



PRIVACY NOTICE FOR PERSONNEL

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TABLE OF CONTENT

1. INTRODUCTION.....	3
2. PURPOSE AND SCOPE	3
3. COMPLIANCE GUIDE	3
4. PRINCIPLES.....	3
4.1. Where do you collect information from?	3
4.2. Why do you need my information?	4
4.3. How do you use my information?	4
4.4. Do you disclose my information to other parties?	5
4.5. Do you transfer my information overseas?	6
4.6. How long do you keep my information for?	6
4.7. What rights do I have?	6
5. REFERENCE MATRIX.....	7
5.1. Integrated Management Systems Document / Forms	7
6. PROCESS FLOW	7
6.1. Process Flow Title	7

1. INTRODUCTION

The Eptec Values are the underpinning foundation of our core beliefs and standards which guides our decisions and actions. Eptec is committed to protecting the privacy of its employees and the other individuals whose personal information comes into its possession.

2. PURPOSE AND SCOPE

Eptec Pty Ltd (ABN 48 080 052 259) and the Eptec Group of companies listed at the end of this notice (collectively "Eptec") respects the privacy of its employees' and contractors' personal information. We set out below information regarding Eptec's collection, disclosure and other use of information relating to Eptec's employees and individual contract workers. Where we refer below to "employees" we are also referring to contract workers, although the information that we collect in relation to such contractors, subcontractors and other short term contract workers, and our disclosure and other use of that information, may be somewhat more limited.

Employees should familiarise themselves with, and abide by, Eptec's policies on data protection and privacy, copies of which are available on Eptec's intranet, from your manager or from the P&C Department.

3. COMPLIANCE GUIDE

Australia: Privacy Act 1998 (Cth)

Australian Privacy Principles

New Zealand: Privacy Act 2020

Information Privacy Principles

4. PRINCIPLES

4.1. Where do you collect information from?

Eptec collects information about its employees in the course of the recruitment process and their subsequent employment with Eptec. Some of this information is collected directly from you (for example, in forms that you are asked to complete). Other information is generated automatically when you use or otherwise interact with Eptec's systems (for example, when you log in to our network or send an email which is retained in our systems); created by colleagues (for example, in the appraisal process, in the course of an internal investigation or where your role in a particular business activity is described in an internal document); or provided to us by third parties (for example, when a customer or supplier comments on your performance or we conduct background checks).

The information we collect about employees includes:

- a) Name, date of birth / age, gender, racial or ethnic origin, religion, trade union membership, marital status and related family information, business and personal contact (including emergency contact) information, photograph, Tax File Number or IRD Number (if in New Zealand) and passport number and other details;
- b) citizenship and, where relevant, residency and work permit status and other immigration-related information;
- c) relevant information regarding health and disabilities;

- d) job title, department, responsibilities, responsible line manager(s), team members for whom you are responsible and related information such as your employee ID number;
- e) employment terms and conditions, date of hire and resignation / termination (with reasons and related information), content of references obtained, employment history (with and before joining Eptec), educational history, qualifications and results of background checks and assessment results;
- f) information regarding business expenses and salary, superannuation, insurance and other benefits (including bank account details);
- g) records of working hours, sickness and other absence records, records of training and development activities and plans and of performance appraisals and records of disciplinary and grievance processes, and depending on the nature of your position with Eptec, records of your aspirations, mobility, and job competency assessments;
- h) depending on the nature of your position with Eptec, records of your role in Eptec's business, P&C, compliance and other activities;
- i) records relating to personal trading and gifts received, inside information lists and lists relating to external activities / actual or potential conflicts of interest;
- j) records relating to your access to both Eptec's physical premises (including images captured by CCTV), and information technology systems, including user profiles, account and log-in information and access rights and information as to your interactions with those systems (details of systems and websites accessed, emails and other communications sent and received (including their content; and including communications sent using personal accounts) and telephone calls made and received (including their content, when you have been notified that calls are recorded)); and
- k) Records relating to your use of Eptec company vehicles, such as information including driving speed, hours travelled, odometer readings per trip for fatigue management purposes and the vehicles location during an employee's ordinary hours of work and if travelling for work purposes outside of the ordinary hours of work.

4.2. Why do you need my information?

We need your information for our business, human resource management or compliance purposes, and that you are therefore required to provide it pursuant to your duties as an employee of Eptec. In those circumstances, or where provision of information is necessary for compliance with a legal obligation, refusal to provide information requested by Eptec could lead to disciplinary sanctions, up to and including dismissal. If you are uncertain as to Eptec's need for information that we request from you, please raise the question with the person requesting the information and your manager.

4.3. How do you use my information?

We use employee information for legitimate business, human resource management and compliance purposes and to perform our obligations under your employment contract, including:

- a) Operation of our business;
- b) Equal opportunity monitoring;
- c) Payroll operation and pension administration;
- d) Education and training;
- e) Career development (including providing references), appraisals, succession planning and performance management;
- f) Operation of employee benefits, plans and insurances;
- g) To administer and operate information technology systems and related policies and procedures;

- h) To carry out human resource and legal / regulatory compliance functions, including assessing compliance with your employment contract and related Eptec policies;
- i) To comply with client requirements, for example, if a client requires a background check to be completed for the purposes of a Site Security Access Pass or a Department of Defence Security Clearance;
- j) The management of grievances and disciplinary procedures;
- k) Business protection, including ensuring the physical security of our premises, guarding against breach of confidence / theft or infringement of intellectual property, fraud, cyber-attack, and other interference; and
- l) To assess our and our employees' compliance with law and regulation.
- m) We may from time-to-time review information about employees held in our systems – including the contents of and other information related to your email and other communications and the information generated regarding system access and use (see paragraph 4.1(j) above) – for the purposes set out in paragraphs 4.3(g) to (l) 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 as described in paragraphs 4.4.2 below. Your emails and other communications may also occasionally be accessed for ordinary business management purposes (for example, where necessary when you are out of the office or have left Eptec).

We are entitled to use, disclose, and otherwise process our employees' (and former employees') information as described in this 4.3 because we have a legitimate interest in carrying out the processing for the purposes described above at 4.2. Some of our processing may also be required so that we can comply with your employment contract or our legal obligations.

4.4. Do you disclose my information to other parties?

- 4.4.1. Depending on the nature of your position** with Eptec, certain limited employee information (your name and business contact details and relevant information about your involvement in our business) will be widely available within the Eptec group and may be disclosed to our customers, suppliers, and other business contacts, and where appropriate made publicly available, in the ordinary course of our business.
- 4.4.2. In addition, Eptec may disclose your information,** where reasonably necessary for the various purposes set out in paragraph 4.2 and 4.3, to:
 - a) Other members of the Eptec group (which may be located in Australia or New Zealand);
 - b) Eptec's accountants and auditors;
 - c) Payroll;
 - d) Providers of travel services;
 - e) Employee benefits advisers;
 - f) Expense management providers;
 - g) Credit card providers;
 - h) External legal counsel and other advisers;
 - i) Other service providers processing employee information on our behalf in the course of supporting our business and operations;

- j) Third parties responsible for Eptec's employee benefits, such as superannuation schemes, insurance, etc.;
- k) Potential future employers, when you ask us to give a reference;
- l) Third parties to whom Eptec is required to disclose information by law or regulatory requirement (including litigation counterparties); and
- m) Competent regulatory and prosecuting authorities.

4.5. Do you transfer my information overseas?

Eptec uses Bamboo, a cloud-based P&C system which contains employee and consultant personal information. Bamboo's data centres are based in the USA, EU and Canada. Payroll data is stored on Eptec's server in Australia.

4.6. How long do you keep my information for?

- 4.6.1. **We may retain information about you throughout your employment** with Eptec, although some information will be deleted in accordance with our records management policies while you remain employed with us. Some information will be retained after your employment ends – this will apply, for example, to routine business information relevant to those continuing your work; home contact information; and certain human resource related information which we retain in case we need to give a reference, you apply to work for us again or employment-related disputes arise between us.
- 4.6.2. **As a general principle, we do not retain employee information** (except in anonymised / statistical form) for longer than we need it, given the purposes for which it is held unless it is required to be retained to comply with legal obligations, such as record-keeping obligations in the *Fair Work Act 2009*. Eptec's Data Retention standards provides more specific information as to the periods after which employee information in various categories will be deleted.

4.7. What rights do I have?

- 4.7.1. **With limited exceptions, employees** (and former employees) have legal rights to be given copies of the personal information that we hold about them and to require inaccurate information to be corrected. If you wish to exercise any of these rights, or have other questions about our employee information processing or related policies, please contact our Privacy Officer at:

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

- 4.7.2. You may have the right (depending on the circumstances) to lodge a complaint about our processing of your personal information with the relevant data protection authority in the jurisdiction where you are located. General information about privacy may be found via <http://www.oaic.gov.au/> and <https://www.privacy.org.nz/>

5. EPTEC GROUP OF COMPANIES

The notice applies to the following Eptec companies:

Australian companies

- 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
- Corrosion Control Engineering (Holdings) Pty Ltd ABN 41 659 204 707

6. REFERENCE MATRIX

6.1. Integrated Management Systems Document / Forms

Title & URL	Ref #
POL-003_Privacy Policy	POL-003

7. PROCESS FLOW

7.1. Process Flow Title

Not applicable.