

Privacy Policy

Commitment statement

Vaughan Infrastructure is committed to protecting the privacy and confidentiality of all personal information it collects, uses, stores, and discloses in accordance with the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles (APPs)*. We recognise the importance of privacy in maintaining trust with our employees, clients, contractors, and partners and are dedicated to upholding the highest standards of data protection. The purpose of this policy is to outline how the Company collects, uses, discloses, stores and manages personal information relating to employees, subcontractors, job applicants, clients, and other individual associated with our business activities.

In this privacy policy:

- **Personal information** refers to any information or opinion about an identified individual or an individual who is identifiable. This includes information such as name, address, or other characteristics that could link them to a specific individual.
- **Sensitive information** refers to personal information that requires a higher level of protection due to its potential to inflict harm or distress on an individual if disclosed without proper authorisation. This includes information about an individual's criminal record, health information, and genetic information that is not otherwise health information.

Scope

Our policy applies to all personal information collected by Vaughan in connection with:

- Recruitment and employment processes;
- Construction project delivery and compliance;
- Subcontractor and supplier management;
- Our website or digital communications; and
- Any other lawful business or operational activity.

It applies to all workers, including employees, subcontractors, consultants, and site personnel.

Types of personal information collected

Vaughan may collect personal and sensitive information necessary to conduct our operations, including:

- Identification details (name, address, date of birth, contact information, emergency contact details);
- Employment and qualification records (résumés, licences, certifications, right-to-work evidence);
- Health and medical information (pre-employment medicals, drug and alcohol test results, fitness-for-work reports, injury, or rehabilitation information);
- Safety and training information (inductions, training and competency records, incident, or hazard reports);
- Police or security information (criminal record checks, national police checks, and security clearances as required for projects or client contracts);
- Payroll and financial details (tax file numbers, superannuation, and bank account details);
- Records of your communications and interactions with us;
- Information collected automatically when you visit our website such as your IP address, browser type, pages visited and cookies or analytics data; and
- Any other information necessary to meet legal, safety, and project compliance requirements.

How personal information is collected

Vaughan may collect personal information through a variety of lawful and fair means, including, but not limited to:

- Directly from individuals (e.g. via forms, onboarding documents, or interviews);
- From recruitment agencies, background screening providers, or referees;
- From health professionals or testing providers;
- From training and verification bodies;
- From project clients, principal contractors, or site management systems;
- Publicly available sources; and

- Automatically through company systems, forms, or secure online platforms used for compliance and reporting.

Where it is reasonable and practical to do so, Vaughan will collect information directly from the individual.

Use of personal information

Use – An organisation or agency uses personal information when it handles or manages that information within the organisation's or agency's effective control. This includes accessing, processing, analysing, storing, or otherwise dealing with personal information for the organisation or agency's operational purposes.

Vaughan uses personal information for purposes related to its lawful business operations, including:

- Recruitment, onboarding, and employment administration;
- Fitness for work and WHS compliance;
- Site and project access verification;
- Compliance with client or government project requirements;
- Payroll, superannuation, and employee benefits;
- Injury management and workers' compensation;
- Safety performance reporting and auditing;
- Provide and manage our services and website; and
- Any other lawful purpose necessary for business, safety, or legal compliance.

Disclosure of personal information

Disclosure – An organisation or agency *discloses* personal information when it makes that information accessible or visible to individuals or entities outside the organisation or agency, thereby releasing the subsequent handling of the personal information from the organisation's or agency's effective control.

Vaughan may disclose personal information to:

- Our employees, clients, subcontractors or our related companies for site access and compliance purposes;
- Business partners or affiliates in connection with joint ventures or services;
- Medical practitioners, rehabilitation providers, and insurers;
- Background screening or security clearance providers;
- Government agencies or regulators (e.g. SafeWork, Fair Work Ombudsman, Australian Taxation Office, or Services Australia);
- Third-party service providers who help us operate our business (e.g. IT support, payroll, accounts payable, marketing or analytics provider);
- Overseas third-party service providers IT, record management, and secure cloud storage providers; and
- Other third parties as required or authorised by law.

All reasonable steps are taken to ensure that any third parties receiving personal information comply with Australian privacy standards.

Disclosure of personal information to overseas recipients

Vaughan may need to provide personal information to an overseas recipient as part of our work. We use contractors to collect, transmit and store data, including providers located outside Australia.

Personal information may be sent overseas in certain circumstances, including to external service providers that assist our organisation. Vaughan complies with the APPs when disclosing personal information overseas.

Data storage and security

Vaughan takes reasonable steps to ensure all personal information is protected from misuse, interference, loss, and unauthorised access, modification, or disclosure. This includes:

- Conducting regular system audits and access reviews of key platforms
- Applying layered security measures such as strong passwords, multi-factor authentication (MFA), and encryption for data in transit and at rest
- Storing hard copy records in secure, access-controlled cabinets when required

- Restricting access to authorised personnel on a need-to-know basis
- Maintaining regular staff awareness and data protection training, with additional refresher sessions where applicable
- Utilising secure cloud-based systems that comply with Australian Privacy Principles (APPs) and ISO/IEC 27001-aligned controls.

Information is stored in secure physical and electronic systems accessible only to authorised personnel.

Access to sensitive data (e.g. medical or police records) is restricted to personnel with a legitimate business or compliance need.

Retention and destruction of information

Vaughan retains personal information only for as long as necessary to fulfil its lawful business, legal, and project-related purposes, or as required by legislation.

Retention periods may vary depending on the type of information, for example:

- Employment records are retained for at least 7 years under the Fair Work Act 2009 (Cth);
- WHS records are retained for statutory periods under relevant Work Health and Safety Regulations; and
- Workers' compensation and insurance records are retained in accordance with state and territory legislation.

When information is no longer required, the Company will take reasonable steps to securely destroy or permanently de-identify it in accordance with APP 11.2.

Access to and correction of information

Under the Privacy Act, you have the right to ask for access to personal information that we hold about you and ask that we correct that personal information. Vaughan must provide a response within 30 days.

To make an access or correction request please put your request in writing to Vaughan's Privacy Officer at privacy@vaughancivil.com.au

Withdrawing consent

You may withdraw your consent to the collection, use or disclosure of personal information at any time by providing written notice to Vaughan. However, withdrawal of consent may affect our ability to employ or engage you or to meet site access and compliance requirements.

Making a complaint to us

If a person believes we have wrongly collected or handled their personal information, they can write to Vaughan Privacy Officer at privacy@vaughancivil.com.au.

We would respond to the privacy complaint within 30 days. We are committed to a quick and fair resolution. Every complaint will be investigated, and complainants will be advised of the outcome

Making a complaint to the office of the Australian information commissioner

If a person is unsatisfied with our response, they can write to the Office of the Australian Information Commissioner (OAIC). The OAIC can investigate privacy complaints about the protection of personal information. They can also direct departments to change the way they handle personal information. If a person needs help lodging a complaint with the OAIC, they can

Office of the Australian Information Commissioner

Phone: 1300 363 992

Web: <http://www.oaic.gov.au/privacy>

Email: enquiries@oaic.gov.au

Post: GPO Box 5218 Sydney NSW 2001

Contact details

Vaughan Privacy Officer

Phone: 1300 427 614

Email: privacy@vaughancivil.com.au

Mail: Suite 2, 422 Oxford St, Bondi Junction NSW 2022

This policy will be reviewed at the earlier of a legislative update or every three years to ensure its continued effectiveness and alignment with applicable legal and regulatory requirements. The current version will available via our website.

Joe Vaughan

Managing Director

A handwritten signature in black ink, appearing to read 'Joe Vaughan', positioned above a horizontal line.