

This policy applies to Spark Consortium's Design and Construction Contractor - which comprises Webuild, CPB Contractors, GS Engineering and Construction and China Construction Oceania (**Spark**).

This policy was last updated on 14 December 2022. Spark may amend this policy from time to time. If we do, we will post the updated policy on this website.

We can be contacted at: contact@sparknel-dc.com.au

Employees and prospective employees should also refer to their employing entity's privacy policy.

1. What personal information is collected and stored?

At all times we try to only collect the information we need in order to deliver the Spark North East Link Design & Construct Project (**the Project**).

We collect, hold, use and disclose personal information from Spark's:

- employees and prospective employees,
- suppliers
- subcontractors
- consultants
- representatives,

whose scopes of work influence, contribute to, or otherwise assist in, delivering the Project.

We collect personal information like name, date of birth, contact details (including address, phone number and email). We may also collect personal information to verify identity, including information from driver licences, passport, and health care and concession cards.

Some of the information we collect is sensitive information (for example, information or opinion about an individual's racial or ethnic origin, political opinion, association memberships, religious beliefs, sexual orientation or criminal record). Spark only collected sensitive information if you have voluntarily provided it, or if its collection is required by law. It will only be accessed where this is required for legal reporting purposes.

You acknowledge that the personal information you provide to us is your own information. If you are a third party providing personal information, you acknowledge you are authorised to provide this information to us.

2. How do we collect personal information?

The main way we collect personal information is when you, or an authorised person gives it to us.

For example:

- you contact us to ask for information;
- you apply for a job vacancy with one of the Spark Consortium members and Spark undertakes referee, credit, medical and criminal record checks;
- you make a complaint to us;
- you ask for access to information that we hold about you;
- you are employed by one of the Spark Consortium members and asked to provide identification documents such as photos, licence, medicare card and passport;

- you communicate with Spark, for example when you participate in a Spark survey.
- you provide information by completing the Damstra registration form

We also collect personal information (including sensitive information) indirectly from publicly available sources or from third parties such as Spark's social procurement delivery partners if they are authorised to provide this information to us.

Use of cookies

A cookie is a small text file downloaded onto a computer or mobile device when a website is accessed, including Spark's intranet, SharePoint and systems. Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the website's owners and third parties.

Cookies allow a website to recognise a computer or mobile device. Cookies do not identify the individual but do identify the computer or mobile device used to access the Internet and can therefore be used to collect information about the individual's use of the Internet. Cookies do not allow access to any information stored on the individual's computer or mobile device.

Cookies are used to collect information, where available, about a computer or mobile device for system administration purposes, such as IP address, operating system, and browser type. Information collected through the use of cookies will only be used to evaluate Spark's intranet, SharePoint and systems' effectiveness and to improve user experience. Spark does not use cookies to identify an individual or to send targeted advertising.

3. How do we store and secure personal information?

We strive to ensure the security, integrity and privacy of personal information we collect. We take steps to ensure the security of personal information held by us so as to protect your information from unauthorised access, use, modification, destruction or disclosure. We store the personal information we collect on our cloud storage, on servers located in Australia.

Spark retains effective control over personal information held on our cloud, and the information is handled in accordance with the Australian Privacy Principles, the Information Privacy Principles and any other applicable code of practice defined in, and approved under, the *Privacy Act 1988* (Cth) and the *Privacy and Data Protection Act 2014* (Vic).

Access to personal information is restricted to authorised employees, contractors, agents and service providers, who must respect the confidentiality of any personal information held by us.

We periodically review and update our security measures in light of current technologies.

4. Why do we need to collect personal information?

Spark collects personal information so we can identify and communicate with you.

Spark also collect personal information so we can monitor and report on the fulfillment of our social procurement commitments over the duration of the Project.

5. How do we use and disclose personal information?

Spark does not use or disclose any personal information other than as is necessary to deliver the Project or comply with the law.

These are the common situations in which we disclose information:



Disclosure to the State

Personal information may be disclosed to the State of Victoria, State Associates, the North East Link Project Authority and State Representatives to verify compliance with Spark's Social Procurement Compliance Plan.

Disclosure to your Spark employer

Spark may disclose personal information to a Spark Consortium member who is also your employer or your prospective employer.

Disclosure to service providers

Spark uses a number of service providers to whom we disclose personal information. These include providers that host our website servers, manage our IT and manage our human resources information.

To protect any personal information we disclose to our service providers we:

- enter into a contract which requires the service provider to only use or disclose the information for the purposes of the contract; and
- require the service provider to keep, and make available to Spark on request, records detailing the recipient of any personal information the service provider has disclosed, the date of disclosure and the personal information that has been disclosed.

Disclosure of sensitive information

We only use and disclose sensitive information for the purposes for which you gave it to us or for directly related purpose that you would reasonably expect or if you agree, for example, so we can handle a complaint from you.

6. How can you access your personal information, or ask for a correction?

You have the right to ask for access to, or correction of, personal information that Spark holds about you. However, we may limit your access in certain circumstances. For example, if access would have an unreasonable impact on the privacy of another person, or where it would reveal evaluative information generated in connection with a commercially sensitive decision-making process. You also have the right to make a complaint if you believe that we have not complied with applicable privacy laws or regulations, Australian Privacy Principles or Information Privacy Principles.

To obtain access to, or correct the personal information Spark's hold about you, or to otherwise make a complaint or inquire about your rights, please contact us in writing using the contact details provided below.

Spark will acknowledge any complaints in writing as soon as practicable, and will aim to respond to any complaints or inquiries within 30 days. If we need more than 30 days to resolve your complaint, we will advise you of the reasons for the delay and ask for your consent to extend this day period.

7. How to contact us

By Email	contact@sparknel-dc.com.au
By Post	452 Johnston Street, Abbotsford, Melbourne, 3067 VIC Australia Att: Communications & Community Engagement