

PRIVACY POLICY

1. Your rights in relation to privacy

Michels Trenchless Pty Ltd (ABN 45 576 105 405) (**the Company**) understands the importance of protecting the privacy of an individual's personal information. This statement sets out how the Company aims to protect the privacy of your personal information, your rights in relation to your personal information managed by the Company and the way the Company collects, holds, uses and discloses your personal information. Michels Corporation provides professional services to Michels through a Professional Services Agreement.

In handling your personal information, the Company will comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and with the 13 Australian Privacy Principles in the Privacy Act. This policy statement may be updated from time to time.

2. What kinds of personal information does the Company collect?

Personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of its services, the Company may collect your personal information.

Generally, the kinds of personal information the Company collects are contact and

whether you are able to perform the inherent requirements of the particular role; and

- iv. professional or employment-related information, for example: educational institutions attended, degrees and certifications, licences, work experience and previous employers, professional memberships and affiliations, union representation, seniority, training, employment start and ending dates, and job title;
- v.

There may be occasions when the Company collects your personal information from other sources such as:

an information services provider;

a publicly maintained record or other publicly available sources of information including social media and similar websites;

if for recruitment purposes, an external recruitment or background screening services provider; or

automated technologies on Company's electronic resources, for example, to track logins and activity across Company network;

surveillance/recording technologies installed by Company, for example, video surveillance in common areas of Company facilities, global positioning system ("GPS") technologies, voicemail technologies, webcams, audio recording technologies, and blue-tooth technologies, any of these with consent to the extent required by law;

union agreements, including collective bargaining agreements and other agreements between Company and a union; or

government or administrative agencies.

Generally, the Company will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you.

4. Why does the Company need your personal information?

The Company collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of:

Managing Personnel

- a. Administration, including:
 - i. To manage personnel and workforce matters
 - ii. To communicate with the workforce
 - iii. To plan and arrange work supplies and workspaces
 - iv. To fulfill recordkeeping and reporting responsibilities
 - v. For recruitment of new employees or contractors
 - vi. To resolve internal grievances and disciplinary issues
 - vii. To make business travel arrangements

- vii. To conduct product and service training
 - viii. To conduct research and development
 - ix. To conduct quality assurance and improvement
 - x. For event planning
 - xi. To engage in crisis management
- f. Miscellaneous Other Purposes, including:
- i. To efficiently manage and operate administrative, information technology, and communications systems, risk management and insurance functions, budgeting, financial management and reporting, and strategic planning;
 - ii. To manage litigation involving Company, and other legal disputes and inquiries and to meet legal and regulatory requirements;
 - iii. In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of Company or any of its subsidiaries or affiliates;
 - iv. To manage licences, permits, and authorisations applicable to Company's business operations; and
 - v. To protect the rights, property, or safety of Company, Covered Individuals, customers, or others.
 - vi. To exercise the Company's rights under applicable law and to support any claim, defence, or declaration in a case or before a jurisdictional and/or administrative authority, arbitrator, or mediation panel.

The Company may also use your personal information for purposes related to the above purposes and for which you would reasonably expect the Company to do so in the circumstances, or where you have consented, or the use is otherwise in accordance with law.

Where personal information is used or disclosed, the Company takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to the Company. However, without certain information from you, the Company may not be able to provide its products and/or services to you.

5. To whom does the Company disclose your personal information?

The Company discloses your personal information for the purpose for which the Company collects it. That is, generally, the Company will only disclose your personal information for a purpose set out at paragraph 4. This may include disclosing your personal information to: third parties engaged to perform administrative or other business management functions;

people or entities considering acquiring an interest in the Company's enterprise or assets;

the Company's professional advisors, contractors, consultants and related bodies corporate;

insurance providers;

regulatory bodies; affiliated companies (or) other companies within the Michels family of companies

Please direct all privacy complaints to the Company's Privacy Compliance Officer. At all times, privacy complaints:

- will be treated seriously;

- will be dealt with promptly;

- will be dealt with in a confidential manner; and

- will not affect your existing obligations or affect the commercial arrangements between you and the Company.

The Company's Privacy Compliance Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.