



Kingsgate

Consolidated Limited

PRIVACY POLICY

Kingsgate Consolidated Limited ("the Company") is required from time to time to collect, hold, use and/or disclose personal information relating to individuals (including, but not limited to, its customers, contractors, suppliers and employees) in the performance of its business activities.

This Policy is designed to ensure compliance in relation to the protection of personal information, as well as compliance with the Privacy Act 1998 (Cth) the ("Act") and the Australian Privacy Principles ("APPs") that regulate the handling of personal information.

Scope

This Policy covers governance for how we collect, use and manage personal information that Kingsgate collects.

Personal Information

What is Personal Information?

Personal information means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

This Policy does not apply to the collection, holding, use or disclosure of personal information that is an employee record. An employee record is a record of personal information relating to the employment of an employee. Examples of personal information relating to the employment of the employee include, but are not limited to, health information and information about the engagement, training, disciplining, resignation, termination, terms and conditions of employment of the employee.

What Kinds of Information does the Company Collect and Hold?

The Company collects personal information that is reasonably necessary for one or more of its functions or activities, or to comply with legal or regulatory obligations. If information is to be collected, it will be by lawful and fair means. The type of information that the Company collects and holds may depend on the relationship with the Company. For example:

- **Candidate:** if you are a candidate seeking employment with the Company, the Company may collect and hold information including your name, address, email address, contact telephone number, gender, age, employment history, references, resume, medical history, emergency contact, taxation details, qualifications and payment details.
- **Customer:** if you are a customer of the Company, the Company may collect and hold information including your name, address, email address, contact telephone number, gender and age.
- **Supplier:** if you are a supplier of the Company, the Company may collect and hold information including your name, address, email address, contact telephone number, business records, billing information, information about goods and services supplied by you.

- **Referee:** if you are a referee of a candidate being considered for employment by the Company, the Company may collect and hold information including your name, contact details, current employment information and professional opinion of candidate.

Sensitive information: the Company will only collect sensitive information where there is consent to the collection of the information and the information is reasonably necessary for one or more of the Company's functions or activities. Sensitive information includes, but is not limited to, information or an opinion about racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, membership of a trade union, sexual preferences, criminal record, health information or genetic information.

Disclosure of Personal Information

The Company may disclose personal information for any of the purposes for which it was collected, or where it is under a legal duty to do so. Any personal information you give us will be used solely for the purpose given and will not be shared, sold or given to any third parties, unless required or authorised under exemptions set out in the Privacy Act.

Disclosure will usually be internally and to related entities or to third parties such as contracted service suppliers.

Before the Company discloses personal information to a third party, the Company will take steps as are reasonable in the circumstances to ensure that the third party does not breach the APPs in relation to the information.

Access to Personal Information

If the Company holds personal information about you, you may request access to that information by putting the request in writing contacting us using the methods listed below. The Company will respond to any request within a reasonable period, and a charge may apply for giving access to the personal information.

There are certain circumstances in which the Company may refuse to grant you access to the personal information. In such situations the Company will give you written notice that sets out:

- the reasons for the refusal; and
- the mechanisms available to you to make a complaint.

Correction of Personal Information

If the Company holds personal information that is inaccurate, out-of-date, incomplete, irrelevant or misleading, it must take steps as are reasonable to correct the information.

If the Company holds personal information and you make a request in writing to correct the information, the Company must take steps as are reasonable to correct the information and the Company will respond to any request within a reasonable period.

There are certain circumstances in which the Company may refuse to correct the personal information. In such situations the Company will give you written notice that sets out:

- the reasons for the refusal; and
- the mechanisms available to you to make a complaint.

If the Company corrects personal information that it has previously supplied to a third party and you request us to notify the third party of the correction, the Company will take such steps as are reasonable to give that notification unless impracticable or unlawful to do so.

Integrity and Security of Personal Information

The Company will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that it:

- collects is accurate, up-to-date and complete; and
- uses or discloses is, having regard to the purpose of the use or disclose, accurate, up-to-date and complete.

The Company will take steps as are reasonable in the circumstances to protect the personal information from misuse, interference, loss and from unauthorised access, modification or disclosure.

If the Company holds personal information, it no longer needs the information for any purpose for which the information may be used or disclosed, the information is not contained in any Commonwealth record and the Company is not required by law to retain the information, it will take such steps as are reasonable in the circumstances to destroy the information or to ensure it is de-identified.

Emails

Any emails we receive from you will only be used for the purpose given and are subject to the conditions set out in this Privacy Policy. Please note, as email communication is not secure, any personal information you send via email is done so at your own risk.

Complaints

You have a right to complain about the Company's handling of your personal information if you believe the Company has breached the APPs.

If you wish to make such a complaint to the Company, you should first contact us using the methods below in writing. Your complaint will be dealt with in accordance with the Company's complaints procedure and the Company will provide a response within a reasonable period.

Contact Details

If you have any questions about this Privacy Policy, our privacy practices, concerns or if you wish to make a privacy complaint, please contact us.

- Email address: info@kingsgate.com.au
- Postal address: Suite 12.07, Level 12, 14 Martin Place, Sydney NSW 2000

Attributes

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Approved By: Board of Directors of Kingsgate Consolidated Limited

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