

Privacy Policy

OVERVIEW

Buildcorp Group Pty Ltd complies and operates in accordance with the provisions of the Privacy Act 1988 and the Australian Privacy Principles published by the Privacy Commissioner, a copy of which can be obtained from the Office of the Australian Information Commissioner's website at www.oaic.gov.au.

Personal information collected from you will only be used for the purposes outlined in this Policy and for which it was intended and collected. We will not disclose your personal information to any third party, except where required by law or government regulation.

SCOPE

This policy applies to all businesses within the Buildcorp Group, including:

- ▶ Buildcorp Group Pty Limited
- ▶ Euroline Pty Limited

Together these entities are referred to as 'Buildcorp' throughout this Policy.

OBJECTIVES

This policy seeks to outline:

- ▶ Inform individuals about what personal information is collected and how it is used.
- ▶ Ensure transparency around data collection, storage, processing, and sharing practices.
- ▶ Comply with legal and regulatory obligations, such as the Australian Privacy Act or GDPR.
- ▶ Protect personal information from misuse, interference, loss, unauthorised access, or disclosure.
- ▶ Outline how individuals can contact the organisation regarding privacy concerns or complaints.
- ▶ Support responsible data handling and promote trust with employees and stakeholders.
- ▶ Define procedures for managing data breaches and notifying affected individuals if required.

POLICY IN DETAIL

Purpose of information collection

We will collect personal information for the following purposes:

- ▶ To provide services or employment
- ▶ To communicate with individuals
- ▶ To meet legal or contractual obligations
- ▶ For marketing, research, or improvement of services
- ▶ To send notifications, reminders and relevant documentation

Types of information we collect

The types of personal information collected and held will vary depending on the nature of the interaction. This may include one or more of the following:

- ▼ Types of personal information (e.g. name, email, phone, address, employment details)
- ▼ Sensitive information (e.g. health, race, religion – if applicable)
- ▼ Payment information (such as credit card or bank details)
- ▼ How information is collected (e.g. online forms, phone calls, in person, cookies)
- ▼ Other personal information required to provide our services; and
- ▼ Transaction details relating to your use of our products, services or benefits.

In certain circumstances, additional personal information may be collected, including details relating to current and previous education and employment history.

Where required, and subject to applicable legal obligations, sensitive information may also be collected. This may include, but is not limited to:

- ▼ Information regarding criminal records, racial or ethnic origin, or religious beliefs;
- ▼ Health-related information, or details pertaining to health and safety matters, workplace investigations, or the work environment—provided such information is voluntarily supplied or authorised for collection from a third party.

Sensitive information will only be used in accordance with the Privacy Act 1988 (Cth) and applicable privacy laws.

At times, personal information relating to third parties may be provided. In such cases, it is the responsibility of the individual providing the information to ensure that the third party is made aware of this Privacy Policy, understands its contents, and consents to the disclosure.

While the provision of personal information is voluntary, failure to do so may result in limitations in the ability to access certain products, services, or benefits.

How Information is Used and Disclosed

Personal information is generally collected directly from individuals in a variety of ways, including:

- ▼ When information is submitted through the organisation's website;
- ▼ In person during interactions or interviews;
- ▼ During the provision of requested products, services, or benefits;
- ▼ Through other forms of engagement or communication.

Personal information may also be collected through:

- ▼ The HRIS system, which is used to manage human resources, payroll, and employee lifecycle processes;
- ▼ Related businesses and associated entities;
- ▼ Business partners;
- ▼ Third-party service providers.

Additionally, information may be obtained from external third-party sources such as market research organisations, recruitment agencies, and other relevant entities, where lawful and appropriate.

All personal information is collected and used for purposes related to business operations, service delivery, workforce management, compliance with legal obligations, or other lawful and authorised activities.

Storage of Information from Recruitment Applications

Personal information provided through recruitment applications is collected and stored as part of the hiring process. Recruitment-related information is securely stored in the HRIS system and other relevant databases and is accessible only to authorised personnel involved in recruitment and selection. Application data is retained for a period necessary to complete the recruitment process and, where applicable, to comply with legal or regulatory requirements. If an application is unsuccessful, the information may be retained for a limited period to consider the candidate for future opportunities, unless deletion is requested. Strict confidentiality is maintained, and appropriate security measures are applied to protect information throughout the recruitment lifecycle.

Direct marketing

We may use your personal information to send you direct marketing communications, including updates about:

- ▶ Our products and services;
- ▶ Offerings from our related entities;
- ▶ Promotions or services provided by third-party partners who assist us in delivering our services;
- ▶ Company news, updates, and new developments we believe may be of interest to you; and
- ▶ Invitations to events or promotional activities.

These communications may be delivered via email or other electronic means, using the contact details you have provided to us. We primarily send marketing communications through our internal mailing list, which is managed in accordance with our data protection and privacy obligations.

You can opt out of receiving direct marketing communications at any time by using the 'unsubscribe' link included in each message or by contacting The Head of Corporate Affairs. Opting out of marketing will not affect our ability to send you service related or transactional communications

Access to your personal information

Reasonable steps are taken to ensure that personal information collected, used, or disclosed is accurate, complete, and up to date. If personal details change, or if information about a third party previously provided changes, please contact the Privacy Officer (Chief People Officer) by email or at the address below.

Individuals may request access to their personal information by submitting a written request with sufficient detail to identify the data. Verification of identity may be required. Access will be provided unless an exception under the Privacy Act 1988 applies. A fee may be charged for retrieving this information, with prior notice and consent.

Requests to correct inaccurate or incomplete information can be made in writing. Reasonable steps will be taken to update the data, or reasons will be provided if correction is not possible.

Artificial Intelligence (AI)

Buildcorp may use approved AI systems to process personal information for legitimate business purposes. Any access or use of personal information by AI is conducted strictly in accordance with the Buildcorp AI Governance Policy and applicable privacy laws. Unauthorised use of non-approved AI tools with personal data is not permitted.

Cookies

Our website use cookies to track user traffic patterns and to better serve you when you revisit a website. A cookie is a small data file that a website may write to your hard drive when you visit it. A cookie file can contain information, such as a user ID which the website uses to track the pages you have visited. You can refuse all cookies by turning them off in your browser. However, full functionality for our websites requires the use of cookies.

Information is also generated whenever a page is accessed on our website that records information such as the time, date and specific page. We collect such information for statistical and maintenance purposes that enables us to continually evaluate our website performance.

The website uses cookies and similar tracking technologies to monitor user traffic patterns and improve user experience. A cookie is a small data file that may be stored on a user's device when visiting the website. Cookies can contain information such as a user ID, which helps track pages visited and enables the website to recognise users upon return visits.

Visitors can choose to refuse cookies by adjusting their browser settings; however, disabling cookies may limit the full functionality of the website.

In addition to cookies, information is automatically generated each time a page on the website is accessed. This data includes details such as the time and date of access and the specific pages

viewed. This information is collected for statistical and maintenance purposes, supporting ongoing evaluation and optimisation of website performance.

The website may also use third-party analytics tools, such as **Google Analytics**, to collect aggregated data about visitor interactions. These tools assist in understanding user behaviour, measuring site traffic, and improving content and services. Data collected through these third-party services is subject to their respective privacy policies and often uses anonymisation techniques to protect individual privacy.

MANAGEMENT CONTROLS

Information storage

Personal information is stored using a combination of electronic systems, including secure computer storage facilities, as well as paper-based files and other physical records. Reasonable measures are implemented to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. These safeguards include, but are not limited to, access controls, encryption, secure servers, and physical security protocols.

Buildcorp is committed to ensuring that all records containing personal information are securely maintained and protected against loss, unauthorised access, improper disclosure, misuse, or modification in accordance with applicable privacy laws and industry best practices.

Disclosure

Personal information collected is used solely for the purposes disclosed at the time of collection or as otherwise outlined in this Privacy Policy. Use of personal information for any other purpose will only occur with the individual's prior consent or as required or authorised by applicable law. Disclosure of personal information to third parties will be limited to those necessary for legitimate business functions, including service providers, regulatory authorities, or legal entities, and will be subject to confidentiality and security obligations.

Complaints

Any concerns or complaints regarding the management or handling of personal information will be acknowledged promptly and investigated thoroughly. Individuals may submit complaints in writing to the People & Culture Team. Outcomes and any remedial actions will be communicated in a timely manner in accordance with relevant privacy regulations.

CONTACT

If you require further information regarding Buildcorp's Privacy Policy or wish to make a complaint, you can contact Buildcorp on (02) 9565 0000 or email hr@buildcorp.com.au.

RELATED POLICIES & DOCUMENTS

- ▼ Privacy Act 1988 (Commonwealth)
- ▼ Complaints Procedure
- ▼ Ethical Business Conduct Policy
- ▼ Supplier Code of Conduct
- ▼ Employee Code of Conduct Policy
- ▼ Fair Work Act 2009 (Commonwealth)
- ▼ Human Rights and Equal Opportunity Commission Act 1986 (Commonwealth)

APPROVAL & REVIEW

| Position | Role | Date | Next Review |
|----------------------|----------|--------------|-------------|
| Chief People Officer | Owner | October 2025 | June 2026 |
| Managing Director | Approver | October 2025 | |