

| Version | Approved by | Approval date | Effective date | Next review |
|-------------------|--|---------------|----------------|-------------|
| 1.0 | Chief Operating Officer | 16 April 2021 | 16 April 2021 | April 2022 |
| Policy Statement | | | | |
| Purpose | Maas Group Holdings (The Company) and its related entities (The Companies) recognise the importance of privacy and recognise people’s rights regarding how their personal information is collected and utilised. This policy details how the Company may collect, hold, and disclose personal information. | | | |
| Scope | This Policy applies to all employees of Maas Group Holdings (The Company) and related business entities (The Companies). | | | |
| Policy Provisions | | | | |

1. Statement

The Company recognises the importance of protecting your privacy and personal information. The Company is bound by the Privacy Act 1992 (Cth) which regulates how we collect, use, disclose and store personal information, including sensitive information, and how individuals may access and correct records containing their information. We respect your rights to privacy under the Privacy Act and we comply with all the Privacy Act requirements in respect of the collection and management of your personal information/Employee Record.

2. Information Collection

The Company collects and handles information for the purpose of recruiting and engaging employees and contractors, and to properly manage the employment of our team and manage business affairs.

2.1. Types of information collected

- Employee, contractor personal and contract details.
- Referee and emergency contact details.
- Job applications.
- Employment contracts, and other records relating to employment and contractor engagement.
- Salary and leave records.
- Superannuation, taxation, and banking details.
- Medical certificates and health related information.
- Information relating to training, conduct and performance.

2.2. How information is collected

We will generally collect personal information directly from individual employees, contractors, and applicants to create and maintain your Employee Record. We may collect information from other persons, such as supervisors, stated referees, recruitment agents, and previous employers.

We may collect and use your health and other personal information to ensure the health and safety of your work colleagues, including managing potential, suspected, or confirmed cases of COVID-19 or similar medical conditions as they arise. We may also collect and use personal information about your family members, or others with whom you live for this purpose.

3. Information Disclosure

The Company may disclose any of the personal information that has been collected or received as follows:

- to our contractors or third-party service providers who provide services or perform functions on our behalf.
- to our professional advisors and agents in relation to business operations
- in response to a subpoena or other legal process by a governmental entity or third party, or if otherwise required by law.
- to protect or enforce our rights or property.
- in the event of the sale or dissolution (bankruptcy) of assets, in whole or in part, of or any of its affiliates; and
- to our affiliates and subsidiaries, for purposes consistent with this Privacy Policy.

In addition, we may share aggregate or non-personally identifying information with selected third parties for marketing, advertising, research, or other purposes. We will not disclose, sell, share, or trade your Personal Information to any third parties.

Your health and other personal information will only be disclosed to Managers of the Company on a need-to-know basis.

Where your Human Resources personal information is requested by an overseas entity we will only disclose with your full consent, or where it is authorised and required by law.

3.1. Responsibilities

All employees and managers who have been given access to the Personal Information or Employee Record of other employees must treat that information with due respect and care.

The Personal Information and Records of employees are not to be reproduced and/or shared without the advice and authorisation of the HR department who are the authorised holders of such information. Personal Information should also not be left unattended on desks in shared office spaces.

4. Accessing or updating your personal information

Subject to exceptions allowed by law, you have the right to request access any personal information we hold about you and seek its correction. You can contact our HR department to do this or if you have a complaint concerning your information privacy.

Where we hold information that you are entitled to access, we will provide you with suitable means of accessing it (e.g. by mailing or emailing it to you). If you require access in a particular form, please indicate this in your request.

We will take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, and modification or disclosure. Information is stored both electronically and in paper files in secured locations.

We are required to hold all legal files for a minimum of 7 years. In some cases, this retention period may be longer. If we no longer require the use of your personal information. We will take reasonable steps to securely destroy or permanently De-identify it.

The company makes every endeavour to ensure the safety and security of our internal networks, we also recognise internet is not always a secure environment and as such we only save data in secure Company databases and networks. If you use the internet and networks outside of those owned by the Company to send us any information, it is sent at your own risk.

5. Reporting a breach of privacy

If you believe that we have breached your privacy, please contact the HR department to provide details of the incident so that it may be investigated.

Where a complaint is made the Company will investigate the possible breach. The Company will deal with your complaint as quickly as possible and will keep you informed of its progress. Once the

Company has completed the investigation, you will be advised of the outcome and any corrective actions required in writing.

If, at any time, you are unclear about the application of these guidelines, or require further information, you should speak to your manager or the Human resources Manager.

Non-compliance with this policy may result in disciplinary action, up to and including dismissal in the most serious cases., Employees who breach the law may be personally liable for their action.

| Accountabilities | |
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| Responsible Officer | Chief Operating Officer |
| Contact Officer | Group Human Resources Manager |
| Supporting Information | |
| Legislative Compliance | This Policy supports the organisations compliance with the following legislation: <ul style="list-style-type: none"> - Privacy Act 1988 (Australia) https://www.legislation.gov.au/Details/C2020C00237 |
| Supporting Documents | MGH-MAN-0001 Code of Conduct MGH-PRO-3002 Notifiable Data Breach Procedure |
| Related Documents | MGH-POL-1016 Discipline Policy |
| Superseded Documents | Nil |
| File Number | MGH-POL-XXXX |
| Definitions and Acronyms | |
| The Companies | The companies that make up Maas Group Holdings, inclusive of but not limited to Maas Group Companies, Regional Group Companies, EMS Group Companies and JLE Group Companies. |
| The Company | Maas Group Holdings inclusive of all business units. |
| De-identify | Personal information is <i>de-identified</i> if the information is no longer about an identifiable individual or an individual who is reasonably identifiable. |
| Employee | All directors, officers, and employees of the company (whether permanent, fixed term, casual, contracting, consulting or temporary). |
| Employee Record | In relation to an employee, means a record of personal information relating to the employment of the employee. Examples of personal information relating to the employment of the employee are health information about the employee and personal information about all or any of the following: <ul style="list-style-type: none"> - the engagement, training, disciplining or resignation of the employee - the termination of the employment of the employee - the terms and conditions of employment of the employee - the employee's personal and emergency contact details - the employee's performance or conduct - the employee's hours of employment - the employee's salary or wages - the employee's membership of a professional or trade association - the employee's trade union membership - the employee's recreation, long service, sick, personal, maternity, paternity or other leave - the employee's taxation, banking or superannuation affairs. |

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| Personal Information | Information or an opinion about an identified individual, or an individual who is reasonably identifiable: <ul style="list-style-type: none">- whether the information or opinion is true or not; and- whether the information or opinion is recorded in a material form or not. | | | |
| Revision History | | | | |
| Version | Approved by | Approval date | Effective date | Sections modified |
| #. # | [to be completed] | [to be completed] | [to be completed] | [to be completed] |