



OVERVIEW

Eptec Pty Ltd (ABN 48 080 052 259) and the Eptec group of companies listed at the end of this Privacy Policy (collectively "**Eptec**") respects the privacy of individuals and is committed to protecting the personal information it collects and holds in accordance with the Privacy Principles in the Australian *Privacy Act 1988* (Cth) and the New Zealand *Privacy Act 2020*.

SCOPE

This Privacy Policy ("**Policy**") outlines how Eptec manages the collection, use, disclosure and handling of, or otherwise processes the personal information of its customers, customers' personnel, visitors to Eptec's websites or premises, Eptec's employees and contractors and others whom deal with Eptec.

PRINCIPLES

Personal Information

In this Policy, "personal information" means any information relating to an identified or reasonably identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the person's physical, physiological, mental, economic, cultural or social identity 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.

Personal information includes "sensitive information" which consists of information or an opinion about an individual's racial or ethnic origin, political opinion, membership of a political association or trade union, religious or philosophical beliefs, sexual life, sexual orientation, health or genetic information, political or union related views or activities, the commission or alleged commission of offences and related proceedings including administrative or criminal sanctions and biometric information.

Personal Information Collection

To enable us to fulfil our responsibilities as an integrated provider of asset preservation and rehabilitation services, Eptec collects personal information about you, to enable Eptec to effectively conduct its businesses. This personal information must be sufficiently detailed for Eptec to effectively conduct its businesses.

You are not required to supply any of the personal information that we may request. However, if the personal information we request is not provided, we may not be able to provide services in the most effective or efficient manner, or at all, or you may not be able to be a service provider to Eptec.

We only collect personal information for our business purposes, as set out at "Use and Disclosure of Personal Information" below and in accordance with any applicable privacy / data protection laws.

Depending on the business purpose, the personal information we collect may include:

- General identification information such as names, job title, occupation, date of birth and gender (where reasonably required).
- Contact details such as address, email address, phone and mobile phone number and Internet Protocol (IP) address.
- Educational qualifications, employment history, salary and referee reports.
- Unique site access ID.
- Information contained in identification documents such as a passport or driver's licence.
- Government-issued identification numbers such as tax file numbers or IRD numbers (when permitted by law to collect).
- Financial information such as credit card and bank account details, as well as shareholdings.
- Details of superannuation arrangements.

- Visa or work permit status and related information.
- Information about immigration status.

We generally collect personal information directly from you in person, in writing, by telephone, email or via our websites (for example if you subscribe to our newsletter or complete an online form), or when you give us a business card (or similar).

If you apply for a job with Eptec or are an employee, we may collect, for example, your full name, contact details (including address, phone number and email address), job title, passport details, employment history and education details, names and contact details of referees, next of kin details (in the event of an emergency) and superannuation fund and Tax File Number or IRD details, if required by law. This information may be collected directly from you, recruiters or your referees.

We may also collect information from background check providers (where conducting a background check is necessary for an engagement or project).

We may also collect your personal information from you if you attend a trade show, expo or event which we have organised or which is attended by an Eptec representative.

We will only collect personal information to the extent that it is required for the specific purposes set out in this Policy or notified to you at the time of collection.

Collection of Information via our Website

When you visit one of our websites, information about your computer or device is automatically recorded by our website. This includes your IP address and associated domain name (e.g. yourcompany.com), the date and time of your visit to our site, the pages you accessed or downloaded, the address of the last site you visited, your operating system and the type of browser you used. This information may be collected by us or by a third-party service provider on our behalf. This information is collected for statistical and system administration purposes, and to improve our web-based services. It does not readily identify individuals, and we will not attempt to identify individuals from the records our server generates unless it is necessary to do so for law enforcement purposes.

We may also use “cookies” to assign your device a user ID. Please refer to our separate Cookie Standard for further information about the use of cookies. A cookie is a small piece of information that is sent to your browser and stored on your computer's hard drive. Cookies contain information that allows us to identify your device, understand your use of our websites and set your preferences for future visits. We may use this information to determine whether or not to display standard content. You can configure your browser to notify you when you receive a cookie or disable cookies altogether.

You can disable cookies through your internet browser. Please note that some of the cookies we use are essential for our websites to operate, and that, if you disable cookies altogether, you will not be able to use all parts of our website.

Use and Disclosure of Personal information

Your information will be processed fairly, lawfully and in an appropriate way.

We will only use personal information for the purpose for which it was collected or for related purposes permitted by law. These uses include (but are not limited to) those set out below.

Information you give to us. We may use this information for the following purposes:

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- As Eptec’s customer or the personnel of customers:
 - To provide you with support in relation to the services that you request from us;
 - To process transactions and send notices to you about your transactions;
 - To send administrative or account-related information to you;
 - To resolve disputes, collect fees and troubleshoot problems;

- To deliver targeted marketing, service update notices, and promotional offers based on your communication preferences (where this in accordance with the law);
- If your business wishes to be engaged as an Eptec subcontractor, to assess the credit worthiness of the business;
- If you are a job applicant, employee or contractor with Eptec, we will use your personal information for purposes relating to the assessment of your application, your engagement, training, performance management, payroll, superannuation, health and safety, for administration and staff management purposes;
- To operate, manage, develop and promote our business and, in particular, our relationship with the organisation you represent (if any) and related transactions;
- To notify you about changes to our service;
- To ensure that content from our site is presented in the most effective manner for you and for your computer or device;
- To facilitate distribution of corporate communications such as our financial results and other information that is relevant to the promotion or reporting of our business activities;
- To protect our business from fraud, money-laundering, breach of confidence, theft of proprietary materials and other financial materials and other financial or business crimes; and
- To comply with our legal and regulatory obligations and bring and defend legal claims.

Information we collect about you. We will use this information:

- To assess your suitability for employment or your engagement as a contractor;
- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer or device;
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep our site safe and secure;
- As Eptec's customer or the personnel of customers:
 - To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
 - To the extent permitted by applicable law, to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Information we receive from other sources. We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Eptec does not sell personal information that you give to us, we collect from you, or we receive from other sources.

Eptec uses personal information to provide, manage and administer the goods and services it provides.

We may, from time-to-time, review information about you held in our systems (including the contents of and other information related to your email and other communications with us) for compliance and business-protection purposes as described above. This may include reviews for the purposes of disclosure of information relevant to litigation and/or reviews of records relevant to internal or external regulatory or criminal investigations. To the extent permitted by applicable law, these reviews will be conducted in a reasonable and proportionate way and approved at an appropriate level of management. They may ultimately involve disclosure of your information to governmental agencies and litigation counterparties as described below.

Disclosures of personal information

In the normal course of our business operations, we may disclose personal information to:

- our related bodies corporate in Australia and New Zealand for the purposes of transfers or secondments of employees;
- third parties who conduct security checks for personnel to enable them to have the necessary security clearances and/or site access passes to undertake work for a related body corporate or for our clients;
- statutory entities in Australia and New Zealand which are authorised to access or receive the information;
- our external advisers, such as our lawyers, accountants and/or auditors;
- law enforcement agencies, courts or otherwise as required or authorised by law;
- selected third parties including:
 - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
 - contract service providers, including but not limited to customer service staff, consultants and advisers;
 - IT and internet service providers;
 - software providers whose software assists us in the operation of our business, which is used in connection with, for example, customer relationship management and human resources;
 - analytics and search engine providers that assist us in the improvement and optimisation of our site;
- your colleagues within the organisation that you represent (in terms of your contact details and your role);
- credit reporting bodies for the purpose of assessing your business' credit score where this is a condition of us entering into a contract with you. (Further information is available in our Statement of Notifiable Matters); and
- Another entity in exceptional circumstances:
 - to competent regulatory, prosecuting, and other governmental agencies, or litigation counterparties, in any country, State or Territory; or where we are required by law to disclose.

Most data is stored in Australia and New Zealand.

However, from time to time, personal information may be disclosed to overseas recipients. The personal information of employees, contractors and job applicants is shared with our HR cloud-based software provider which is located in the USA, Canada and the EU.

We reserve the right to transfer information (including your personal information) to a third party in the event we sell or transfer all, or a portion, of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal information you have provided to us in a manner that is consistent with the principles described in this Policy.

Direct Marketing

From time to time, we may use your personal information to provide you with information about our services, special offers you may find of interest or new services being offered by us. Direct marketing messages may be sent by email, SMS or post.

If you do not wish to receive marketing information, you can at any time opt-out by contacting our Privacy Officer using the contact details below or by using the opt-out facilities provided (such as an unsubscribe link in an email). Please note that if you opt-out, we may still send you non-promotional messages, such as transactional messages regarding payments or information about your account.

Access, Correction and Retention

We take reasonable steps to ensure that the personal information we hold is adequate, relevant, accurate, complete, and up to date. You can contact our Privacy Officer (see below) if you would like details of personal information which may be held about you. You have the right to request access to the personal information we hold about you under data protection law. You can also request any inaccurate personal information to be updated or corrected.

To ensure the integrity and safety of personal information, Eptec only discloses the personal information it holds to the individual concerned, their legally authorised representative, or to fulfil legal or regulatory requirements.

We may decline your access and/or correction request in certain circumstances in accordance with the applicable Privacy Principles. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction (if you ask us to do so).

We will keep personal information for as long as is necessary in accordance with our records management policies for the purpose or purposes for which it was collected. We will take all reasonable steps to delete from our systems, all data which is no longer required. Eptec will delete any personal information we hold about you when it is no longer required, and we are legally able to do so.

Note that we may retain some limited information about you even when we know that you have left the organisation that you represent, so that we can maintain a continuous relationship with you if and when we are in contact with you again, representing a different organisation.

Complaints

You may contact us at any time if you have any questions or concerns about this Policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to our Privacy Officer using the contact details set out below.

Our Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint.

Your complaint will then be investigated. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within a reasonable time, usually within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint:

- If you are in Australia, you may make a complaint to the Office of the Australian Information Commissioner (OAIC). The OAIC can be contacted by telephone on 1300 363 992 or by using the contact details on the website www.oaic.gov.au; or
- If you are in New Zealand, you can make a complaint to the Office of the Privacy Commissioner via the webpage <https://www.privacy.org.nz/your-rights/making-a-complaint-to-the-privacy-commissioner/>.

Storage and Security of Personal information

Personal information is principally held in electronic databases maintained within Eptec's computer network on secure servers. Eptec maintains appropriate administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential.

We ask you not to share a password with anyone. Your personal information will be processed in accordance with our data security policies. We will maintain data security by protecting the confidentiality, integrity and availability of the personal information we hold.

Use of our Websites

Our website may contain links to other websites that are not owned, operated, or endorsed by us. We are not responsible for the privacy practices of those websites, or for the content, product or services provided by, or contained on, those websites

Eptec group of companies

The Policy applies to the following Eptec companies:

Australian companies

- Eptec Holdco Pty Ltd ABN 14 638 785 387
- Eptec Bidco Pty Ltd ABN 12 638 785 378
- Eptec MBO Co Pty Ltd ABN 43 623 497 923
- Eptec Holdings Pty Ltd ABN 33 623 502 652
- Eptec Pty Ltd ABN 40 080 052 259
- Eptec Marine Pty Ltd ABN 49 118 319 547
- Eptec Services Pty Ltd ABN 30 082 596 432
- Eptec Services (QLD) Pty Ltd ABN 42 662 200 437
- Corrosion Control Engineering (Holdings) Pty Ltd ABN 41 659 204 707

New Zealand companies

- Corrosion Control Engineering (NZ) Ltd

Further Information

We may amend this Policy from time to time. Updated versions of this Policy will be placed on our website (<https://eptec.com.au/>). Where amendments to the Policy are material, we will provide you with reasonable notice of the amendments before the amendments take effect.

If you would like to gain access to or correct your personal information, or if you wish to voice your concern on any matter to do with either this Policy or use of your personal information, please contact:

Privacy Officer
Eptec Pty Ltd
Level 2, 68 Waterloo Road
Macquarie Park NSW 2113
Australia
Email: eptec@eptec.com.au

The Privacy Officer will contact you within a reasonable time after receipt of your request or complaint to discuss your concerns and to outline options regarding how they may be resolved.

General information about privacy may be found via:

- for Australia, at <http://www.oaic.gov.au/>.
- for New Zealand, at <http://privacy.org.nz>.



Geoff Knox
Managing Director