Privacy Policy

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, including through our website located at https://siggroup.com.au/ (**Site**).

This Privacy Policy relates to:

- SIG Development Group Pty Ltd ABN 86 633 812 629;
- SIG Development Management Pty Ltd ABN 51 636 092 638; and
- SIG Group Management Pty Ltd ABN 43 637 036 689,

and each of their related entities (collectively, the SIG Group and referred to in this Privacy Policy as "**we**", "**us**", "**our**", "the **Group**").

This Privacy Policy outlines how we collect, use, disclose and protect your personal information, as required by the *Privacy Act 1988* (Cth) (**Privacy Act**). It also outlines how you can access and change your information, ask a question or make a complaint.

We may, in connection with particular products or services we offer or provide to you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in this Privacy Policy. In the event of any inconsistency between the provisions of this Privacy Policy and those other disclosures, the other disclosures will apply. Where applicable privacy laws provide for exceptions or exemptions, we may rely on those exceptions or exemptions in our information handling practices.

This Privacy Policy (other than section 13) explains how we manage personal information relating to individuals other than employees. Section 13 explains the position of employees.

Key definitions

In this Privacy Policy:

- **APPs** means the Australian Privacy Principles set out in the Privacy Act;
- **personal information** has the meaning given in the Privacy Act, and in summary means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not;
- **Privacy Act** means the *Privacy Act 1988* (Cth); and
- **sensitive information** has the meaning given in the Privacy Act, and includes certain specific types of personal information such as health information, and information about a person's racial or ethnic origin, sexual orientation or practices, criminal record, religious beliefs or affiliations, political opinions, membership of a political, professional or trade association, and biometric and genetic information.

1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way.

Some of the common ways in which we may receive personal information directly from you include:

- when you make an enquiry in relation to our products and services, including through our Site;
- when you enter into contracts with us for our services;
- in administering and performing any contracts with our service providers;
- from correspondence (whether in writing or electronically) or when you contact us via telephone, e-mail, social media platforms or other means;
- when you upload content to, or interact in an identifiable manner with, our Site or our social media pages;
- through any of our mobile applications;
- while conducting customer satisfaction and market research surveys;
- if you apply for a role with us;
- if you attend any of our premises, where we may record certain contact details so that we can comply with applicable laws;
- when administering any of our services; and
- as otherwise required to manage our business or comply with applicable law.

Where it is reasonably practical to do so, we will collect your personal information directly from you. However, in certain cases we may collect personal information from publicly available sources and third parties, such as suppliers, business partners, referees and government bodies.

If we collect personal information about you from a third party, we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to, correct and update the information.

2. Types of personal information we collect

The types of personal information we may collect about you include:

- Your name;
- Your contact details, including email address, mailing address, street address and/or telephone number;
- Your marital status and/or anniversary;
- Your age and/or date of birth;
- Your demographic information, such as postcode;
- Your preferences and/or opinions;
- Information you provide to us through customer surveys;
- Your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- Information about your access and use of our Site, including through the use of Internet cookies, your communications with our Site, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider. Please see the cookies and web beacons section below for further details;
- Additional personal information that you provide to us, directly or indirectly, through your use of our Site, associated applications, associated social media platforms and/or accounts from which you permit us to collect information;
- If you enter into contracts with us, request or receive products or services from us, or have other commercial dealings with us, your signature, credit card and/or banking details, and billing information;
- If you are an individual contractor to us or apply for a role with us, we may also collect information relevant to your engagement with us including qualifications, length of engagement,

resume, current and former employment details, visa or work entitlement information, pay rate and salary, bank details, emergency contact details, feedback from supervisors, training records and logs of your usage of our equipment (e.g. phones, computers and vehicles);
- If we need to confirm your identity, a copy of appropriate identification;
- If you call us by telephone, we may monitor and, in some cases, record and transcribe such telephone conversations for staff training, quality assurance and record-keeping purposes;
- If you attend any premises we operate or manage, certain contact details you provide to us (including via digital check-in), the date and time of your attendance, and your image and/or voice captured through any CCTV systems operating at those premises, for security and health and safety purposes; and
- any other personal information requested by us and/or provided by you or a third party.

We may collect these types of personal information directly from you or from third parties.

We only collect sensitive information about you with your consent, or otherwise in accordance with the Privacy Act. The main types of sensitive information we may collect include:

- details of injuries (i.e. health information) that may occur on our premises or arising through the use of our services;
- details of disabilities or allergies (i.e. health information) you notify us of so we can accommodate any special requirements when you attend our premises;
- criminal record details, as part of pre-employment checks we undertake.

If you do provide sensitive information to us for any reason (for example, if you provide us with information about a health condition, injury or disability you have), you consent to us collecting that information and to us using and disclosing that information for the purpose for which you disclosed it to us and as permitted by the Privacy Act and other relevant laws.

In addition to the types of personal information identified above, we may collect personal information as otherwise permitted or required by law.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested products, services and/or certain functionality of our Site.

3. Our purposes for handling your personal information

As a general rule, we only handle personal information for purposes that are relevant and reasonable in the circumstances. The purposes for which we use and disclose your personal information depend on the circumstances in which we collect it. Whenever practical, we endeavour to inform you why we are collecting your personal information, how we intend to use it and to whom we intend to disclose it, at the time we collect it.

We may use or disclose your personal information:

- for the purposes for which we collected it (and related purposes that would be reasonably expected by you);
- for other purposes to which you have consented; and
- as otherwise authorised or required by law.

Some of the specific purposes for which we collect, hold, use and disclose personal information include:

- to provide you with our products and services;

- to receive services from our suppliers and service providers;
- to consider you for a job (whether as an employee or contractor) or other engagement with us and to manage that engagement;
- to operate, monitor, develop and improve our Site, mobile applications and our products and services;
- to confirm your identity;
- to optimise and customise the user experience (including content and advertising) for users of our Site and mobile applications ;
- to facilitate communications via our Site, mobile applications and our social media platforms;
- to facilitate your entry and participation in a competition or trade promotion that we run;
- to protect the security and integrity of our Site, mobile applications and services;
- to contact you (directly or through our service providers and marketing research agencies) to obtain your feedback and to find out your level of satisfaction with our products and services;
- to comply with our legal and regulatory obligations;
- to protect the security, health and safety of our premises, facilities, personnel and visitors;
- to address any issues or complaints that we or you have regarding our relationship; and
- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

4. Disclosure of personal information

We may disclose personal information to:

- Third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, web hosting and server providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers and payment systems operators;
- Our employees, contractors and/or related entities;
- Our existing or potential agents or business partners;
- Our accountants, insurers, lawyers, auditors and other professional advisers;
- Any third parties to whom you have directed or permitted us to disclose your personal information (for example, referees);
- Sponsors or promoters of any competition we run;
- Anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred, and their professional advisers;
- Credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- Courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- Third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you; and
- Third parties to collect and process data, such as Google Analytics or other relevant businesses.

If we disclose your personal information to a third party who handles it on our behalf, we generally require that third party to protect your information to the same extent that we do.

We may also disclose your personal information in accordance with any consent you give or where disclosure is authorised, compelled or permitted by law.

5. Storage and security

We are committed to ensuring that the personal information we collect is secure. We hold personal information as secure physical records, electronically on our systems, in cloud storage, and in some cases on third party servers, which may be located overseas. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law. We may need to retain records containing personal information to comply with record-keeping obligations, and for other legitimate business purposes (such as quality assurance).

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

6. Our marketing and advertising activities

Overview

Like most businesses, marketing and advertising is important to our continued success. We therefore like to stay in touch with customers and let them know about new offers and opportunities.

We may provide you with information and advertisements about products, services and promotions either from us, or from third parties which may be of interest to you, where:

- you have asked us to (or have otherwise consented to us doing so); or
- it is otherwise permitted by law.

Direct marketing

We conduct direct marketing through various channels, including over the phone and by e-mail, SMS and post.

If you would like us to stop sending you direct marketing communications, you can request this by contacting us (see section 15 below).

Please note that there are certain types of communications that you may not be able to opt-out from, such as communications that we are required or permitted by law to send you.

E-mail analytics

Like many organisations, we use e-mail analytics to track and measure the success of our e-mail newsletters and other e-mail campaigns.

We use various technologies (such as tracking pixels) to collect information such as: which of our emails you have opened, which links you have clicked, which email client you are using, whether you opened our

e-mail on a computer or mobile device, and the geolocation of your IP address. We use this data to analyse and improve the performance of our e-mail campaigns.

Online targeted advertising

We may also collect and use information about you for the purposes of online targeted advertising services that help our ads to reach you (and other people who may be interested in our products and services) on websites, apps and social media platforms across the Internet. These online targeted advertising services are operated by third party vendors, such as Facebook, Instagram, Google and LinkedIn.

Some of these services work by using non-identifying data about your behaviour and demographics that has been collected through cookies and other tracking technologies (such as pixels and device identifiers) when you use the Internet, including when you move between different websites and apps and use different devices. For example, third-party vendors may use cookies and/or device identifiers to serve ads based on your past visits to our websites.

Your browser or device may provide you with the option to disable or opt-out of some of these cookies and other tracking technologies (such as device identifiers).

Other services require us to use limited amounts of your personal information. For example, we may include your information in a customer list that we provide to selected online advertising service providers so that we can conduct audience-based advertising. This allows us to show our ads to you (if you also use those platforms) and to other users of those platforms who share similar characteristics with you. The customer list is usually hashed (to improve security and confidentiality) before it's processed by the service provider to target and serve our ads.

The data that is collected through these cookies and other tracking technologies, or provided by us, may be combined with other data (supplied by our advertising service provider, or third parties) to improve the targeting and serving of ads.

Our online advertising service providers also help us by measuring the effectiveness of our ad campaigns (e.g. conversion tracking) and providing us with analytics data that we use to inform and optimise our ad campaigns. These analytics are based on data that may be collected through cookies and other tracking technologies. The analytics data we receive is generally aggregated and non-identifying.

Your choices in relation to Internet Advertising

When we use any advertising service that requires us to use or disclose your personal information, we will only do so if we are permitted to do so by applicable privacy laws. You can notify us at any time if you would like us to stop using your personal information for these targeted advertising purposes. Our contact details are set out in section 15 of this Privacy Policy.

You can also:

- Opt-out of certain online targeted advertising networks directly by visiting:
    - the Digital Advertising Alliance's opt-out portal at: http://optout.aboutads.info/; and
    - the Network Advertising Initiative's opt-out page: http://www.networkadvertising.org/managing/opt_out.asp
- view the relevant social media platform's website to learn more about how they collect and use your information and adjust your preferences regarding the types of advertising you are shown;
- prevent Google from collecting and using your data by downloading and installing the Google Analytics Opt-out Browser Add-on.

7. Cookies and web beacons

We may use cookies on our Site from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our Site with personal information, this information may be linked to the data stored in the cookie. We also use cookies as part of our online targeted advertising activities (see section 6 above).

If you do not wish to receive cookies, you can set your web browser or mobile device so that your browser or device does not accept them. Most web browsers have features that allow you to manage and control the use of cookies by the sites that you visit (including ours), and to see and delete cookies stored on your device and to block cookies from all or selected sites. For information on cookie settings of your internet browser, please refer to your browser's manual.

We may use web beacons on our Site from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

8. Links to other websites

Our Site may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

9. Social media platforms

We use social media platforms such as Facebook, Instagram and LinkedIn to communicate with the public about our products, services and business. We may collect the information that you choose to share with us through these platforms, including photos, videos, comments and posts.

These social media platforms have their own privacy policies, and may handle your information for their own purposes. You can access the privacy policies for Facebook, Instagram and LinkedIn on their respective websites.

If you choose to use these social media platforms to communicate with us, please be mindful that certain pages within these platforms may be publicly available. You should use discretion in deciding what information you upload to such platforms. We encourage you to use the privacy settings available on each platform. If you would like to contact us directly, you can do so using the contact details in section 15 below.

10. Accessing and correcting your personal information

You may contact our Privacy Officer (see section 15 below) to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions

when we refuse access (which we will only do in accordance with applicable laws), we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you our reasonable costs incurred for providing you with access to your personal information (for example, staff costs of locating and collating information or copying costs) and will provide you with details of those costs before actioning any access request.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

11. Overseas disclosure of personal information

Some of the third parties to whom we disclose personal information may be located outside Australia. In the ordinary course of business, we typically disclose personal information to recipients located in the Philippines and China.

From time to time we may also engage an overseas recipient to provide services to us, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider.

Whenever we transfer your personal information outside of Australia, we will do so in accordance with the requirements of applicable privacy and data protection laws. We may disclose your personal information to an overseas recipient without your consent where permitted by the Privacy Act (and, in such circumstances, we will comply with the applicable requirements of the Privacy Act in doing so).

12. Automated decision making

We do not currently use automated decision making tools with personal information to make decisions that will significantly affect the rights or interests of individuals.

13. Employees

We collect personal information about our employees as part of their job application and during the course of their employment, either from the employee directly or, in some cases, from third parties such as recruitment agencies, referees, government bodies (e.g. police checks, if required) and academic and professional bodies (e.g. to validate details and currency of qualifications).

The information we collect may include contact details, qualifications, resume, current and former employment details, pay rate and salary, bank details, visa or work entitlement information, emergency contact details, feedback from supervisors and training records.

We may also collect details of disabilities, allergies and health issues that may impact an employee's role, or which arise while on our premises or in the performance of the employee's duties, so we can accommodate and otherwise assist the employee with any such health requirements or incidents.

We collect camera/video footage of employees while on our premises (via CCTV) and logs of an employee's usage of our equipment (e.g. phones, computers and vehicles) on a continuous and ongoing basis using various technologies, including monitoring:

- email, internet and network use; and
- the location of our vehicles and equipment via GPS.

Under the Privacy Act, personal information about a current or former employee may be held, used or disclosed in any way that is directly connected to the employment relationship. We handle employee information in accordance with legal requirements and our applicable policies in force from time to time.

14. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy or how we handle your personal information, including if you believe we have breached the APPs, please contact our Privacy Officer (see section 15 below), providing as much detail as possible in relation to your question, concern or complaint.

We take all complaints seriously and will respond to your complaint in accordance with any applicable timeframes imposed by law and otherwise within a reasonable period. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner
GPO Box 5288, Sydney NSW 2001
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

15. Contact details

The contact details for our Privacy Officer are as follows:

Postal address: Attention Privacy Officer, Level 9 / 5 Queens Rd, Melbourne VIC 3004
Telephone: (03) 9958 6999Email: Admin@siggroup.com.au

16. Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our Site. We recommend you check our Site regularly to ensure you are aware of our current Privacy Policy.

Last updated: November 2026