



PRIVACY STATEMENT

Kinatico Ltd ('Kinatico'), ABN 25 111 728 842 ("we", "our"), is covered by the Australian Privacy Principles (APPs), as set out in the Privacy Act 1988 (as amended by the Privacy Amendment (Private Sector) Act 2000, the Privacy Amendment (Notifiable Data Breaches) Act 2017) and the General Data Protection Regulation (EU)(**GDPR**)(if applicable). To comply with our obligations under the APPs, this Statement sets out how privacy is managed in our organisation and in particular, in Web Sites owned and operated by us.

This Statement explains how we manage the personal information that we collect, use and disclose and how to contact us if you have any queries.

INFORMATION COLLECTION AND USE

Information on Authorised Users

Kinatico owns and manages the ENABLE website using the domain name www.enablevalidate.com.au, Enable software, modules and databases, and related documentation ("ENABLE System").

The ENABLE – ERMS System module is used by Kinatico clients ("Project Owner/s") to manage workforce policies, procedures and logistics on their Project Sites. The Project Owner nominates persons ("Authorised Users") whom they wish to be given access to use the ENABLE – ERMS System. Authorised users may be from the Project Owner company and from companies to whom the Project Owner has let contracts.

Authorised Users are given a unique user name and password to be used in accordance with "Terms and Conditions of Use of the ENABLE Website". Only Authorised Users are given access to www.enablevalidate.com.au. It is not a public web site.

Information collected by Kinatico on Authorised Users includes:

- Name and contact details of the Authorised User as provided on specific ENABLE – ERMS System forms completed by the Authorised User or their employer;
- The time and date of each time the Authorised User logs in and logs out of the ENABLE -ERMS System;
- A record of each time the Authorised User updates, inserts or deletes any record on the ENABLE – ERMS System.

The above access and activity information is used to carry out effective administration and security management of the ENABLE system. Where required, it may be used to provide feedback to the relevant Project Owner on Authorised User activity. It may also be disclosed to a third party engaged by Kinatico for the purpose of system and network security, management and maintenance.

The ENABLE System does not use cookies to track any information on Authorised Users.

Information on Applicants

Authorised Users may submit information to the ENABLE – ERMS system on individuals they are seeking to mobilise to a Project Site ("Applicant/s"). The information submitted is a subset of the information provided by the Applicant on a Registration of Interest (ROI) form, as prescribed in the ENABLE – ERMS System for the relevant Project.

Applicant information held on the ENABLE – ERMS System includes:

- Name of the Contract company seeking to mobilise the Applicant;
- Name of the Project Owner and Project Site to which the Contract company is



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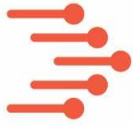
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seeking to mobilise the Applicant;

- Position to which the Contract company is seeking to mobilise the Applicant;
- Name, date of birth, address, telephone contacts, and occupation of the Applicant;
- The Applicant's driver's licence information (where supplied) indication of eligibility to work in Australia;
- Persons nominated by the Applicant to contact in the event of an emergency whilst engaged on the Project site;
- Information supplied by the Applicant to assess their suitability for the position they are seeking. This may vary between Projects but typically includes: occupations sought; education and other relevant qualifications; project experience; employment history; workers' compensation history; indication of willingness to participate in fitness for work programs on projects; name, company name and contact details of work history referees.

Instructions on the ROI form advise the Applicant of the primary and secondary purposes of collecting the information, how to obtain a copy, correct or update their information. The primary purpose of collecting information is for considering the Applicant's suitability for employment in connection with the nominated position sought on the Project Owner's Site (as identified on the ROI form) and for managing matters relating to the Applicant's employment in connection with the Project. The secondary purpose of collecting the information is for considering the Applicant's suitability for employment opportunities in connection with other construction projects that may arise in the future.

Each Applicant completing an ROI must sign the form to acknowledge their consent to their personal information being collected and used for the purposes defined on the form. It is a compulsory condition of use set by Kinatico that Project Owners and their contracting companies retain a signed copy of the ROI form on their personnel files to verify the Applicant's consent to the collection and use of their personal information. Consent will be effective if it is freely given, specific, informed and clearly indicated by affirmation action.



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Additional personal information on the Applicant held in the ENABLE – ERMS System includes information regarding the management of the Applicant’s ROI and employment on projects. This may include confirmation of the individual’s suitability for the position, and records relating to each time they are mobilised and demobilised to a Project Owner’s Site.

ACCESS AND CORRECTION OF PERSONAL INFORMATION

Authorised Users and Applicant’s can request a copy of their personal information held on the ENABLE – ERMS System by contacting us at: support@brighttechnologies.com.au. It is important to us that the personal information we hold is accurate, complete and up to date. If an Authorised User or Applicant believes that this is not case and would like their personal information corrected or deleted, they may contact us at: support@brighttechnologies.com.au.

For privacy and security purposes, we may ask that a request be put in writing along with specified information to verify the requestor’s identity.

If your data is covered by the GDPR we will uphold your right to erasure (article 17, GDPR), your right to data portability (article 20, GDPR) and the right to object (article 21, GDPR).

CONFIDENTIALITY

Information held on Authorised Users is available to the Project Owner/s that requested the Authorised User’s access to the ENABLE – ERMS System.

Information held on Applicant’s submitted to the ENABLE – ERMS System is available to the Authorised User who submitted the data and other Authorised Users of the same company. The Worker’s information is also available to the Project Owner of the Project Site for which the Authorised User submitted the Applicant’s information.

Information held on Applicants may be made available to approved third party suppliers engaged by Kinatico. Such parties are typically engaged for the purposes of assessing suitability for employment on Project Owner’s sites; providing software development and maintenance services; hardware and network security and support. Kinatico enters into formal Confidentiality Agreements requiring third party suppliers to agree not to disclose any person’s information to any other party, other than information supplied by the individual for the express purpose of the disclosure.

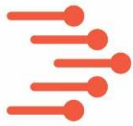
Other than authorised use by Kinatico staff, Authorised Users, Project Owners and approved third parties as described above, information held on the ENABLE – ERMS System is kept strictly confidential.

HOW WE HANDLE EMAIL

We will preserve the content of any e-mail we receive, if we believe that we have a legal requirement to do so. The content of e-mail messages may be monitored and viewed by our employees and approved third parties for the purpose of responding to requests for assistance and quality of service.

SECURITY OF INFORMATION

Kinatico takes reasonable steps to preserve the security of personal information in accordance with this Security and Privacy Statement. The ENABLE – ERMS web site using the domain name www.enablevalidate.com.au is a secure website using 128 bit Secure Socket Layer (TLS1.2) encryption. The ENABLE web sites are configured such that they



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can only be used via a secure encrypted channel (https).

Kinatico regularly reviews developments in security and encryption technologies. Unfortunately, no data transmission over the Internet can be guaranteed as totally secure. Accordingly, although we strive to protect such information, we cannot ensure or warrant the security of any information transmitted to us or from our on-line systems or services and Authorised Users do so at their own risk. Once we receive a transmission from an Authorised User, we take reasonable steps to preserve the security of the information in our own systems.

Where Kinatico authorizes access by a third party to information collected in the ENABLE – ERMS System or any other web sites or systems that Kinatico owns or manages, such access shall only be granted where the third party has signed a confidentiality agreement with Kinatico.

NOTIFIABLE DATA BREACHES

In the event of a serious data breach involving personal information that is likely to result in serious risk of harm to Authorised Users or Applicants, we will promptly contain the breach and take remedial action including, where appropriate, an assessment of the suspected data breach. Where an eligible data breach has been identified we will,

- a) notify all Authorised Users and Applicants of the breach; or if that is not practicable
- b) notify only the individual Authorised Users or Applicants whose personal information is at risk of serious harm (together, **Notified Users**).

We will provide Notified Users the details of the data breach, the kinds of information concerned in the data breach, the best way to contact us and our recommended steps in response to the data breach.

As soon as practicable after we become aware of the breach we will report a statement of the breach to the Office of the Australian Information Commissioner through the online platform.

If we deem (a) or (b) above not practicable, we will publish a copy of the statement prepared for the Office of the Australian Information Commissioner on our website.

If the breach involves data covered under the GDPR we will advise the controller who will advise the relevant supervisory authority of a data breach within 72 hours of becoming aware of the breach (otherwise a written explanation will accompany the notice) unless the risk is unlikely to be a high risk to rights and freedoms of individuals. The effected individual will also be notified as soon as possible after the incident.

ACCOUNTABILITY AND GOVERNANCE

We undertake to implement appropriate technical and organisational measures to ensure processing complies with the relevant considerations of the GDPR and the APP 1.2. We will consider and integrate data protection into these processing activities where appropriate. We will undertake a data protection impact assessment prior to data processing if the processing is likely to result in a high risk for the rights and freedoms of individuals. All records of processing activities will be kept.

STORAGE

We will take all reasonable steps to protect the security of the personal information that we hold. This includes appropriate measures to protect electronic materials and any materials that may be stored and generated in hard copy.



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ACCEPTANCE AND CHANGES TO SECURITY AND PRIVACY STATEMENT

Authorised Users acknowledge and accept that use of the ENABLE System indicates their acceptance of the ENABLE System "Terms and Conditions of Use" and this Security and Privacy Statement.

This is our current Security and Privacy Statement: Date of Publication November 2023 Version 1.4.

We may at any time vary the Security and Privacy Statement by publishing the varied Security and Privacy Statement on the ENABLE – ERMS System. Authorised Users accept that by doing this, Bright People Technologies has provided them with sufficient notice of the variation.

FURTHER INFORMATION

Further information about an individual's rights under the Privacy Act can be obtained from the Office of the Australian Information Commissioner on 1300 363 992.

Any further inquiries about our Security and Privacy Statement or inquiries about how any personal information is managed can be directed to the Privacy Officer for Kinatico at: privacyofficer@kinatico.com.