

Privacy Policy

About this policy

Your privacy is important to us. This is our Privacy Policy and it sets out how Geocon Group Pty Ltd ABN 36 165 918 356, Geocon Constructors (ACT) Pty Ltd ABN 56 163 299 769, Abode Hotels Canberra Pty Ltd ABN 81 041 402 610 and our related entities ('We', 'us' and 'our') collect, use and disclose your personal information.

We are bound by the Australian Privacy Principles contained in the *Privacy Act 1998* (Cth). The principles are designed to protect the privacy of individuals by regulating the way personal information is managed by Australian businesses. Personal information is any information that allows an individual to be personally identified.

We are bound by and acknowledge the importance of the Notifiable Data Breach Scheme, which has been addressed by us in our Data Breach Response Plan.

The purpose of this privacy policy is to describe:

- from whom we collect information
- the types of personal information collected and held by us
- how information is collected and held
- the purposes for which personal information is collected, held, used and disclosed
- how someone can gain access to their own personal information to seek correction
- how a complaint can be made and how a complaint will be handled
- how someone can inquire about our collection, handling, use or disclosure of personal information and how that inquiry will be handles
- whether we are likely to disclose personal information to overseas recipients
- how we report data breaches
- enhance the transparency of the business operations, and
- give individuals a better and more complete understanding of the sort of personal information we hold, and the way we handle that information.

From whom we collect information

Geocon collects information from clients, suppliers, staff and sub-contractors.

The information that we collect

We collect a variety of personal information of those that have made a transaction with us or completed work for us, as included in the table below.

Information	Description	Where we store it
Personal information	<ul style="list-style-type: none">• Name• Age and gender• Contact details (including address, phone and email addresses)	Information of this nature is securely stored both electronically and in hard copy, with access restricted on a 'needs-to know' basis.

Information	Description	Where we store it
Sensitive information (a subset of personal information)	<ul style="list-style-type: none"> • Bank account details • Financial information (ABN) • Trade or professional associations and memberships • Union membership • Criminal record • Health or genetic information 	Information of this nature is securely stored both electronically and in hard copy, with access restricted on a 'needs-to know' basis.

We will only collect your sensitive information if you have provided us with consent to do so, unless we are required to collect the sensitive information to prevent a serious threat to your life, health or safety.

However, we may also collect and hold other information required to provide services or assistance to you, including your emergency contact details, sensitive information, and information necessary to assess your creditworthiness.

Where practicable, we will give you the option of interacting with us anonymously.

How we collect your personal information

You may anonymously browse our website without providing any personal information. When browsing, we do not collect information identifying you or your computer, or information from which either might be identified.

We do collect some personal information if you choose to supply it to us through our website forms, by email, telephone or in person. By providing personal information to us, you consent to us collecting and storing this information as well as further information as may be provided by you in order that we may follow up your enquiries and best service your needs.

By subscribing to the forms on our website, you are actively asking us to supply you with information about our services and we will do this through the method of contact provided by you, which may be phone or email.

We collect personal information in a variety of ways, including (but not limited to):

- paper-based forms (provided by us or printed by you)
- electronic forms
- databases
- face to face meetings
- telephone communications
- email communications
- communications by fax
- our websites
- information provided through our social media sites
- through our related entities
- through our agents acting on our behalf.

We may also seek to collect information about someone else from you. However, you must not provide us with information about another person unless you have clear consent from that person to do so, let them know about this Privacy Policy, and where to find it.

A variety of information is collected by using our website and online services. Some of this may be personal information, which is summarised in the table below:

Information	Treatment
Emails and electronic forms	Our servers may record your email address if you send us a message online. Your email address will not be added to a mailing list unless you have provided it to us in order to subscribe to one of our subscription services. Where you choose to send us a completed electronic form that includes your personal details, we collect personal information such as name, address and email address. The information collected by email or electronic forms will be used only for the purpose for which you provided it, unless an exception applies.
Clickstream data	We make a record of your visit to the website and logs the following information for statistical purposes: the user's Internet Protocol (IP) address, the date and time of the visit to the site, the web pages accessed and documents downloaded, the previous site visited, and the user's web browser and operating system.
Google Analytics	In addition to web server logs, our website also uses Google Analytics, a web analytics service provided by Google Incorporated (Google). Reports obtained from Google Analytics are used to help improve our website. Google Analytics uses 'cookies' to help analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States of America. Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. Please refer to Google's Privacy Policy for further information.

How we use and disclose your personal information

The purpose for collection of your personal information is important as it restricts how we can use and disclose your personal information, unless an exception in the Privacy Act applies. Unless an exception applies, we will:

- only use or disclose your personal information for the purpose it was collected, and
- notify you of this purpose at the time of collection, or as soon as practicable after collection.

There are a number of general purposes for which we may collect your personal information. To provide further information regarding these purposes, the table below outlines the purpose for which information is typically collected, including information about how personal information is used and disclosed in accordance with that purpose. It also includes some brief information regarding how we restrict access to your personal information.

Purpose of collection	Use and disclosure	Access
To communicate, maintain and provide information to stakeholders or other interested parties who contact us regarding sales, applications, contracts.	Personal information may be disclosed to third parties and our related entities who manage or maintain the project on behalf of us.	Our teams responsible for the particular stakeholder group.
To maintain information details relating to permits, intentions, licensing, financial processes.	Personal information will be used for the approval of applications or licenses, the decision maker will have access to the relevant personal information.	Our staff responsible for the particular program or authorised and restricted members of that group with access to matter specific databases or reports.
To provide stakeholders and other interest parties copies of our information, publications and newsletters.	Personal information may be disclosed to third parties and our related entities who undertake mail out services on our behalf.	Our staff with the responsibility for distribution of requested information.
To record and make payments to consultants, contractors and other stakeholder groups.	Personal information would usually be disclosed to our staff, related entities, bankers or made by business cheque to ensure payments are made.	Information of this nature is generally accessed by finance and administrative staff and those involved with payments.
To maintain / administer any account you have with us and processing payments you have authorised.	Personal information would usually be disclosed to our staff, related entities and bankers.	Information of this nature is generally accessed by finance and administrative staff and those involved with payments.
To provide information or respond to any complaints, compliments or enquiries (including social media).	Personal information may be disclosed to deal with any incoming information.	Our staff responsible for source origin of the information.

Purpose of collection	Use and disclosure	Access
To undertake research, surveys and reports.	Personal information may be imported to spread sheets, survey monitoring tools and documents to report on and disclosed to third parties and our related entities.	Our staff responsible for the collection, collation and management of a particular survey
To respond to claims against us.	Personal information will be accessed by staff and disclosed to our related entities, advisors and insurers to assess the claims	Information of this nature is generally accessed by staff and those involved with the claims.
Quality assurance and training purposes	Personal information will be accessed by staff, our related entities and our advisors to improve our services to you.	Our staff with the responsibility for quality assurance and training.

We may also collect information for the following reasons:

- customer satisfaction through the provisions of products which best suit your needs;
- the provision of ongoing information about our products or upcoming events to people that we believe may be interested, but not if you have opted out from receiving such information;
- analysing broader market trends and demographics so that we may best serve our customers in the future;
- responding to your inquiries;
- communicating with you about works that may affect your premises;
- reporting to our owners or their shareholders; and
- any other purposes identified at the time of collecting your information.

However, we will only use or disclose your sensitive information for the purposes for which it was initially collected, other directly related purposes or purposes to which you otherwise consent.

We may disclose personal information to certain contracted service providers located outside of Australia. We will take reasonable steps (eg, contractual measures) to ensure that these providers comply with applicable Privacy Principles.

We may also disclose your information to our related entities and third parties who provide services to us or on our behalf, including:

- government bodies, regulators, law enforcement agencies and any other parties where required or otherwise permitted by law;
- our related entities and third parties who provide services to us, or to you on your behalf, including:
 - parties that manage customer accounts and billing;

- related entities that provide corporate services to us;
- external IT service providers, infrastructure and other third party service providers;
- mailing houses and marketing companies;
- in the case of claims (or likely claims), assessors, repairers, builders and investigators;
- parties that assess creditworthiness or assist in recovery against you if you are in breach of your obligations; and
- other entities that may offer you related products or services if you have opted-in to receive such information.

Information Treatment

We may supplement the personal information you supply through website forms with such further information may be necessary from time to time to follow up your particular enquiries. That further information may include other personal information relevant to your enquiries.

Please do not enter any information on our website forms other than information that pertains to you or a person who has given you his or her permission to supply information about them to us.

Storage and security of your personal information

We will take reasonable steps to protect the personal information that we hold from misuse, loss, unauthorised access, modification or disclosure. We will also take reasonable steps to ensure that the information is accurate and up to date. However, no data protection and security measures are completely secure. Despite all the measures we have put in place, we cannot guarantee the security of your information, particularly in relation to transmissions over the internet.

All personal information collected by us through our platforms listed is stored in a variety of formats including electronically in databases, in hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices. We will not store personal information for longer than necessary (or than we are legally allowed to) and when it is no longer required it will be deleted from the database. We may store information in 'the cloud' which may mean that it resides on servers situated outside of Australia.

Accordingly, any information which you transmit to us is transmitted at your own risk. You must take care to ensure you protect your information (for example, by protecting your usernames and passwords, customer details, etc) and you should notify us as soon as possible after you become aware of any security breaches. If we become aware of any security breaches, an internal process will be undertaken in accordance with our Data Breach Response Plan to conduct an assessment of the breach, and commence notification procedures, if necessary.

Permitted by law, personal information collected by us through our platforms listed will not be disclosed by us to any person (other than an employee of ours or our related entities) or organisation without the consent of the person to whom the information pertains.

Accuracy, access and correction

We take reasonable steps to ensure the information we collect and hold about you is accurate, up-to-date and complete, and if used or disclosed, also relevant.

Please let us know as soon as possible if there are any changes to your information or if you believe the information we hold about you is not accurate, complete, up-to-date or is otherwise misleading.

We will, on request, provide you with access to the information we hold about you unless otherwise required or permitted by law. We will notify you of the basis for any refusal to allow you access to your information.

At any time you may request that we stop contacting you. This may be done using the contact details at the end of this policy.

When we disclose personal information

We only use personal information for the purposes for which it was given to us, or for purposes which are related (directly related in the case of sensitive information) to one or more of our functions or activities.

We may disclose your personal information to government agencies, our service providers, agents, contractors, business partners and other recipients from time to time, only if one or more of the following apply:

- You have consented
- You would reasonable expect us to use or disclose your personal information in this way
- We are authorised or required to do so by law
- Disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety
- Where another permitted general situation or permitted health situation exception applies
- Disclosure is reasonably necessary for a law enforcement related activity

When you visit our website a 'cookie' is stored on your computer or mobile device by our server. We use cookies to maintain user sessions. We may use this information to generate statistics about how many people visit our site and how people use our website. However, generally this information will not identify you and we do not link this information back to your identity or other information that you have provided to us. We do not store any information that identifies you inside cookies.

Most web browsers are set by default to accept cookies. However, if you do not wish to receive cookies, you may set your browser to either prompt or refuse cookies.

Sometimes our website contains links to other websites, for your convenience and information. When you access a website other than our own, please understand we are not responsible for the privacy policies of that site. We suggest you review the privacy policies of each site you visit.

Notification of Data Breaches

If we have reasonable grounds to suspect that a data breach has occurred, we will:

- Complete an assessment of the suspected data breach within 30 days;
- If appropriate, take remedial action to address any potential harm to individuals that may arise due to a relevant data breach before any serious harm is caused to individuals to whom the information relates.

We will otherwise comply with privacy data breach notification requirements, including notifying affected individuals and the Office of the Australian Information Commissioner, as applicable.

Revision of our Privacy Policy

We may revise this Privacy Policy or any part of it from time to time. Please review this policy periodically for changes. If we make significant changes to this policy, we may notify you using the contact details provided by you or by putting a notice on our website

Your continued use of our website, services, requesting our assistance or the provision of further personal or sensitive information to us after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

How you can complain regarding the treatment of your personal information

If you have an inquiry or complaint relating to our Privacy Policy or compliance with applicable Privacy Principles, please contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint, as well as any supporting evidence and/or information.

We will refer your inquiry or complaint to our Privacy Officer. They will, within a reasonable time, investigate the issue and determine the steps that we will undertake to resolve any complaints. We will contact you if we require any additional information from you and will notify you in writing of the response or determination of our Privacy Officer.

If you are not satisfied with our response or determination, you can contact us or raise your concerns with the Australian Privacy Commissioner via www.oaic.gov.au.

If you believe we have breached the APPs or mishandled your personal information, or you have any questions about this Privacy Policy, please call us on 02 6255 0430.

