

PRIVACY POLICY (AU)

Introduction

SICE Pty Ltd ABN 113 609 055 (SICE, we, us, our) is committed to complying with applicable privacy laws in relation to the personal information that we collect in the course of running our business. Where applicable privacy laws provide for exceptions or exemptions, we may rely on those exceptions or exemptions in our information handling practices.

Please take a moment to read our Privacy Policy as it explains how we manage personal information, including our obligations and your rights in respect of our dealings with your personal information.

If you are a SICE employee, please refer to section 11 of this Privacy Policy, which contains specific information for our employees.

Key definitions

In this document:

- “**APPs**” means the Australia Privacy Principles set out in the Privacy Act;
- “**Personal information**” has the meaning set out 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 otherwise;
- “**Privacy Act**” means the Privacy Act 1988 (Cth); and
- “**Sensitive information**” has the meaning set out 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, religious beliefs or affiliations, criminal record, membership of a political, professional or trade association, and biometric and genetic information.

Document Control

This document is located at

[ANZ-SIC-DOC | IMS Policies](#)

Business Unit	Corporate
Security Classification - Confidentiality	<p style="text-align: center; background-color: yellow;">Proprietary</p> <p>Medium risk. All SICE ANZ Staff and Contractors are authorised to access this document. This document can be shared with authorised external organisations.</p>

Responsibilities

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Revision History

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00	03/02/2021	First version.	Sandra Olmo
01	15/03/2021	Second issue. New corporate identity	Manuel Gonzalez Arrojo
02	22/08/2023	General revision	Manuel Gonzalez Arrojo

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1 OVERVIEW

SICE is a technology and engineering services company.

We develop, implement, and operate technology solutions for infrastructure operators in various industries. These include intelligent traffic and tunnel systems, intelligent transport systems, environmental and energy infrastructure systems, smart cities systems, telecommunications infrastructure systems, process control systems and security systems. You can find more information on our website: <https://www.sice.com/en/>

Some of our infrastructure operator customers engage us to operate the technology solutions that we build for them. In these cases, we may be involved in handling personal information that the infrastructure operator collects and processes when using the technology solution for its business.

For example, a toll road operator may engage us to build and operate an intelligent traffic and tunnel system that includes various technologies such as vehicle detection and CCTV cameras (among other things). These systems collect various information and data for the toll road operator, and the toll road operator determines how that information and data is used. Our role is to maintain and operate the technology components on behalf of the toll road operator.

If you are using the products and services of one of our infrastructure operator customers (or otherwise engaging with that infrastructure operator), we recommend that you review the privacy policies of that infrastructure operator. These may provide more detailed explanations about how your personal information will be used by that infrastructure operator when you use their products and services (or otherwise engage with them).

We also collect and handle personal information in the course of operating our own business, such as providing services to our infrastructure operator customers, communicating with the public, stakeholders and the media (including through websites and social media) and managing our business operations (such as our offices, internal IT systems and staff).

2 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.

Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- when you make an inquiry or order in relation to goods or services, including through our website located at <https://www.sice.com/en> (the **Website**);
- when you engage us to provide you with goods or services;
- in administering and performing any contracts with service providers;
- when you contact us via telephone or other means;
- from correspondence (whether in writing or electronically);
- when you upload content to or interact (in an identifiable manner) with our Website or our social media pages;
- through any mobile applications provided by our organisation;
- through our recruitment processes;
- while conducting customer satisfaction and market research surveys;
- if you attend any of our premises, we may record certain contact details so that we can comply with applicable laws, and we may also record your image and/or voice if we have surveillance systems operating at those premises;

- when administering any of our services; and
- as otherwise required to manage our business.

In certain cases, we may collect personal information from publicly available sources and third parties, such as suppliers, recruitment agencies, your employers, contractors, our clients, and business partners.

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 and correct and update the information.

As noted in section 1, some of our infrastructure operator customers engage us to manage and operate the technology systems that we have built and implemented for them. These technology systems may collect various types of information and data, which is then used by the infrastructure operator. The infrastructure operator may ask us to process some of this information and data on its behalf.

3 TYPES OF PERSONAL INFORMATION WE COLLECT

The types of personal information we collect about you will depend on the circumstances in which the information is collected. The type of personal information we may collect can include (but is not limited to) your name, postal address, email address, phone numbers, date of birth, drivers licence, 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, pay rate and salary, bank details, feedback from supervisors, training records and logs of your usage of our equipment (e.g., phones, computers, and vehicles).

If we have or, in the future, make available any mobile applications for you to download and use, we may:

- Record details of your device details and operating systems; and
- If you have provided us with permission to access your device location when using our app, we may collect information about your geographical location.

We only collect sensitive information about you with your consent or otherwise in accordance with the Privacy Act. 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.

If we need to verify your identity, we may ask to see the appropriate identification (and, if reasonably necessary, take a copy of that ID). For example, where you are attending an access-restricted premises or facility that is under our management.

If you call us via telephone, we may monitor and, in some cases, record such telephone conversations for staff training, quality assurance and record-keeping purposes.

If you attend premises we operate or manage, we may:

- collect certain contact details that you provide to us (which may be via digital check-in apps), including the date and time of attendance, including so that we can comply with applicable laws (such as public health directives). If we collect such information to comply with a particular law, we will only use and disclose it in accordance with applicable laws; and
- record your image and/or voice through the use of Closed-Circuit Television (CCTV) systems for the purposes of managing the security of the premises and the health and safety of occupants and the public generally.

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 that we have requested, we may not be able to provide you with your requested goods or services and/or certain functionality of our Website and apps.

4 OUR PURPOSES FOR HANDLING YOUR PERSONAL INFORMATION

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances. The purposes for which we use and disclose your personal information will 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 that information and to whom we intend to disclose it at the time we collect your personal information.

We may use or disclose your personal information:

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

In general, we collect, use and disclose your personal information so that we can do business together and for purposes connected with our business operations (which include operating various information and data collection technologies on behalf of our infrastructure operator customers).

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

- providing services to our infrastructure operator customers;
- to operate the Website;
- where you have provided us with access to your geographical location via any of our mobile applications, we may send you push notifications and other electronic communications (including SMS) for purposes including optimise communications with you and for our compliance and marketing activities;
- to offer and provide any other goods or services to you or to receive goods or services from you;
- to provide you with tax invoices for our goods and services;
- to confirm your identity;
- to facilitate your entry and participation in a competition or trade promotion;
- to consider you for a job (whether as an employee or contractor) or other relationships with us;
- to optimise and customise the user experience (including content and advertising) for users of the Website and our other websites, mobile applications, and services;
- to protect the security and integrity of the Website and our other websites, mobile applications, and services;
- to operate, monitor, develop and improve our Website and our goods and services;
- to verify your identity, where this is required by law or we consider it reasonably necessary to do so;

- 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 goods and services;
- to protect the security, health and safety of our premises, facilities, personnel, and visitors;
- to comply with our legal and regulatory obligations;
- to address any issues or complaints that you or we 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.

5 THIRD PARTIES TO WHOM WE DISCLOSE YOUR PERSONAL INFORMATION

We may disclose your personal information to third parties in connection with the purposes described in section 4 of this Privacy Policy. This may include disclosing your personal information to the following types of third parties:

- our suppliers, contractors and organisations that provide us with technical and support services;
- our related entities (who may use and disclose the information in the same manner we can);
- 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 (e.g., referees); and
- in the unlikely event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors.

Where we have been engaged by our infrastructure operator customers to maintain and operate data collection technologies on their behalf, those customers will have access to the information and data collected through those systems. Our role is to maintain and operate those systems on behalf of that customer.

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

If we disclose information to a third party for our own business purposes, we generally require that the third party protect your information to the same extent that we do.

If you post information to certain public parts of our Website or to our social media pages, you acknowledge that such information may be available to be viewed by the public. You should use discretion in deciding what information you upload to such sites.

6 PROTECTION OF PERSONAL INFORMATION

In respect of personal information that we hold for our own business purposes, we will hold that personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas. We use a range of security measures to protect the personal information we hold, including by implementing IT security tools to protect our electronic databases.

We will destroy or de-identify that personal information once it is no longer needed for a valid purpose or required to be kept by law.

Any personal information that is collected by our infrastructure operator customers for their business purposes is stored in the manner determined by that customer.

7 DIRECT MARKETING AND ADVERTISING

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 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.

You may opt-out at any time if you no longer wish to receive direct marketing messages from us. You can make this request by contacting our Marketing Officer at anzsicecorpcom@sice.com.au.

8 COOKIES

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

We may use third-party vendors to show our ads on sites on the Internet and serve these ads based on a user's prior visits to our Website and other Internet activity. We may also use analytics data supplied by these vendors to inform and optimise our ad campaigns based on your prior visits to our Website.

9 ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You may contact us (see contact details in section 13) 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 reasonable costs incurred for providing you with access to the personal information we hold about you.

We are not obliged to correct any of your personal information if we do not agree that it requires correction or if we are otherwise permitted by law to refuse correction (for example, if a relevant exemption applies under applicable privacy laws). 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.

10 OVERSEAS TRANSFERS OF PERSONAL INFORMATION

Some of the third parties to whom we disclose personal information may be located outside Australia. The countries in which such third-party recipients are located depend on the circumstances. In the ordinary course of business, we commonly disclose personal information to recipients located in New Zealand, the United Kingdom, Spain, and the United States of America.

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.

By providing your personal information to us, you consent to us disclosing your personal information to any such overseas recipients for purposes necessary or useful in the course of operating our business and agree that APP 8.1 will not apply to such disclosures.

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 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).

11 EMPLOYEES

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

The information we collect may include (but is not limited to) contact details, qualifications, resume, current and former employment details, pay rate and salary, bank details, feedback from supervisors, training records and logs of the employee's usage of our equipment (e.g. phones, computers and vehicles), emergency contact details, visa details (to ensure that a prospective or current employee has the right to work in Australia), and passport details (if an employee is required to make overseas trips). If any information collected related to an employee becomes outdated, it is the responsibility of that employee to notify us of the correct information.

We may collect details of disabilities, allergies and health issues that may impact the 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 may also collect biometric information and templates (such as fingerprints) in order to provide secure access to our premises and equipment.

We may also collect sensitive information from you for the purposes of tracking information regarding the composition of our workforce to ensure, amongst other things, compliance with customer requirements on major projects, or legal and regulatory requirements. Aggregated workforce composition information may be included in our Corporate Annual Reports.

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.

Some of the common situations in which we may use or disclose employee personal information include:

- providing employee information to our customers where this is relevant to the employee's role (for example, where the employee is working at the customer's premises and is required to complete the customer's work health and safety training or other onboarding processes or where an employee is assisting a customer with testing activities and we provide the customer with that employee's phone number or contact details for the purpose of those testing activities);
- sharing employee information with our related companies within the SICE corporate group (some of which may be located outside of Australia), for example, as part of shared services arrangements or where necessary to comply with group-wide policies and procedures; and
- engaging third-party service providers that assist us with administering employment-related activities

or managing employee information (for example, recruitment agencies, outsourced payroll processors and IT service providers).

12 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 us (see our contact details in section 13).

When contacting us, please provide 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 5218, Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

13 OUR CONTACT DETAILS

For privacy-related issues or concerns, you can contact our Data Protection Officer at:

Postal address: Level 7/627 Chapel St, South Yarra VIC 3141

Email: anzsicedpo@sice.com.au

14 LINKS

Our Website may contain links to other websites operated by third parties. We make no representations or warranties in relation to privacy practices of any third-party website, and we are not responsible for the privacy policies or the content of any third-party website. Third-party websites are responsible for informing you about their own privacy practices and procedures.

15 SOCIAL MEDIA PLATFORMS

We use social media platforms such as LinkedIn to communicate with the public about our services and businesses. We may collect the information that you choose to share with us through these platforms, including photos, videos and 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 policy for LinkedIn on its website.

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. 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 13.

16 CHANGES

We reserve the right to change the terms of this Privacy Policy from time to time without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.