

Pensar Construction Group Pty Limited (**Pensar, we or our**) understands and appreciates that your privacy is very important to you and that you have a right to control your Personal Information. We know that providing Personal Information is an act of trust and we take that seriously. This policy explains how we will deal with your Personal Information as you interact with us.

If you apply for employment with us or seek to engage with us as an independent contractor, then our Recruitment Privacy Collection Statement will explain how we deal with your Personal Information in that context.

COLLECTING PERSONAL INFORMATION:

“Personal Information” is any 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 be reasonably ascertained, from the information or an opinion. We will collect Personal Information from you so we can provide you with products and services that you have requested or which you have enquired about. We may also collect your Personal Information to respond to your enquiries and so we can let you know about other products, services, or opportunities you might be interested in.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We may collect the following types of Personal Information:

Contact and identifying information, such as your:

- Name
- Mailing or street address
- Email address
- Telephone number
- Age or birth date

Professional information, such as your:

- Profession, occupation or job title

Website enquiries, including:

- Any information relating to you that you provide to us directly through our websites or indirectly through use of our websites

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect your Personal Information directly from you unless it is unreasonable or impracticable to do so. When collecting Personal Information from you, we may collect in ways including:

- Through your access and use of our websites
- During conversations between you and our representatives
- When you complete an application

We may also collect this information from a third party you have authorised to provide the information, or from a client or third party where it is unreasonable or impracticable to collect it from you. If you have referred us to third parties to obtain personal and other information about you, we will assume, and you must ensure, that the third party is aware that you have referred us to them and of the purposes involved in the collection, use and disclosure of your Personal Information.

If you supply us with information about another person, you should ensure you are authorised to do so. You must inform that person who we are, that we will use and disclose their Personal Information as outlined in this Privacy Policy from time to time and that they have certain rights to access the Personal Information that we hold about them.

We collect electronic Personal Information about your use of our website each time you visit it. The kinds of electronic Personal Information we collect may include:

- The date and time of visits
- Which pages are viewed
- How users navigate through the site and interact with pages (including fields completed in forms, applications completed, search items entered)

- Location information about users
- Information about the device used to visit our website.
- Internet provider details
- Referring URLs (universal locators)
- IP addresses

When you use our website, we may use cookies which are software code placed on your web browser to recognise and identify your computer. The cookies we pass to you are anonymous and do not hold information about you or reveal your personal identity.

The cookies we use monitor your use of our website to learn about your preferences so that we may improve our products and provide you with a more user-friendly experience when you visit our website.

Most Web browsers are set to accept cookies. If you prefer not to receive cookies, you can configure your Internet browser to reject them or to notify you if they are being used.

However, deleting or refusing to accept cookies may limit the functionality of our website and effect your overall experience in using our website.

WHAT HAPPENS IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION

If you do not provide us with the Personal Information described above, some or all of the following may happen:

- We may not be able to provide the requested products or services to you; or
- We may not be able to provide you with information about products and services that you may want

USING AND DISCLOSING YOUR PERSONAL INFORMATION

In line with modern business practices and to assist you with your requirements we may disclose your Personal Information to the organisations/persons described below.

- Our employees, contractors or service providers for the purposes of operation of our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation: companies involved in maintaining, reviewing and developing our business systems, and infrastructure; Organisations involved in providing, managing or administering your product or service such as third party suppliers
- Our related bodies corporate
- Those people who are your authorised legal or personal representatives
- Government or regulatory bodies as required or authorised by law, or required for the prevention, detection and investigation or remedying of seriously improper conduct that might adversely affect Pensar
- Any other company or person with your express consent
- Personal Information held by Pensar may be disclosed to, and held at, destinations outside Australia, where we utilise third party service providers to assist us with providing our products and services to you. Personal Information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.
- In addition we may utilise overseas IT services (including software, platforms and infrastructure), such as data storage facilities or other IT infrastructure. In such cases, we may own or control such overseas infrastructure, or we may have entered into contractual arrangements with third party service providers to assist us with providing our products and services to you.
- By submitting your Personal Information to us, you expressly agree and consent to the disclosure, transfer, storage or processing of your Personal Information outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to Personal Information. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

- The Privacy Act requires us to take such steps as are reasonable in the circumstances to ensure that any recipients of your Personal Information outside of Australia do not breach the privacy principles contained within the Privacy Act. By providing your consent, under the Privacy Act, we are not required to take such steps as may be reasonable in the circumstances. However, despite this, we acknowledge the importance of protecting Personal Information and have taken reasonable steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.
- If you do not agree to the disclosure of your Personal Information outside Australia by us, you should (after being informed of the cross-border disclosure) tell us that you do not consent. To do this, either elect not to submit the Personal Information to us after being reasonably informed in a collection notification or please contact us via the details set out under the “Contacting Us” heading of the Privacy Policy.
- Your Personal Information will not be shared, sold, or disclosed other than as described in our privacy documentation.

DIRECT MARKETING MATERIALS

We may send you direct marketing, communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. You may opt-out of receiving marketing communications from us by contacting us (see the details below) and we will then ensure that your name is removed from our mailing list.

PROTECTING YOUR PERSONAL INFORMATION AND KEEPING IS ACCURATE AND UP TO DATE

We store information in different ways, including in paper and electronic form. The security of your Personal Information is important to us, and we take reasonable steps to protect it from misuse and loss and unauthorised access, modification or disclosure.

We will also take reasonable steps to make sure that the Personal Information we collect, use or disclose is accurate, complete and up to date. If you believe your Personal Information is not accurate, complete, or up to date, please contact us.

Due to the nature of the products and services we provide, it is only practicable or reasonable for Pensar to transact and correspond with you on a named basis. Your Personal Information may be required in order to provide you with our products and services, or to resolve any issue you may have.

If you believe that your Personal Information is incorrect or out of date you can request to have this amended. To request access to your Personal Information you can contact us using the information in the “Contacting us” section below.

Please be aware that some information cannot be amended or deleted due to legal reasons. If we deny your request, we will inform you of the reasons for this decision.

OUR WEBSITES

Our websites have electronic security systems in place, including firewalls to control access to your Personal Information.

LINKS TO OTHER SITES

You may be able to access external websites by clicking on links we have provided. Those other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to determine what security measures they have in place.

When we have Personal Information about you, we will make every reasonable effort to make sure that the information is secure and is used or disclosed consistently with the Privacy Principles.

USING GOVERNMENT IDENTIFIERS

We will not use or disclose a government identifier (such as a tax file number) other than when required or authorised by law.

YOUR SENSITIVE INFORMATION

Sensitive information means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

We will not collect sensitive information about you unless we are required to do so by law; the information is required for an insurance claim; or the information is necessary for the establishment, exercise or defence of a legal claim.

CONTACTING US

If you have any questions about privacy, you can call our offices. Our staff will do their best to resolve your issue. If an investigation is required, the Privacy Officer will become involved in the process. We will keep you advised of progress of the investigation.

To request access to Personal Information held about you in Pensar's records, to make a privacy related complaint, to obtain more information about this Privacy Policy or to enquire about privacy matters generally, please contact Pensar using the below contact information.

Mail: 168 Robertson Street, Fortitude Valley QLD 4006

Email: policyfeedback@pensar.com.au

Telephone: 1300 083 042

Please mark your correspondence to the attention of the Privacy Officer.

RESOLVING PRIVACY COMPLAINTS

We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

In order to resolve a complaint, we:

- a. will liaise with you to identify and define the nature and cause of the complaint.
- b. may request that you provide the details of the complaint in writing.
- c. will keep you informed of the likely time within which we will respond to your complaint; and
- d. will inform you of the legislative basis (if any) of our decision in resolving such complaint.

We will keep a record of the complaint and any action taken in a Register of Complaints. If you feel that we have not adequately dealt with any privacy complaint you have made, you may contact the Office of the Privacy Commissioner (Australia).

MORE INFORMATION

For more information about privacy legislation, you can visit the web site of the Australian Information Commissioner at www.privacy.gov.au.

Date: 25th November 2024

Signed:



Managing Director