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HACER GROUP – PRIVACY POLICY

Last Review Date:

Next Review Date:



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1. Introduction

- 1.1. This Privacy Policy applies to the handling of personal information by Hacer Group and all related entities and bodies corporate, in relation to its business operations, including:
 - (a) the delivery and management of construction and design projects, site operations and inductions, quality management, procurement activities and post-construction activities;
 - (b) contract administration, human resources, health, safety and environmental management, and finance and payroll activities; and
 - (c) its use of related systems, platforms and communication channels.
- 1.2. This Privacy Policy sets out how we collect, store, process, use and disclose personal information (including personal information we collect, and personal information submitted to us, whether offline or online).
- 1.3. For example, this may include information we collect from you:
 - (a) when you make an inquiry, visit one of our properties, premises or building sites, participate in a tender or procurement process, enter into or perform a contract with us, apply for a role with us, work with us in connection with our construction projects; or
 - (b) when you otherwise interact or communicate with us or our subcontractors, consultants, suppliers or other representatives, including by attending a Hacer Group event or meeting, or using our online forms or platforms.
- 1.4. In this Privacy Policy:
 - (a) “we”, “us” and “our” refers to Hacer Group or a Hacer Group Member as the context requires; and
 - (b) “you” and “your” refers to any individual about whom we collect personal information.
- 1.5. Hacer Group is an Australian commercial construction company providing fully integrated design and construction services. Since its establishment in 2000, Hacer Group has delivered projects across the commercial, residential, health, retail and mixed-use development sectors.
- 1.6. Hacer Australia Pty Ltd (ACN 650 862 721) and its related entities (together, **Hacer Group, we, our** or **us** and each a **Hacer Group Member**) are committed to managing personal information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), Australian Privacy Principles (**APPs**) under the Privacy Act and other applicable privacy laws that apply to us.
- 1.7. We understand the importance of being open and transparent about the way we collect, hold, store, use and share your personal information, and we take protecting your privacy seriously.
- 1.8. As part of its operations, Hacer Group collects personal information to manage and deliver its projects and services, maintain relationships with clients, contractors, consultants and suppliers, recruit and manage employees and job applicants, administer projects, respond to enquiries, and meet its legal, regulatory and business obligations. The collection of personal information enables Hacer Group to effectively operate its construction and development business and support the delivery of its projects and services.
- 1.9. We also collect personal information about you to enable us to establish that you are a reputable, qualified and financially solvent person or company with which to do business.
- 1.10. We encourage you to read this Privacy Policy. If you have any questions, please contact us using the details in [Section 11 – For More Information & Support](#).
- 1.11. Hacer Group will regularly review its policies and procedures regarding personal information and may update this Privacy Policy from time to time, with or without notice to you. However, where we make a material change to this Privacy Policy, we will provide notice to you (including by updating our website at www.hacer.com.au (Website), and where appropriate, notifying you directly).



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- 1.12. Any updated Privacy Policy will be made available on our website or on request. We recommend that you visit this Privacy Policy regularly to keep up to date with any changes we make.
- 1.13. Other privacy related notices and terms and conditions may apply to you, including:
- (a) privacy and security terms and conditions contained in contractual agreements you enter into with us; and
 - (b) a privacy collection notice provided at the time personal information is collected (for example as part of employment onboarding or if you apply to work on one of our projects as a contractor).

2. Personal Information

- 2.1. “Personal information” is defined in the Privacy Act, and means information or an opinion about an identified individual, 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.
- 2.2. In this Privacy Policy, whenever we use the term “personal information”, we are referring to this legal definition.
- 2.3. Personal information does not include:
- (a) aggregated or de-identified data;
 - (b) business information that does not identify a person or reasonably identify an individual (for example, in certain circumstances, business payment details); or
 - (c) project information that does not identify a person or reasonably identify an individual (i.e. budgets, timelines, tender outcomes, construction milestones).
- 2.4. You may interact with Hacer Group in a variety of different ways and the types of personal information that we collect about you will depend on the dealings you have with us.
- 2.5. For example, we may collect your personal information:
- (a) in-person when you visit our properties, premises or building sites or make an online or telephone enquiry;
 - (b) when you apply to work for us or on one of our projects (whether as an employee, subcontractor, consultant, supplier or client);
 - (c) when you provide us with an estimate or engage in the tender process (i.e. submit a tender or attend a tender interview);
 - (d) indirectly from third parties, such as other builders, subcontractors, developers or your representatives; and
 - (e) indirectly from publicly available sources or our records in relation to past dealings with you.
- 2.6. Generally speaking, the kinds of personal information that Hacer Group collects may include:
- (a) **Personal and Contact Details:**
 - This may include your full name, address, gender (where relevant), job title and organisation details, telephone number, signature, email address and date of birth.
 - We may collect this information, as relevant, directly from you in-person, over the phone, via email or via our website in the following situations:
 - i. if you are one of our subcontractors, suppliers, clients or consultants, or otherwise do business with us, in order to manage our relationship with you;
 - ii. if you enter a contract with us at any point during the project lifecycle;
 - iii. if you submit a tender application;

- iv. if you are applying to work with us (regardless of whether you are a successful or unsuccessful candidate);
- v. if you lodge a claim with us;
- vi. if you are an offshore inspection attendee or supplier arriving in Australia; or
- vii. if you are injured or involved in a work, health and safety incident while at work.

- We may also collect this information about you indirectly from third parties, for example:
 - i. from clients, contractors, subcontractors or suppliers;
 - ii. from your referees or previous employers;
 - iii. from recruitment service providers;
 - iv. from professional registration authorities;
 - v. from publicly available sources, such as Australian Securities and Investments Commission (**ASIC**).

(b) Employee, Worker and Workplace Information:

- This may include:
 - i. employment history and evidence of your eligibility to work;
 - ii. information about your qualifications, licences, certifications and tickets;
 - iii. insurances information;
 - iv. training and competency records;
 - v. your suitability for the role you are applying for;
 - vi. referee details;
 - vii. emergency contact and next of kin;
 - viii. superannuation details;
 - ix. details of any workers compensation claims you have made;
 - x. other relevant information provided as part of our recruitment process or during your working relationship with us; and
 - xi. records relating to your use of our systems, devices and facilities.
- We may also collect sensitive information, such as:
 - i. medical information;
 - ii. injury and incident records;
 - iii. records of disciplinary investigations, incident reports and regulatory interventions;
 - iv. details of leave you have applied for or been approved to take (for example domestic violence leave);
 - v. trade union membership information.
- We may collect this information directly from you through our recruitment process when you apply for a position with us, during onboarding or otherwise during your working relationship with us (for example if you apply or are engaged to work on one of our projects).
- We may collect this information:
 - i. if you apply to work with us directly or on one of our projects as a contractor, such as completing an application or onboarding form;
 - ii. if we provide you with an employment contract;
 - iii. if you submit a tender application or otherwise seek to work with us in your capacity as a contractor, subcontractor, consultant or client;
 - iv. if you are injured while at work;
 - v. if you are involved in a workplace grievance, disciplinary action or other work, health and safety matter; or
 - vi. if you contact us via email, phone or web form (including third party platforms we use for managing employee data).
- We may also collect this information about you indirectly from third parties or publicly available information, for example:
 - i. from third-party recruitment service providers;
 - ii. from referees and previous employers;
 - iii. from verification providers or professional registration authorities; or
 - iv. from your employer or former employers;
 - v. from public websites such as LinkedIn.

(c) Cultural, Linguistic Diversity and Social Purpose Information:

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- This may include:
 - i. details about your cultural, ethnic and linguistic diversity;
 - ii. what languages you speak and whether you speak a different language at home;
 - iii. whether you are a refugee or asylum seeker; and
 - iv. if you identify as a person with a disability.
- Generally speaking, this information is sensitive information.
- Often this information is optional, however, it may be required in certain circumstances.
- We may collect this information directly from you:
 - i. when you apply to work with us directly or on one of our projects as a contractor, including through recruitment, application or other onboarding processes;
 - ii. in connection with your employment or engagement with us;
 - iii. during the course of working with us or for us, including where you participate in workplace surveys or provide information required for reporting on a specific project.
- In certain circumstances we aim to collect this information in an anonymised format (for example when conducting a survey). However, this is not always possible and you may need to be identified or may be identifiable due to the sample size.
- We collect this information in order to produce social procurement metrics and to tailor any training and communications for our project workforce.

(d) Background Check Information:

- This may include:
 - i. security and background clearance information;
 - ii. national police checks, if applicable – this may include sensitive information, such as if you have a criminal record.
- We may collect this information directly from you through our recruitment process, when you apply for a position with us, or otherwise during your employment.
- We may also indirectly collect this information:
 - i. from third parties (for example, an accredited police check provider, referees, previous employers, professional registration authorities, or our contractors that employ you); or
 - ii. publicly available information (for example, court decisions).

(e) Proof of Identity Information:

- This may include:
 - i. your drivers' licence;
 - ii. your passport;
 - iii. your visa, if applicable; and
 - iv. other similar identity information.
- We may collect copies of your identity documents directly from you through our onboarding processes, system forms/applications and other document exchange processes, where necessary:
 - i. in the course of setting up company credit cards,
 - ii. managing employee and contractor onboarding,
 - iii. site access, health and safety, compliance checks, or
 - iv. for travel and business administration purposes.

(f) Work, Health and Safety Information:

- This may include:
 - i. medical information;
 - ii. workplace, injury, incident and safety investigation records;
 - iii. witness statements;
 - iv. site attendance, access and induction records;
 - v. licences, qualifications, tickets and training records;
 - vi. CCTV footage and other site security records;
 - vii. vehicle registration and access information (where relevant);
 - viii. records relating to regulatory investigations or interventions; and

ix. building, site, plant and equipment information and reports that are associated with you.*

- We collect this information when an employee, subcontractor, consultant or prospective employee completes the relevant onboarding processes, site inductions, compliance checks, training and competency processes, or when an incident occurs at a Hacer Group site.
- Information may be collected through internal and external forms, emails, phone calls, SMS, handwritten notes, photo and video footage, and third-party platforms that we use for construction safety management and other informal or ad-hoc methods.

*This is context dependent, for example if you prepare a building report, your name is personal information, but the building report is generally not as this is about the building. However, if a regulator later reviews the report in the context of an investigation into allegations of negligence by you, the report findings may also constitute your personal information).

(g) Financial and Payment Information:

- This may include:
 - i. your tax file number;
 - ii. banking and payroll information;
 - iii. information found in novation agreements;
 - iv. salary related information;
 - v. information about transactions that you undertake in respect of any Hacer Group services;
 - vi. insurance information; and
 - vii. your bank account or credit card details.
- We may collect this information:
 - i. if you enter into, or propose to enter into, a transaction with us, including through contracts, subcontracts, tender submissions, payment claims, supplier and subcontractor invoices and claims and compliance documentation;
 - ii. if you apply to work for Hacer Group in your capacity as an employee, supplier, subcontractor, consultant or client; or
 - iii. during your employment with us, including through payroll onboarding forms and payroll systems, and through third-party platforms such as PayApps where contracts, payment claims and insurance documents may be uploaded.
- We may collect this information directly from you if you work for us as an employee and indirectly from third parties, such as your employer.

(h) Company Information:

- This may include:
 - i. company information such as your company's and directors' details; and
 - ii. information about your company's employees, contractors or suppliers.
- In some cases, the information we collect about your company may not be personal information (e.g., ABN and ACN details).
- We may collect this information from you:
 - i. as part of our onboarding process if you are a current or prospective supplier, subcontractor or contractor,
 - ii. through tender submissions, contracts and subcontract agreements; or
 - iii. payment claims, invoices, insurance documents and compliance documentation.
- We may also collect this information from publicly available sources, such as ASIC.

(i) Surveillance and Visual Records:

- This may include:
 - i. CCTV footage, photographs, video recordings and audio recordings;
 - ii. time-lapse recordings of construction sites;
 - iii. site inspection, defect and remedial work photos and videos; and
 - iv. images or recordings captured as part of site management, safety or security activities.
- We may collect this information from you when you enter our properties, premises and building sites, including if you are engaged or contracted to work on one of our projects or if you otherwise visit or attend one of our premises or building sites.

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- We may deploy purpose-built construction monitoring cameras on-site that capture time lapse images of the project build, which may from time to time capture incidental images of any person on site.
- On building sites, CCTV footage is accessible by us and the relevant client.

(j) **Online and Digital Services Information:**

- This may include information (that is not always identifiable on its own) including:
 - i. network and device information (such as your device ID, device type and IP address);
 - ii. geo-location information;
 - iii. browsing information, including information about how you interact with our website, pages you visit, what content you view and your session duration;
 - iv. webform inputs such as your name, postcode, email address and phone number;
 - v. transaction data; and
 - vi. information collected from cookies and/or online tracking technologies.
- We may collect this information when you use our website, submit forms, interact with our systems, and/or via the use of online behavioural tracking technologies such as cookies. Please see [Section 06 – Cookies, Pixels and Other Third-Party Online Tracking Technologies](#) below for further information on the digital information we collect and when it may become personal information.

(k) **Offshore Procurement:**

- This may include:
 - i. personal information (i.e. name, address, phone number and email address etc.);
 - ii. passport photo page;
 - iii. images, video and audio recordings (video linked virtual mock-up recording, prototype inspection photos and videos, site inspection and observation photos and videos, post-construction defect and remedial work photos and videos).
- We may collect details from you if you are an inspection attendee or supplier entering Australia in order to attend a Hacer Group property, premises or building site.
- We may also collect photos, videos and audio site records for the purpose of developing prototypes or observing post-construction defects or remedial work. This may sometimes include incidental images of individuals that may be personal information.

(l) **Your Feedback, Communications, Complaints and Dispute-Related Information:**

- This may include information contained in:
 - i. emails, phone calls, SMS, handwritten notes;
 - ii. referrals; and
 - iii. correspondence, complaints, dispute resolution processes, legal proceedings and settlement agreements.
- We may collect this information:
 - i. when you contact or correspond with us;
 - ii. when you submit a form;
 - iii. when you provide information in person, by phone, email, SMS or another messaging platform; or
 - iv. when information is provided by another party.
- We may also collect this information through contracts and agreements, system forms/applications, referrals, complaints, settlement processes, dispute resolution processes and other dealings with you.

(m) **Unsolicited Information:**

- Unsolicited personal information is personal information we receive that we have taken no active steps to collect. We may collect this information directly from you. Please note that we may keep records of unsolicited personal information to the extent we are permitted to do so under the Privacy Act.
- If not, we will destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable for us to do so.



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- 2.7. Hacer Group may also collect other kinds of personal information that is reasonably necessary for us to carry out our functions and activities for which we will notify you of at the time of collection.
- 2.8. In some cases, you may provide us with personal information which relates to another person (for example, your next of kin, a family member, or a job referee). In doing so, you agree that you have received permission from these individuals for us to collect, use, and disclose their personal information in accordance with this Privacy Policy. This policy should be made available to them.
- 2.9. You are under no obligation to provide your personal information to Hacer Group. We will provide individuals with the option of not identifying themselves, if it is lawful and practicable to do so. For example, you can access our website, make general phone queries or email us without having to identify yourself.
- 2.10. However, without receiving certain information from you, Hacer Group may not be able to provide you with our full scope of services or information that is tailored to your needs, and we may be limited in how we can interact with you. For example, if you do not provide us with your personal information, we may be unable to respond to your job application, arrange site access or inductions, process payments or respond to defect or warranty claims.

3. Collection, Storage and Use of Personal Information

- 3.1. Generally speaking, Hacer Group collects and uses personal information so that we can:
- (a) provide, improve and promote our construction and design services and other related offerings; and
 - (b) establish that you are a reputable, qualified and financially solvent person or company with which to do business.
- 3.2. We may also use your personal information for purposes incidental to the above, for other purposes within your reasonable expectation, or as otherwise permitted by law.
- 3.3. The purpose for which we usually collect, store, and use your personal information depends on how you interact with us, but may include the following purposes:
- (a) **To Do Business with You:**
 - We may handle your personal information to:
 - i. establish, manage and maintain our relationships with clients, subcontractors, suppliers, consultants and other business partners;
 - ii. engage, contract with and administer subcontractors, suppliers and consultants;
 - iii. verify your identity and other information relevant to our business relationship with you; and
 - iv. conduct due diligence, commercial credit and financial checks, and manage fraud and other business risks.
 - (b) **To Manage and Administer Our Construction Projects**
 - We may handle your personal information to:
 - i. provide and manage our construction, design, procurement and related services, including communicating with clients, subcontractors, consultants and suppliers in connection with our projects;
 - ii. manage project delivery, administration, tendering, contracting, quality assurance and document control processes;
 - iii. manage project personnel, site access, inductions and compliance requirements;
 - iv. maintain workplace health and safety standards, including managing incidents, investigations and regulatory reporting requirements;
 - v. monitor and secure our project sites, premises and assets, including through the use of CCTV and other security measures; and
 - vi. manage post-construction services, defects, warranty claims, inspections, repairs and dispute resolution processes.
 - (c) **To Manage Offshore Procurement:**
 - We may handle your personal information to:

- i. manage façade and joinery procurement activities, including tendering, contracting, design coordination, and quality assurance with external suppliers and contractors; and
- ii. arrange and coordinate travel and related logistics for employees, contractors, clients, consultants and other personnel attending offshore supplier, factory, manufacturing or quality assurance inspections.

(d) To Manage Employment and Working Relationships:

- We may handle your personal information to:
 - i. assess your suitability for employment, engagement or placement opportunities with us;
 - ii. manage recruitment, onboarding, workforce planning, performance management and offboarding;
 - iii. administer payroll, benefits and other employment-related arrangements;
 - iv. manage site access, inductions, licences, tickets, qualifications, training and competency records;
 - v. manage workplace health and safety, including incidents, investigations and return-to-work processes;
 - vi. respond to workplace complaints and employment-related issues; and
 - vii. comply with applicable legal, regulatory and record-keeping requirements.

(e) To Manage Any Inquiries and Feedback:

- We may handle your personal information to:
 - i. respond to requests for information and other general inquiries about our services; and
 - ii. investigate any complaints made about you, if we have reason to suspect that you are in breach of any of our terms and conditions, or you have otherwise engaged in or are suspected of being engaged in any unlawful activity.

(f) To Manage and Improve Our Operations and Business:

- We may handle your personal information to:
 - i. manage and operate our business, including delivering our services and managing our day-to-day operations;
 - ii. manage finance, accounting, payroll, invoicing, reporting, insurance and other administrative functions;
 - iii. manage tenders, bids, procurement activities and business opportunities;
 - iv. maintain accurate, complete and up-to-date business records;
 - v. maintain, protect and improve our I.T. systems, networks and security;
 - vi. protect the security of our people, premises, project sites, assets and information;
 - vii. administer and improve our website, systems, products and services, including through research, analytics, testing and business improvement activities; and
 - viii. communicate with you about our business, services, projects, events and other matters that may be of interest to you, including by sending marketing communications where permitted by law.

(g) To Manage Any Potential Business, Share Sale or Corporate Restructure:

- We may handle your personal information for the purpose of facilitating or implementing any actual or potential transfer or sale of all or part of our assets or business or if we undergo any other kind of corporate restructure, acquisition or sale (including during the course of due diligence).

(h) To Comply with Legal and Regulatory Obligations:

- We may handle your personal information to:
 - i. comply with applicable laws, regulations and industry standards;
 - ii. respond to requests or requirements from regulators, government agencies, courts and tribunals;
 - iii. manage legal claims, disputes, complaints and insurance matters; and
 - iv. meet our record-keeping, reporting and compliance obligations.

(i) To Support Social Procurement and Workforce Diversity:

- We may handle certain personal information you provide to us to:
 - i. support our social procurement reporting obligations and to measure our performance against the Victorian Government Social Procurement Framework metrics; and
 - ii. respond to client, contractual and regulatory reporting requirements;
 - iii. better understand the composition and diversity of our workforce;
 - iv. identify, develop and evaluate diversity, equity and inclusion initiatives;
 - v. tailor training, communications and engagement activities to the needs of our workforce, including in relation to our Anti-Modern Slavery program and steps we are taking to assess and address modern slavery risks; and
 - vi. identify and provide appropriate workplace support, adjustments and accessibility measures (where relevant and with the individual's involvement).

(j) **To Create Deidentified or Aggregate Data for Data Analytics Activities:**

- We may collect, store and use your personal information to create deidentified or aggregate data sets (which are no longer personal information). We do this by deidentifying or aggregating your information such as combining your information with information we have.

- 3.4. In addition to the purposes listed above, Hacer Group may use your personal information for other purposes which we will notify you of when we collect your personal information and for purposes you have authorised or that we are otherwise permitted or required by law.
- 3.5. Hacer Group only uses and discloses your personal information for the purpose for which it was collected, including related secondary purposes as permitted by privacy laws.

4. Automated Decision Making

- 4.1. Hacer Group does not currently engage in automated decision-making that could reasonably be expected to significantly affect the rights or interests of an individual. If this changes, we will update this Privacy Policy accordingly.

5. Sharing of Personal Information

- 5.1. Hacer Group may share your personal information with third parties:
- (a) for the purposes for which we collect it, as set out in [Section 03 - Collection, Storage and Use of Personal Information](#) of this Privacy Policy;
 - (b) for other purposes, if we notify you of such a purpose when we collect the information; or
 - (c) where we have otherwise received your consent, or the disclosure is required or authorised by law.
- 5.2. Some of the third parties we may share your personal information with include the following:
- (a) **Hacer Group:**
 - We may share your personal information with individuals and related entities within Hacer Group, including employees and related bodies corporate to perform our business activities.
 - This means that one Hacer Group Member may share personal information with another Hacer Group Member, including where a Hacer Group Entity provides backend services to Hacer Group.
 - (b) **Service Providers and Advisors:**
 - We may share your personal information with a variety of our service providers to assist us with providing, promoting, and managing our products and services. These may include our:
 - i. IT and software service providers;
 - ii. recruitment and workforce platforms;
 - iii. financial and credit service providers;
 - iv. marketing and communications agencies;

- v. data analysis organisations; and
- vi. professional advisors and consultants (such as legal, insurance and financial advisors).

(c) **Subcontractors, Suppliers, Clients, Consultants and Other Entities We Do Business With:**

- We may share your personal information with our:
 - i. subcontractors;
 - ii. suppliers;
 - iii. consultants (such as architects and engineers);
 - iv. our existing or potential agents, business partners or joint venture entities or partners;
 - v. service providers;
 - vi. clients; and
 - vii. other entities we do business with, to assist in providing our services.

(d) **Referees:**

- We may share your personal information with your nominated referees to validate details you have provided us with, including your resume, qualifications, experience, training or abilities.

(e) **Travel Agents**

- If you are travelling for work purposes, we may share your personal information (which includes passport information) with airlines, accommodation providers (such as hotels) and travel agents.

(f) **Corporate Restructure:**

- We may share your personal information with third parties, whether affiliated or unaffiliated, for the purpose of facilitating or implementing a transfer or sale of all or part of our assets or business or if we undergo any other kind of corporate restructure, acquisition or sale. In this context, your personal information may be transferred to another entity (or if such a sale, transfer, acquisition or corporate restructure is being contemplated by us).

(g) **Industry Fund and Scheme Administrators:**

- We may share your personal information with employment-related industry fund and scheme administrators, such as:
 - i. CoINVEST (now known as LeavePlus) in relation to long service leave entitlements in Victoria; and
 - ii. Incolink for insurance claims and other worker entitlement arrangements.

(h) **Independent Investigators:**

- We may share your personal information with independent investigators engaged or authorised by us to conduct workplace or other investigations, including in relation to complaints, misconduct, workplace health and safety incidents, or other compliance matters requiring independent review.

(i) **Trade Unions:**

- In limited circumstances, we may share your personal information with trade unions or employee representatives where necessary to facilitate lawful workplace relations activities, comply with workplace laws, respond to workplace health and safety matters, manage disputes or grievances, or otherwise where authorised or required by law.

(j) **Government, Regulators and Law Enforcement Agencies:**

- We may share your personal information with regulatory bodies, government agencies and law enforcement bodies to comply with our legislative or regulatory obligations, such as:
 - i. Fair Work Australia for employment-related purposes;
 - ii. the Australian Taxation Office for tax-related purposes;



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- iii. WHS regulators and government agencies, including WorkSafe Victoria and SafeWork NSW; and
 - iv. the relevant building regulator if a formal direction is issued to a subcontractor.
- 5.3. We generally store and handle your personal information in Australia. However, in the course of performing our business functions and activities, we may also share or transfer your personal information with overseas recipients that are located in China, New Zealand, Philippines, Singapore and the United Kingdom. These recipients include our service providers who may handle, process or store your personal information on our behalf and our overseas clients, travel agents and suppliers that assist us with offshore procurement activities.
- 5.4. We may also disclose your personal information to an overseas recipient where you have provided your consent, or we are otherwise permitted to do so under applicable laws.
- 5.5. When you access our website or other online services, we may provide, as a convenience to you, links to third party websites, including sites operated by our partners, associates, or independent third parties. For example:
 - (a) if you apply for a tender advertised by Hacer Group, our website provides you with a link to third party website 'Estimate One', which is a tender submission platform designed for use by the Australian construction industry; or
 - (b) if you register your interest to apply for an advertised role at Hacer Group, such as Hacer Group Graduate Program, our website provides you with a link to a third-party website 'Elmo Talent', which is a human resources and job application platform.
 - (c) Each linked website has its own privacy practices which may differ from ours, and we encourage you to read the relevant privacy policy before submitting any personal information to that site. We have no control over and are not responsible for information you submit to third-party sites.

6. Cookies, Pixels and Other Third-Party Online Tracking Technologies

- 6.1. Hacer Group may collect statistical information when you access and use our website and any online platforms available via our website, by utilising features and technologies of your internet browser, including cookies and tracking pixels. We use these tracking technologies for a variety of purposes, including to:
 - (a) collect data about our website traffic;
 - (b) analyse how our website is being used,
 - (c) improve our website; and
 - (d) provide a more user friendly website and online services.
- 6.2. These features and technologies do not specifically identify you unless you otherwise provide personal information to us that enables identification. As such, information collected through these tracking technologies may be personal information.
- 6.3. A '**cookie**' is a small file stored on your computer's browser, which helps us better understand our users and assists us to deliver content via our website. We collect certain information via cookies, such as your device type, browser type, IP address, and pages you have accessed on our website. Our website contains cookies from third party providers we use, including our website provider.
- 6.4. A '**tracking pixel**' is a piece of code that a business or third-party provider can place on its website or in an email to collect information about a user's activity, including the site pages they visit, time spent on each page, IP address, and/or form inputs (as relevant). When users visit pages with pixels, the pixel "loads" and sends the information it is designed to collect back to the server, e.g. in the case of third-party pixels this would be to the third-party service provider.
- 6.5. If you do not wish to receive any cookies (other than those that are strictly necessary) you can change your web browser preferences to control how the browser deals with cookies. Depending on



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which browser you use, you may be able to disable certain third-party cookies. Please note that if you disable certain cookies, you may be unable to access certain pages or content on our website.

- 6.6. To change your web browser preferences, please visit the relevant preferences or settings page on your browser and amend the privacy settings in relation to cookies and site data. It may be necessary for you to opt out separately from each device and browser that you use to access online content.
- 6.7. We also use third-party service providers, such as our website provider, that may collect data related to your use of our online services through a suite of tracking technologies, such as third-party cookies, tracking pixels and web beacons, for analytic and/or marketing purposes.
- 6.8. These third party providers may update their policies and settings from time to time, so we encourage you to review their terms and policies for more information on their data collection practices and options available to you for managing your privacy. Please note that how these third parties handle and use your data is governed by their own privacy policies, not ours.

7. Personal Information and Marketing

- 7.1. Hacer Group may use and share your personal information for direct marketing through various channels, such as via post, email, SMS, telephone or social media (through targeted advertisements).
- 7.2. We will only send these communications in accordance with the Privacy Act (including APP 7) and the Spam Act 2003 (Cth), and only where you have not opted out from receiving such communication from Hacer Group. At the point of information collection, Hacer Group provides individuals with a mechanism to opt-out of direct marketing to ensure that consent is not obtained through pressure or lack of choice.
- 7.3. You can opt out of direct marketing communications at any time by following the unsubscribe instructions in the relevant communication (as further described in items [6.5 to 6.8](#)), or by contacting us using the details in [Section 11 – For More Information & Support](#).**Error! Reference source not found.**
- 7.4. If you have indicated a preference for a method of communication, we will endeavour to use that method wherever practical to do so.
- 7.5. Regardless of whether you opt out from receiving any or all direct marketing communications, we will still communicate with you if required by law to provide you with information, or in relation to the products or services we are providing to you.

8. Storage and Protection of Personal Information

- 8.1. We are committed to protecting your personal information and ensuring that we securely store any personal information we collect (in accordance with applicable privacy laws).
- 8.2. We store personal information through a combination of storage arrangements, including:
 - (a) secure electronic databases;
 - (b) cloud-based systems; and
 - (c) physical records held at various Hacer Group properties, premises and building sites.
- 8.3. We may hold your personal information in hard copy (paper) or electronic form. We may also store personal information with third-party storage or hosting providers. Where we do so, we take reasonable steps to ensure those providers keep your information secure. The details of the security and storage measure in place for personal information are as follows:
 - (a) **Paper-Based Files**
 - We store archived personal information in paper-based files in secure storage and maintain physical security measures to ensure that such personal information is protected, such as physical locks on drawers and cabinets, and security systems at our



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properties, premises and building sites. Paper files may also be archived in boxes and stored offsite in secure facilities.

(b) **Building And Project Site**

- We ensure physical security on site for our building projects.

(c) **Electronic Records**

- Your personal information will be stored on databases held on servers located in a technologically secured environment, accessed only by authorised personnel or contractors (with login and password protection).
- We also maintain physical security measures in relation to storage of our electronic records (such as locks and security systems), and maintain computer and network security, by using firewalls, anti-virus software and conducting routine penetration testing of those systems.
- Hacer Group also has policies and procedures in place in relation to document storage and security.

(d) **Our Website**

- Our website uses encryption and other technologies to ensure that your personal information is securely transmitted via the internet.

9. Accessing and Amending Personal Information

- 9.1. You may request access to your personal information held by Hacer Group by contacting us using the details at [Section 11 – For More Information & Support](#).
- 9.2. You have the right to request access to, and correction of your personal information held by Hacer Group. If you believe any information, we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you may request correction using the contact details in [Section 11 – For More Information & Support](#). We will take reasonable steps to correct your information and will grant access to the extent required or authorised by law.
- 9.3. If we correct personal information about you, and we have previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask us to notify that other entity. If so, we will take reasonable steps to do so, unless this would be impracticable or unlawful.
- 9.4. Hacer Group will generally respond to your request within 30 days. We may decline your request to access or correct your personal information in certain circumstances in accordance with applicable privacy laws, however, if we do so, we will provide you with written reasons for the refusal and details of complaint mechanisms.
- 9.5. If you are dissatisfied with Hacer Group's refusal to grant access to, or correct, your personal information, you may complain to us using the contact details at [Section 11 – For More Information & Support](#).

10. Privacy Complaints and Questions

- 10.1. If you have any questions or concerns about this Privacy Policy or how we have handled your personal information, you may contact us at any time using the relevant contact details set out below in [Section 11 – For More Information & Support](#).
- 10.2. Please also contact us if you have a complaint about privacy. If you make a complaint about privacy, the following will occur:
1. We will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally acknowledge your complaint within a week.
 2. If your complaint requires more detailed consideration or investigation:
 - i. we will acknowledge receipt of your complaint and endeavour to complete our investigation into your complaint promptly; and



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- ii. we may ask you to provide further information about your complaint and the outcome you are seeking. If your initial complaint was not written, we may ask you to submit your complaint in writing.
 - 3. We will then typically gather relevant facts, locate and review relevant documents and speak with the individuals involved.
 - 4. In most cases, we will respond to your complaint within 30 days from when we received your complaint. If the matter is more complex or our investigation may take longer, we will let you know and tell you when we would expect to provide our response.
- 10.3. If you are not satisfied with our response to a complaint, or you consider that we may have breached the Privacy Act (including the APPs), you are entitled to make a complaint to the Office of the Australian Information Commissioner (the OAIC), which is the Australian privacy regulator.
- 10.4. The OAIC can be contacted by telephone on 1300 363 992, or you can fill out this form to make a complaint about our handling of your personal information. Full contact details for the OAIC can be found online at www.oaic.gov.au.

11. For More Information and Support

- 11.1. For further information or enquiries regarding your personal information, if you would like to opt-out of receiving any promotional or marketing communications, or make a privacy complaint, please contact us using any of the following details:

Email: privacy@hacer.com.au

Contact Number: +61 3 9810 6888

Postal Address: Level 2, 11 Eastern Road, South Melbourne VIC 3205