

## 1. Purpose

The purpose of this policy is to describe the way that Skybridge manages personal information, that is information about you that identifies you, or can be reasonably linked to your identity. It includes:

- how we collect, use, disclose and secure personal information;
- how you can access, correct or update your personal information; and,
- how to contact our Privacy Officer.

## 2. Scope

This Privacy Policy covers the operations of Skybridge Group Pty Ltd.

## 3. Definitions

APP	means the Australian Privacy Principles prescribed by the Privacy Act 1988
Personal information	means any information or opinion about an identified individual (natural person), or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and, (b) whether the information or opinion is recorded in a material form or not.
Sensitive information	means (without limitation) information about an individual's race, political opinions, religious beliefs, philosophical beliefs, membership of a trade union, sexual preference, criminal record, or health, genetic or biometric information, including "sensitive information" as defined in the <i>Privacy Act 1988</i>
We, us and our	are reference to Skybridge Group Pty Ltd
You and your	means a natural person whose personal information we have knowingly collected.

## 4. Policy

Skybridge Group Pty Ltd ("Skybridge") understands the importance of privacy. Skybridge is subject to and complies with the *Privacy Act 1998 (Cth)*, including the Australian Privacy Principles. Skybridge will also comply with any amendments to the Privacy Act, including any new or amended privacy principles, which may be introduced from time to time.

## 5. What personal information we collect

We collect personal information that is necessary to support our business activities or to comply with the law. The kinds of information that we collect depends on how you interact with us. For example we collect names, addresses, contact information, tax file number, drivers' licence number, qualifications, tickets and licences, employment history and health and wellbeing information, any other personal information you, or a person ostensibly authorised by you, submits to us, any other information that we consider is necessary (such as information about your opinions) to perform our functions and activities and any other personal information that we are authorised by law to collect.

### 5.1 How we collect personal information

We Collect personal information in a number of ways, including:

- a. where you provide information directly to us via telephone, email, SMS, our website, social media, contractor portal or post;
- b. where you attend one of our offices, we may collect security camera footage;
- c. where you provide information directly to us during sales, marketing or public events;
- d. where you provide information directly to us during a recruitment process;
- e. where you provide information to us during a contractor engagement process;
- f. where you complete feedback forms;
- g. where you interact directly with our employees and such other persons acting for us or on our behalf, such as our contractor engagement team, customer service teams or human resources team;

- h. where you work for one of our service providers or service delivery partners;
- i. from principal contractors;
- j. from related entities in our corporate group; and,
- k. from publicly available sources of information.

5.2 Where we collect, use or disclose sensitive information about you, we will only do so where it is reasonably necessary to conduct our business and either:

- a. we have obtained your consent; or,
- b. it is permitted by law.

5.3 If you do not wish for your personal information to be collected in a way anticipated by our Privacy Policy, we will use reasonable endeavours to accommodate your request. If we do comply with your request, or you provide us with inaccurate or incorrect information, we may not have sufficient information to conduct our business and we may be limited:

- a. in our ability to provide our services;
- b. in our ability to keep you informed of company updates and services information;
- c. in considering your application for employment with us;
- d. in our ability to contract with you; and,
- e. in our ability to respond to your inquiry or request.

## 6. Purpose of collection, use and disclosure

6.1 We collect, use and disclose personal information for the primary purpose of conducting our business, which includes:

- a. confirming your identity;
- b. assessing your employment application and suitability for employment with us;
- c. caring for your health and wellbeing during your employment with us;
- d. assessing and managing the delivery of goods and services, in particular:
  - i. telecommunication installation and maintenance;
  - ii. solar and battery installation and maintenance; and,
  - iii. medical and security devices installation and maintenance.
- e. delivering services and company updates to you to inform you about new goods or services or information about projects being undertaken;
- f. conducting probity checks for contractors and their workers;
- g. conducting credit checks with credit reporting bodies;
- h. assessing an application to us for credit;
- i. conducting probity checks for some specialised or potential high-level employees;
- j. providing information to debt collection agencies, solicitors and legal representatives for the purpose of recovering debts;
- k. managing customer accounts and billing;
- l. conducting satisfaction surveys;

- m. compiling and maintaining mailing lists derived from our website or our hardcopy forms and communicating with persons on those lists;
- n. collection and disclosing personal information to related bodies corporate in connection with corporate operations;
- o. fulfilling contractual obligations to clients;
- p. fulfilling obligations to, and cooperating with, government authorities; and,
- q. where you otherwise provide your consent, whether express or implied.

## 7. Disclosure of Personal Information

We disclose your personal information to people and organisations for the purposes set out in Section 4 above. Additionally:

- 7.1 We disclose your personal information to service providers or service delivery partners, principal contractors, clients, agents or to related entities of Skybridge.
- 7.2 If we disclose your personal information to a third party, we will take reasonable steps to ensure that the third party does not breach the APPs in relation to that information. Unless you have agreed, these parties are not allowed to use your personal information for any other purpose except to assist in conducting our business.
- 7.3 We may also disclose your personal and sensitive information to:
  - a. credit reporting bodies for the purposes permitted under the Privacy Act;
  - b. health practitioners where this is necessary for the health of the individual or to any other person where permitted under the Privacy Act and other applicable law;
  - c. law enforcement agencies where the law requires us to do so; or
  - d. to other parties, where you have consented for us to do so.
- 7.4 We also disclose your personal information with people and organisations that help us with our business, such as professional advisors, IT support, and corporate and administrative services.
- 7.5 As at the date this privacy policy was most recently updated, your personal information will not be disclosed overseas.

## 8. Direct Marketing

- 8.1 When you provide your personal details to us, you consent to us using your personal information for direct marketing purposes (for an indefinite period).
- 8.2 From time to time, we may contact you with information about products or services offered by us, our related entities and our business partners or clients, which we think may be of interest to you. When we contact you, it may be by mail, telephone, email, our contractor portal or SMS.
- 8.3 Where we use or disclose your personal information for the purpose of direct marketing, we will:
  - a. allow you to 'opt out' or in other words, allow you to request not to receive direct marketing communications; and
  - b. comply with a request by you to 'opt out' of receiving further communications within a reasonable time frame.
- 8.4 We will only ever contact you if you have consented to direct marketing, and you can ask to be removed from our marketing lists at any time by directly contacting us. If you don't wish to receive direct marketing materials, contact our Privacy Officer using the details set out at the end of the Privacy Policy.

## 9. Security of your Personal Information

- 9.1 We will use all reasonable efforts to ensure that the information you provide us remains private and take all reasonable steps to protect your personal information from misuse, loss or unauthorised access, modification or disclosure.
- 9.2 Where we store your personal information electronically, for example on our document management system, there are restrictions as to who has access to that information through file permissions and password protection. We have firewalls, intrusion detection and virus scanning tools to help prevent viruses, malware and unauthorised people accessing our systems.
- 9.3 We use a mix of Identification cards, alarms and cameras and other controls to protect our offices. All hardcopies of personal information are stored in lockable filing cabinets.
- 9.4 Although we take all reasonable measures, we are not responsible for third party circumvention of security measures on our electronic databases or at any of our premises. Please note that third party recipients of personal information may have their own privacy policies and we are not responsible for their actions, including their handling of personal information. We cannot control the actions of other users with whom you share your information. Further, we cannot guarantee that only authorised persons will access your personal information and cannot guarantee that information you share with us on our website or contractor portal will not become publicly available.
- 9.5 Please notify our Privacy Officer immediately if you believe there has been any unauthorised access to your information.
- 9.6 When your personal information is no longer needed for a purpose for which it was collected, and no applicable law requires us to retain that information, then we will take all reasonable steps to destroy or permanently de-identify it.

## 10. How to access, correct or update your Personal Information

- 10.1 You may request access to personal information that we have collected from you, by writing to our Privacy Officer (see below). Upon your request, we will provide access to your personal information within a reasonable timeframe, except in certain circumstances as permitted under the Privacy Act. If we deny access, we will give you written reasons for this decision.
- 10.2 We will not charge for access to your personal information, unless your request is complex or incurs archive retrieval fees.
- 10.3 We will use reasonable steps to ensure the personal information we hold is complete, up to date and accurate, so far as it is practicable for us to do so. If you think that the personal information that we hold about you is incorrect or out of date, please contact our Privacy Officer (see below).
- 10.4 Subject to paragraph 8.6, if personal information we hold about you is incorrect, we will, on your request to correct it and where we are satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading, take such steps as are reasonable in the circumstances to ensure that the information is corrected.
- 10.5 If you wish to have your personal information deleted, please let us know and we will delete the information wherever practicable. If we become aware that your personal information is no longer needed for any of our purposes, we will take reasonable steps to de-identify or destroy it.
- 10.6 If you request us to correct personal information that we hold about you and we refuse to do so, we will, to the extent reasonable, provide you a written response as to our reasons.

## 11. Questions and complaints

- 11.1 If you have a question about how we handle personal information or wish to lodge a complaint about our compliance with the Privacy Act, you may contact our Privacy Officer.
- 11.2 The Privacy Officer will co-ordinate the investigation of any complaint and any potential resolution of a complaint. We will respond to you within 30 days. If we can't give you a final response in this time, we'll contact you to tell you why and work out a new timeframe.
- 11.3 If you are dissatisfied with how we managed your complaint, you can ask us to review your complaint. Or you can complain to the Office of the Australian Information Commissioner, whose website is: [www.oaic.gov.au](http://www.oaic.gov.au)

## 11.4 How to contact our Privacy Officer

If you would like more information about our approach to privacy, or have any questions or concerns, please contact our Privacy Officer:

Email: [privacyofficer@skybridge.com.au](mailto:privacyofficer@skybridge.com.au)

The Privacy Officer,  
Skybridge Group Pty Ltd  
Unit 4, 101-105 Keilor Park Drive, VIC 3043

## 12. Changes to this Policy

We may change this Privacy Policy at any time. If we make changes to this Privacy Policy we will notify you by publication on our website [www.skybridge.com.au](http://www.skybridge.com.au). For workers of Skybridge this Privacy Policy will be published on the intranet. The revised version of the Privacy Policy will be effective at the time we post it.

## 13. Document History

Date	Version	Summary of Changes	Author
Jan 2015	4	Unknown	Unknown
12/07/2017	5	Added Document History and Approvals	HRBP
20/12/2018	6	Significant rewrite and removal of 'Procedure' from name of document	CHRO
11/03/2020	7	Updated definition of Personal Information. Addition of caring for your health and wellbeing in clause 6.	CHRO

## 14. Approvals

This document has the following approvals. Signed approval forms are filed with Skybridge's Corporate Governance Register.

Date	Version	Name	Title
Jan 2015	4	Michael Abela	CEO
12/07/2017	5	Dawn Lackie	CHRO
20/12/2018	6	Dawn Lackie	CHRO
11/03/2020	7	Dawn Lackie	CHRO