with the way we have handled your claim, or are not satisfied with the outcome, you may wish to speak to the Office of the Australian Privacy Commissioner. They can be contacted via email at enquiries@oaic.gov.au.

12 LINKED WEBSITES

Other websites that may be hyperlinked from the RCR website are not bound by this Policy and may have privacy policies that differ from RCR's. RCR does not share any personal information collected with those sites and is not responsible for any information, content or privacy practices of such websites. RCR recommends that you visit their website to review the terms of their privacy policy to determine if you are satisfied with their terms before using their website.



13 INVESTORS / SHAREHOLDERS OF RCR

RCR uses Computershare Investor Services Pty Ltd (“Computershare”) to maintain its share registry. Computershare maintains share information on behalf of RCR. You can get a copy of Computershare’s Privacy policy at www.computershare.com/au or by contacting Computershare at privacy@computershare.com.au.

14 AMENDMENTS TO THIS POLICY

RCR may make changes to this Policy from time to time without notice, by uploading an updated version of this Policy onto our website at www.rcrtom.com.au.

15 HOW TO CONTACT US

RCR is happy to answer any questions you may have about the privacy of your information. Please contact us at privacy@rcrtom.com.au or via post at PO Box C110, Perth Business Centre, WA 6849.