

Privacy Policy and Notice

Rubicor Group Limited and any of its controlled entities for the purposes of Section 50AA of the Corporations Act (**Rubicor**) are bound by the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth). This Privacy Policy details how Rubicor generally collects, holds, uses and discloses personal information and your rights in relation to the personal information that it holds about you. It contains information about how you may access the personal information about you that Rubicor holds and seek the correction of such information. It also contains information about how you may complain about a breach of the APPs and how Rubicor will deal with such a complaint.

Collecting Personal Information

The personal information Rubicor may collect about you will depend on the circumstances of collection, including whether we collect the information from you as a client, supplier, contractor or job applicant or in some other capacity. The type of personal information which Rubicor collects about an individual depends on the nature of the individual's dealings with us. We only collect personal information that is necessary or required by law so as to deliver our services, including recruitment activities, consulting, training, or for administration purposes including but not limited to, invoicing and networking.

When you request our services as a client, Rubicor typically collects the following personal information about you: your ABN and ACN, full name, street address, telephone number, email address, working visa, opinions and other information that maybe used to assist us in providing our recruitment and/or consulting services. Rubicor also collects personal information provided in resumes such as references, education, employment qualifications and competencies. In most cases, we collect personal information about an individual directly from the individual in the following ways, in person, by telephone, letter and/or via electronic means, on the completion of application forms, or when the individual requests further information about our services through our website. Information is also collected from other parties, for example, government agencies, publicly available records, service providers such as on-line searches and social media sites, parties to whom the individual refers Rubicor or from whom the individual authorises collection of data about them, to be passed to Rubicor.

Rubicor:

- may collect and hold the following kinds of personal information about contractors, service providers and suppliers: full name, job title, business contact details of company representatives with whom Rubicor deals, financial information, banking details; and
- in the context of its recruitment process for its own employees and contractors, may collect and hold the following kinds of personal information: full name, date of birth, address telephone number, and email address, marital status, financial details (including banking details), citizenship, employment references, civil, credit and criminal records, driver's licence information, education, employment history, membership of a professional or trade association, and health information, history with Rubicor (including communications between Rubicor and the individual).

Personal information will not be knowingly collected from a minor without his or her parent's consent.

Rubicor will not ask an individual to provide sensitive personal information in a place where other people can overhear. Where personal information is sensitive information, Rubicor will only collect that information where:

- It is reasonably necessary for one or more of Rubicor's work functions or activities; and
- The individual consents to the collection of the information; or
- Rubicor is required or authorised by law to collect the sensitive information

If Rubicor receives personal information that it did not solicit from an individual and if Rubicor determines that it could not have lawfully collected that information as part of its work functions or activities, then Rubicor will (if it is lawful and reasonable), notify you and if deemed necessary and lawful will destroy the information or ensure that it is de-identified.

Using and Disclosing Personal Information

Rubicor recognises the trust that individuals place in us when they give us personal information. Rubicor collects, holds, uses and discloses an individual's personal information for the purposes of providing business services to the individual. Rubicor may also use and disclose the personal information for related purposes and other purposes, including to maintain, manage and develop our relationship with the individual, so as to comply with our legal and regulatory obligations, to contract out some of our work activities to external service providers and suppliers (such as mailing houses and printing companies, IT, advertising and marketing), to assess and consider applications from prospective job applicants, contractors and service providers and for such purposes for which Rubicor may obtain consent from you from time to time. In order to deliver a service, you have requested, we may sometimes share your personal information with an affiliate (including a selected training company), its related entities (including Rubicor) and potential employers. We may also disclose your personal information to other third parties and for other purposes with your consent. That consent may be written, verbal or implied from your conduct. In some circumstances, personal information may be disclosed to third parties in jurisdictions including United States of America, United Kingdom, New Zealand, Singapore and Hong Kong.

We or our related entities may use or disclose your personal information to market our service products or third party services to you. If you do not want to receive further direct marketing or be contacted for marketing purposes by telephone, email, letter or in person, please let us know by contacting us at info@rubicor.com.au or (02) 8061 0000. Rubicor has an effective system in place to record these requests and will action your request at its earliest time.

If you do not provide the personal information we request or consent to the collection and use of your personal information for the purposes outlined in this Privacy Policy, Rubicor may not be able to assist you in providing the services outlined above.

Rubicor reserves the right to disclose an individual's personal information to a responsible person, a close relative or others with a close relationship to that individual where it is necessary to lessen or prevent a serious or imminent threat to the individual's life, health or safety, this requires your consent. Sometimes Rubicor will collect information from a publicly available source if it is unreasonable or impractical to collect the information directly from the individual (for example, checking a candidate's work history).

Keeping Information Accurate, Complete and Up to Date

While keeping in mind why the information is being collected, Rubicor takes reasonable steps to make sure that the information is accurate, complete and up-to-date at the time of collection and when used or disclosed.

Data Security

Rubicor will endeavour to take all reasonable steps to protect personal information that it holds from unauthorised access, modification, misuse, interference and loss. When electronic information is no longer required it is permanently destroyed. When any personal information supplied by you is no longer required it is placed in a locked confidential security bin and destroyed or shredded. In addition, our employees and data processors are obliged to respect the confidentiality of any personal information held by us.

Procedures are in place such as:

- maintaining physical security measures over its physical premises, and a range of computer and network security measures (such as systems access, firewalls, data encryption) over its electronic systems. Rubicor employees are required to maintain the confidentiality of any personal information held.
- Secure storage of all files after use to reduce the risk of unauthorised access to personal information.

However, Rubicor will not be held responsible for events arising from unauthorised access to your personal information.

Openness About Information Handling Practices

Rubicor has prepared and made available its Privacy Policy on request, or on our website at:

www.rubicor.com.au

Access and Correction

Personal information that is collected about you is available for access by you and correction by you at any time. Subject to any exceptions contained in the Privacy Act to the contrary, you have a right to have access to the information that we hold about you on record.

You can also request amendments to your records should you believe that they contain inaccurate information. We will allow access or make the requested changes unless there is a reason under the *Privacy Act 1988* (Cth) or other relevant law to refuse such access, if this is the case we reserve the right to refuse to make the requested changes. If we do not agree to change your record/personal information in accordance with your request, you may write a detailed a statement of the proposed requested changes and we will enclose this with your record. Further should you wish to then obtain access to your record your request should be in writing outlining in detail the information you are seeking. Please note we may recover reasonable costs associated with supplying this information to you.

Rubicor may deny access to some information as providing such access could have an unreasonable impact upon the privacy of other individuals.

Before access to personal information is granted to any individual their identity needs to be established. The individual is required to request the information in person with photographic ID or to provide personal details that can be used to identify them.

Complaints

If:

- (a) you have questions or comments about this Privacy Policy;
- (b) we have reason to deny you access to your personal information; or
- (c) you have a complaint about our information handling practices,

you can lodge a complaint with us directly by email at info@rubicor.com.au or calling (02) 8061 0000 in Australia. Rubicor will respond to complaints within a reasonable period of time. If you disagree with Rubicor's decision, you may refer the complaint to the Office of the Australian Information Commissioner by visiting www.oaic.gov.au, calling 1300 363 992 or by emailing enquiries@oaic.gov.au.

Pseudonyms

An individual may choose to deal with Rubicor under a pseudonym where lawful and practical. Where the use of a pseudonym will render Rubicor unable to provide the relevant service or reasonably conduct its business, Rubicor may require the individual to reveal their true identity.

Trans border Data Flow

Rubicor will only transfer personal information outside Australia at the request or consent of the individual and if Rubicor has reason to believe the information will be granted a similar level of protection under the *Privacy Act 1988* (Cth).