



company policies & guidelines

Privacy Policy

Alfasi Group Investments Pty Ltd and its related and associated entities (“**Afasi Group**”) provide a diverse range of services in the construction, engineering and property development industries, including structural steel fabrication, drafting services, equipment hire, project management, design and construction. The Alfasi Group includes our Alfasi Steel Constructions, Alfasi Design & Drafting, Alfasi Hire, Alfasi Property Development and Alfasi Asia businesses.

The Australian members of the Alfasi Group are bound by the *Privacy Act 1988 (Cth)* (“**Privacy Act**”) and the Australian Privacy Principles (“**APPs**”), upon which this policy is based.

Our Privacy Policy is designed to protect the confidentiality of information and the privacy of individuals by regulating the way personal information is collected, used, exchanged and managed, pursuant to and in accordance with the APPs.

Notably, each of our business units will apply our Privacy Policy to their particular individuals and contexts relevant to their daily business and operations.

1. Information we collect

Alfasi Group collects personal information about you in your interactions with us, for example when you request or use our services, work with us (at our offices or on project sites), communicate with us (by phone, facsimile or email communications) or visit our website.

When you use our website we may collect information about your location or activity including IP address, telephone number and whether you have accessed third party sites. Some of this website information we collect using cookies (for more information, please contact us).

We may monitor and record your communication with us and operate video and audio surveillance devices in our premises (including out project sites) for purposes including security, record-keeping and training.

In particular, the Alfasi Group collects personal information from the following individuals:

- Customers, actual or prospective;
- Suppliers;
- Sub-contractors;
- Persons involved with or authorised to deal with or on behalf of corporate customers or suppliers or sub-contractors;
- Employees;
- Applicants for employment with the Alfasi Group; and
- Other individuals who engage with the Alfasi Group in the ordinary course of business.

The types of personal information, including historical information, we collect include (but is not limited to) information about your identity and contact details, other personal details such as gender and date of birth, organisation information, trade and personal references, police records, and financial and banking information, including, if an individual, credit reports, bank statements or, if corporate, management accounts, including financial statements and reports for the company, bank statements or tax portal information.

Information from third parties

We may also collect information about you from others, such as service providers, employers, family members or government authorities and bodies. Further, we may be required from time to time to collect information about you that is publicly available, for example: public registers or social media or made available by third parties.

Sensitive Information

The Privacy Act also protects your sensitive information.

Sensitive information is information or an opinion about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs,

membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, genetics, biometrics or health.

If we need to obtain this type of information from you in our ordinary course of business, we will ask for your prior consent, except where otherwise permitted by law.

2. Use of Personal Information

Uses of Personal Information

We collect, use and exchange your information so that we can:

- verify your identity;
- assess applications and suitability for various products and services, including credit services, and, deal with your enquiries and concerns;
- administer our products and services to you and/or your organisation;
- process payments and refunds, including manage customer and/or supplier credit accounts;
- understand and manage our relationship with you and/or your organisation;
- manage our risks and help identify, detect, investigate and deal with unlawful or illegal activity or misconduct (whether actual or suspected), such as fraud or misrepresentation;
- conduct and improve our businesses and improve the customer experience, including help manage and enhance our products and services to your needs;
- comply with our legal obligations and assist government and law enforcement agencies or regulators;
- maintain and update our records and carry out other administrative tasks; and
- for such other reasons where permitted by law.

3. Disclosures and Exchanges of Personal Information

Internal Exchange of Information

We may exchange personal information with other members of the Alfasi Group, so that we may adopt an integrated approach to deal with our customers, suppliers and sub-contractors. Any member of the Alfasi Group may have access and use of this information for any purpose mentioned in Section 2 above.

We note that as a national organisation, personal information is freely transferred between States. However, we note that paper and electronic records of personal information are generally centralised for administration and management in Victoria, with some personal information stored interstate.

External Exchange of Information

We may exchange your personal information with third parties, for such purposes mentioned in Section 2 above or where otherwise permitted by law.

Third parties may include from time to time:

- service providers and specialist advisers who have been contracted to provide administrative, financial, research, auditing, accounting, customer and marketing, business and management consulting, banking, payment, delivery, data processing, data analysis, information broking, investigation, website, technology, database or other services, including those to whom we outsource certain functions;
- auditors, insurers, insurance investigators and insurance brokers;
- lawyers, courts, tribunals and government and law enforcement agencies or regulators, including the Australian Tax Office as require or authorised by law or in accordance with their reasonable information requests;
- credit reporting bodies and other credit providers;
- employers or former employers;
- persons involved in arrangements with the Alfasi Group or any of their individual businesses, including joint venture partners and partnerships;
- persons involved in arrangements that provide funding to the Alfasi Group or any of their individual businesses, including persons who may acquire rights to our assets (including accounts receivables), investors, advisers, trustees and rating agencies; and
- your representatives, agents or advisers and anyone else authorised by you or as specified by you from time to time or in accordance with your relevant contract.

We may also need to provide your personal information such as qualifications, trade references and information regarding your suitability, to our clients including where you are engaged or contracted

to provide specific services to and for our clients' site/s. In such cases, we take increased precautions to protect the privacy of your personal information.

From time to time we may send your information overseas, including to overseas group members and to service providers or other third parties who operate outside of Australia. While such third parties will often be subject to privacy and confidentiality obligations, we shall do all things reasonably possible to ensure that appropriate data handling and security arrangements are in place. Notwithstanding, where you agree to this Privacy Policy you acknowledge that: (a) they may not always comply with those obligations or those obligations may differ from Australian privacy laws, including the Privacy Act and the APPs; (b) we will not be accountable for the third party under the Privacy Act; (c) you may not be able to seek redress under the Privacy Act; and (d) the third party may be subject to foreign laws which might compel further disclosures of personal information.

4. Credit Checks and Credit Reporting

When you apply to us for credit or propose to be a guarantor, we need to know if you are able to meet repayments under your agreement with us. We also want to avoid giving you further credit if this would put you in financial difficulty. One of our checks involves obtaining a credit report about you.

Credit reports

A credit report contains information about your credit history which helps us assess your credit applications, verify your identity and manage your credit accounts. Credit reporting bodies collect and exchange this information with credit providers like banks and other service providers such as suppliers like us.

What information can we exchange with credit reporting bodies?

The information we can exchange includes your identification details, what type of credit accounts you have with us, how much is outstanding, whether you have met your payment obligations and if you have committed a serious credit infringement (such as fraud).

We also ask the credit reporting body to provide us with an overall assessment score of your creditworthiness.

The credit reporting bodies we use are: Veda Advantage Information Services and Solutions Ltd,

National Credit Insurance (Brokers) Pty Ltd and Dun & Bradstreet (Australia) Pty Ltd.

You can download a copy of their respective privacy policies at:

- Veda – www.veda.com.au
- NCI – <https://www.nci.com.au>
- Dun & Bradstreet – www.checkyourcredit.com.au

What do we do with credit-related information?

We use information from credit reporting bodies to confirm your identity, assess applications for credit, manage our relationship with you and collect overdue payments. We may also use this information as part of arriving at our own internal assessment of your creditworthiness.

We store credit-related information with your other information.

You can access credit-related information we hold about you, request us to correct the information and make a complaint to us about your credit-related information.

5. Additional Information

Job applicants

If you apply for a position with us, we may also collect information about your qualifications, experience, character, screening checks (including health, trade or employment references, background, directorship, financial probity, identity, eligibility to work, vocational suitability, physiological results, drugs/alcohol and criminal record checks).

We collect, use and disclose your personal information to assess your application, conduct screening checks and consider and contact you regarding other positions.

We may exchange your personal information with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers. Without your personal information we may not be able to consider you for positions with us.

Employees and Sub-Contractors

This section applies to our current and former employees and contractors, in addition to the 'Job applicants' section above.

We may collect information relating to your current or former employment or engagement including trade references or information about your training, disciplining, resignation, termination, terms and conditions, emergency contact details, performance, conduct, use of our IT resources, payroll matters, union or professional/trade association membership, recreation leave and taxation, banking or superannuation affairs. We are required or authorised to collect your personal information under various laws including the *Fair Work Act*, *Superannuation Guarantee (Administration) Act* and *Taxation Administration Act*.

We collect, use and disclose your personal information for purposes relating to your employment or engagement with us including licenses (current or prospective), training, disciplining, payroll, superannuation, health and safety, administration and information, insurance (including WorkCover), next-of-kin details and staff management purposes.

We may exchange your personal information with your representatives (including unions) and our service providers including providers of payroll, banking, staff benefits, surveillance, training services and government authorities and bodies such as the Australian Tax Office. Without your personal information we may not be able to effectively manage your employment or engagement.

Please note that companies within the Alfasi Group are not bound by the Principles in relation to handling of their own current or former employees' records where directly related to the employment relationship. We may rely on this exemption notwithstanding this Privacy Policy.

6. Management and Storage of Personal Information

We hold personal information electronically and in hard copy form, at our premises in Victoria, on computer systems and servers centralised in Victoria and/or at offsite facilities using trusted third parties. We implement a range of measures to protect the security of that personal information, including but not limited to confidentiality requirements and education, document storage security policies, system and network security measures such as firewalls and data encryption, and, building and surveillance security.

We are also required to take reasonable steps to destroy or de-identify personal information when no longer needed for any permitted purpose.

7. Accessing, updating and correcting your Personal Information

Accessing your Personal Information

We ask that you contact us, in writing, to request:

- access to your personal information; and/or
- if applicable, a copy of current credit-related information we hold about you.

We will work with you to deliver and/or make available the information to you in a timely and efficient manner following your request. Before we give you the information, we will need to confirm your identity.

There is no fee for making the initial request, but in some cases there may be an access charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is an access charge, we will give you an estimate up front and confirm that you would like us to proceed. Generally, the access charge is based on an hourly rate plus any photocopying costs or other out-of-pocket expenses. You will however need to make the payment before we start, unless you have otherwise authorised us to debit your account.

In certain circumstances we are allowed to deny your request, or limit the access we provide. For example we might not provide you access to commercially sensitive information. In such cases, we will write to you explaining our decision and give you an opportunity to discuss our position.

Updating and Correcting your Personal Information

We realise that your personal information may change frequently.

We ask that you help us to ensure that the personal information we hold about you is accurate and up-to-date. Please contact us promptly to inform us of any changes to your personal information.

8. Privacy Complaints

If you have a concern about your privacy (including credit-related matters), you have a right to make a complaint and we will do everything we can to deal appropriately with your complaint.

To lodge a complaint, please contact us, by phone or in writing, using your point of contact or one of the customer service teams.

We acknowledge every complaint we receive and provide our name, a reference number and contact details of the person investigating the complaint. We will use all reasonable endeavours to keep you updated on the progress of your complaint and our resolution if any.

Usually, it takes only a few days to resolve a complaint. However, if we are unable to provide a final response within thirty (30) days, we will contact you to explain why and discuss a timeframe to resolve the complaint.

Credit-related information complaints

If your complaint is about our practices relating to credit-related information, then we may need to consult with other organisations, including credit reporting bodies or credit providers.

We will acknowledge receipt of the complaint within seven (7) days, however if we cannot resolve the

matter within thirty (30) days, we will contact you and explain the reason for the delay and discuss a timeframe to resolve the complaint.

9. Contact Details

You can contact the Alfasi Group about a privacy-related issue by phone, post or electronic communications:

alfasi group melbourne

Address: 73-79 Waterview Close, Dandenong
South Victoria 3175 Australia

Telephone: +61 3 8795 2999

Email: alfasi@alfasi.com.au

10. Updates to our Privacy Policy

Our Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment.

Last updated: August 2014