

## PRIVACY POLICY

### 1. Purpose

Scotford Fennessy is committed to protecting the privacy, confidentiality and security of personal information collected in the course of its recruitment, labour hire and consulting activities.

### 2. Scope

This policy applies to employees, candidates, contractors, labour hire workers, clients, suppliers and other individuals whose personal information is collected or processed by Scotford Fennessy.

### 3. Legislative Framework

This policy supports compliance with the Privacy Act 1988 (Cth), Australian Privacy Principles (APPs), Notifiable Data Breaches Scheme and other applicable privacy laws.

### 4. Collection of Personal Information

Personal information may include contact details, employment history, qualifications, licences, tickets, work rights information, payroll information, reference information, medical information where required and other information reasonably necessary to provide recruitment and labour hire services.

### 5. Methods of Collection

Information may be collected directly from individuals, through applications, resumes, interviews, onboarding processes, reference checks, clients, government agencies and other lawful sources.

### 6. Use of Personal Information

Personal information is used to assess suitability for employment, facilitate placements, undertake payroll and HR administration, meet legal obligations and deliver recruitment and labour hire services.

### 7. Disclosure of Personal Information

Information may be disclosed to clients, host employers, payroll providers, insurers, medical practitioners, training providers, regulatory authorities and service providers where reasonably required and permitted by law.

### 8. Overseas Disclosure

Where personal information is disclosed overseas, Scotford Fennessy will take reasonable steps to ensure appropriate protections are in place and that disclosure complies with the Privacy Act and Australian Privacy Principles.

### 9. Candidate and Recruitment Information

Candidate resumes, interview notes, assessment information, reference checks and application records will be handled confidentially and only disclosed for legitimate recruitment purposes.

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## 10. Data Security

Scotford Fennessy implements reasonable safeguards including secure cloud platforms, role-based access controls, password protection, multi-factor authentication, secure storage and appropriate document destruction processes.

## 11. Artificial Intelligence and Technology

Personal information must not be uploaded to public artificial intelligence platforms unless privacy obligations, security requirements and business approvals have been satisfied.

## 12. Data Retention and Disposal

Information will be retained only for as long as required for business, legal or contractual purposes and then securely destroyed or de-identified.

## 13. Access and Correction

Individuals may request access to, or correction of, their personal information subject to applicable legal restrictions.

## 14. Privacy Complaints

Privacy concerns or complaints may be directed to the Company Privacy Officer. Complaints will be investigated and responded to in a timely manner.

## 15. Data Breaches

Any suspected privacy breach, unauthorised access, disclosure or loss of personal information must be reported immediately. Scotford Fennessy will assess, investigate and manage breaches in accordance with the Notifiable Data Breaches Scheme.

## 16. Privacy Officer

The General Manager – Operations or nominated delegate will act as Privacy Officer and oversee privacy compliance, complaints and breach management.

## 17. Review and Governance

This policy will be reviewed every two years or sooner where legislative or operational changes occur.

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