

Vac Group collects personal information as a result of numerous business activities that it undertakes. Vac Group will treat personal information including that of its employees, customers and business partners, in accordance with the Australian Privacy Act 1988 (Commonwealth) and related Privacy principles, the New Zealand Privacy Act 1993 and in accordance with applicable laws outside Australia and New Zealand.

This policy applies to Vac Group employees, third parties engaged by Vac Group, all alliances and joint ventures.

Personal information is any information (including an opinion) which can be used to identify an individual.

Sensitive information is a subset of personal information which includes information about an individual's race or ethnicity, political or religious beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences, criminal record and health information.

Personal information will not be shared, sold or disclosed other than in accordance with this Policy, without an individual's permission, or in accordance with the relevant privacy legislative requirements.

Vac Group only collects, holds, uses or discloses personal information where it is reasonably necessary to:

- Enable Vac Group to deliver services or information to individuals or to an organisation;
- Enable Vac Group to assist in the delivery of services;
- Maintain or establish business relationships, including as a customer, supplier, or contractor;
- Improve and better understand preferences with respect to delivery of services to clients; and
- Fulfil legal or regulatory obligations.

Situations in which Vac Group may collect personal information include:

- Recruitment and engagement of employees and contractors;
- When receiving services from third party suppliers, including subcontractors;
- When providing services to clients or customers;
- When dealing with certain government agencies;
- When visitors to Vac Group's website provide their personal information, such as name and email address;
- During safety and operational environment monitoring and surveillance; and
- When required by law.

Personal information will be stored in Vac Group's systems for immediate business and administration purposes, as detailed above and may be used or disclosed for the purpose for which it was collected, or for a related purpose which someone may reasonably expect. Sensitive information will only be disclosed for a purpose which is directly related to the purpose for which it was collected.

Personal information may be disclosed between related bodies corporate within Vac Group and used by those entities for the same purposes for which the collecting company is entitled to use it.

Vac Group may also disclose personal information to third party service providers and business associates, including joint venture and alliance partners, who provide services in connection with its business.

Vac Group is committed to:

- Safeguarding all personal information provided to Vac Group;
- Ensuring that personal information remains confidential, secure; and
- Taking all reasonable steps to ensure that personal privacy is respected.

Vac Group maintains physical, electronic and procedural safeguards to protect personal information from misuse, interference, unauthorised access, modification or disclosure and loss or corruption by computer viruses and other sources of harm. Access to personal information is restricted to those employees, joint venture partners, subsidiary companies and third parties who need to know such information.

In most circumstances, Vac Group will make available to an individual upon their request, any personal information held about them. Requests to access personal information may be made at any time. Vac Group will respond to a request within a reasonable time and in the manner requested, unless there is a legal or administrative reason preventing Vac Group from doing so. In some cases a reasonable fee may be charged for providing access.

Reasonable steps will be taken to ensure the personal information held is accurate, complete, up to date, relevant and not misleading before it is used or shared.

An individual may request that personal information be corrected or supplemented if the individual believes the information held by Vac Group is inaccurate or misleading. If Vac Group agrees, the change will be made. If Vac Group disagrees, Vac Group will advise the individual and include a notation on the record that the information's accuracy is disputed.

If personal information changes, or if an individual believes that the personal information held by Vac Group is no longer accurate or complete, the individual should contact the Human Resources Manager.

If unsolicited personal information is received, reasonable steps will be taken to destroy or de-identify that personal information.

Electronic media

Cookies are used:

- To determine the number and global location of visitors to Vac Group's website and to identify how visitors move around the site and, in particular, which pages they visit. This allows Vac Group's website and services to be improved; and
- To collect information, where available, about a computer or mobile device for system administration purposes, such as IP address, operating system and browser type.

Information collected through the use of cookies will only be used to evaluate Vac Group's website effectiveness and to improve user experience. Cookies are not used to identify an individual or to send targeted advertising.

Vac Group's website may include hyperlinks to websites owned and controlled by others. Vac Group is not responsible for the privacy practices of these websites. By accessing or using Vac Group's website, an individual consents to the collection, use and disclosure of personal information as described in this Policy, as amended from time to time.

If an individual has a question, concern or complaint regarding the way in which personal information is handled, or believes that Vac Group or one of its Operating Companies has breached its obligations under applicable Privacy Legislation, or has failed to comply with this Policy, they should raise their concern in writing to the Human Resources Manager.



Ben Costello

General Manager

24 January 2017