

## 1 COMMITMENT

The Company is committed to protecting the privacy of the personal information we receive or collect and are required to comply with the Australian Privacy Principles in the Privacy Act 1988 (the Act).

## 2 SCOPE

This Policy covers all Workers and other Persons in the workplace in line with the requirements of the Privacy Act 1988 (the Act).

This policy does not form part of the employment contract between the Company and any employee. Nothing in this policy limits any of our other obligations or rights at law.

This policy operates in conjunction with other relevant Company policies as well as the applicable Awards and relevant legislation.

This policy may be used in conjunction with other Company documentation and policies.

Further details on Privacy Legislation can be obtained from the HR Department or [www.comlaw.gov.au](http://www.comlaw.gov.au). Further details on Australian Privacy Principles can be obtained from the HR Department or <https://www.oaic.gov.au>.

## 3 POLICY

### 3.1 KIND OF INFORMATION COLLECTED

The information that we hold may include your name, current and previous addresses, phone numbers, email addresses, bank details, superannuation fund details, tax file number, Closed-Circuit Television (CCTV) and other information that we need to perform our services for you.

### 3.2 COLLECTING INFORMATION

We may collect information:

- From information supplied by you.
- In conversation and communication with you.
- From third parties, including other Workers, government agencies or your representatives.
- From publicly available sources of information.
- Via CCTV footage when necessary.
- When we are required to do so by law.

If we collect a Person's personal information from someone other than the Person, we will take reasonable steps to notify the Person or ensure that they are aware that we have collected the information and the circumstances in which the information was collected.

Tampering with CCTV cameras to prevent them from functioning in the manner they were designed to do, will be considered a breach of the policy, and may result in disciplinary action in line with Award/Contract which could include counselling, written warning(s) or termination of employment/contract.



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### 3.3 INFORMATION COLLECTION METHODS

Information is collected from employees in various ways which include, but are not limited to, HR Forms, Payroll Forms, Time and Attendance Records, Surveys, Training documents, Licences and WHS Documents and CCTV footage.

### 3.4 HOW INFORMATION IS STORED

All personal information collected is treated as confidential and is only able to be accessed by authorised staff and service providers having a business reason to do so. Information may be stored in paper and electronic formats.

### 3.5 THE PURPOSES OF COLLECTION

We collect personal information for several purposes including:

- To perform our services for you.
- To provide technology services and solutions.
- To respond to requests.
- For administrative purposes.
- For recruitment purposes.
- For purposes related to employment.
- For the engagement of service providers, contractors or suppliers relating to the operation of our business.
- In the event of an accident or incident where visual footage will assist as part of the investigative process.
- To continue to provide and maintain standards of safety for employees and people on-site.

### 3.6 CLOSED-CIRCUIT TELEVISION (CCTV)

In addition to on-site security measures, BMI Group utilises Closed-Circuit Television (CCTV) for the purpose of safety and protection for employees. BMI Group CCTV coverage includes the use of both Static and PTZ cameras. The CCTV systems are standard across all sites and cover the activities managed by BMI Group.



### 3.7 RETENTION AND ACCESS OF CCTV

CCTV footage is stored and accessed when an accident or incident is reported. BMI Group retains the CCTV footage for up to 90 days and access is limited to authorised staff and service providers having a business reason to do so.

In the event of an accident or incident, CCTV footage may be reviewed to ascertain how the accident or incident occurred with the intention to prevent or mitigate the potential of future risk to persons. CCTV may also assist in identifying other prospective safety related issues, may be used to recover data for business transactional review and may be used to review customer behaviour if there is a safety concern for an employee.

Under BMI Group control, CCTV is used in:

- Company vehicles
- Plant
- Equipment
- In and around certain buildings
- Other outdoor areas on-site

### 3.8 HOW INFORMATION IS STORED

All personal information collected is treated as confidential and is only able to be accessed by authorised staff and service providers having a business reason to do so. Information may be stored in paper and electronic formats. CCTV footage is stored and handled in accordance Australian Privacy Principles (APPs)

### 3.9 SENSITIVE INFORMATION

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, sexual orientation or practices, criminal record or health or genetic information, some aspects of biometric information.

Sensitive information will be used by the Company only:

- For the primary purpose for which it was obtained.
- For a secondary purpose that is directly related to the primary purpose.
- With your consent, or where required or authorised by law.

### 3.10 SECURITY OF PERSONAL INFORMATION

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification, or disclosure. When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in individual files which will be kept securely by us for a minimum of 7 years. CCTV footage is retained for up to 90 days. Recorded footage or images of an incident may be kept on file for up to 7 years.





### 3.11 PROCESSING PERSONAL INFORMATION

Your personal information may be updated into our head office computer records via an offshore processing facility, and we will take all reasonable steps to guard the privacy of your records as set out in the Australian Privacy Principles which can be viewed at <https://www.oaic.gov.au/>

### 3.12 GAINING ACCESS TO PERSONAL INFORMATION

Requests for details of, or corrections to, personal information held can be made by writing to the HR Department and are subject to some limited exceptions permitted or required by law. The factors that affect your right to access your personal information include whether:

- It is a frivolous or vexatious request.
- The information relates to a commercially sensitive decision-making process.
- Access would be unlawful.

### 3.13 COMPLAINTS

If you have a complaint about how we collect, store or use your personal information, you may write to the HR Department at [Human.resources@bmigroup.com.au](mailto:Human.resources@bmigroup.com.au) outlining your concerns and we will respond to your complaint. If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner.

### 3.14 COOKIES ON OUR WEBSITE

Most internet browsers are set to accept cookies which are small text files placed on your computer when you first visit a website.

If you visit our website, we may collect statistical data from your visit. We will use this information to make our site more useful and attractive to you and others.

Our website is not intentionally designed for or directed at children under the age of 13 and it is our policy to never knowingly collect or maintain information about anyone under the age of 13.

You can adjust your internet browser to reject cookies, or to notify you when they are being used.

### 3.15 MONITORING ELECTRONIC TRAFFIC

Company telephones, record keeping, processing and communication systems, along with any associated hardware are supplied to employees to assist them to undertake their job duties. These systems, which include but are not limited to email (both inwards and outwards) and internet sites visited, may be monitored, tracked, and recorded by the company.



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## 4 UNSOLICITED INFORMATION

If we receive unsolicited personal information which is not reasonably necessary for, or directly related to our business functions, the information will as soon as practicable be destroyed or de-identified so that it is no longer personal information (if lawful and reasonable to do so).

## 5 DISCIPLINARY ACTION

Any employee who fails to follow this policy may be subject to disciplinary action in line with Award/Contract which could include counselling, written warning(s) or termination of employment/contract.

## 6 AUTHORITIES

This Policy has been authorised by the Directors and Senior Leadership Team  
Approved By:

  
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Nick Badyk  
CHIEF OPERATING OFFICER

  
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Date:

