

PRIVACY POLICY

CONTENTS

1. Purpose.....	2
2. Scope.....	2
3. Commencement of the Policy	2
4. Our Commitment	2
5. What Is Personal Information.....	2
6. What Information Do We Collect.....	3
7. How Do We Collect Information	3
8. Why do we Collect Personal Information	4
9. Sensitive Information	5
10. Disclosure of Personal Information.....	5
11. Overseas Disclosure And Storage.....	6
12. Website, Cookies and Analytics	6
13. Direct Marketing	6
14. Employee Records.....	7
15. Security And Retention	7
16. Data Breaches	7
17. Accessing And Correcting Your Information.....	8
18. Privacy Complaints.....	8
19. Contact Us	8
20. Related Documents	8
21. Changes To This Policy.....	8

Authorised By Glenn Fordham

Reviewed By Nikki Joseph / Julianna Katar

Policy Maintained By Human Resources

Effective Date 27 July 2026

Review Date 27 July 2029

Document No TRN-HR-POL-044

Version 1.0

Any person who requires assistance in understanding any aspect of this document should contact the Human Resource Department.

1. PURPOSE

- 1.1. TRN Group ('TRN') respects your privacy and is committed to protecting the personal information it collects and holds.
- 1.2. This Privacy Policy explains how TRN Group collects, holds, uses, stores and discloses personal information and how you may access or correct your personal information or make a privacy-related complaint.
- 1.3. In this policy, "TRN Group", "we", "us" and "our" refer to TJ & RF Fordham Pty Ltd T/As TRN Group.
- 1.4. We handle personal information in accordance with the *Privacy Act 1988* (Cth), the Australian Privacy Principles and other applicable laws.

2. SCOPE

- 2.1. This Policy applies to all personal information collected by TRN Group in connection with its business operations, including information relating to employees, prospective employees, contractors, subcontractors, labour hire personnel, customers, suppliers, consultants, visitors and users of our websites and services.

3. COMMENCEMENT OF THE POLICY

- 3.1. This policy will commence on 27 July 2026. It replaces all other privacy policies and procedures of TRN (whether written or not).

4. OUR COMMITMENT

- 4.1. TRN Group is committed to:
 - collecting personal information lawfully and fairly;
 - protecting personal information through appropriate security measures;
 - only using and disclosing personal information for legitimate business purposes;
 - complying with applicable privacy legislation; and
 - responding promptly to privacy enquiries and complaints.

5. WHAT IS PERSONAL INFORMATION

- 5.1. Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable. It includes information recorded in any form, whether or not the information is true.
- 5.2. Sensitive information is a type of personal information that may include information about a person's health, racial or ethnic origin, professional or trade association membership, union membership, criminal record or biometric information.

6. WHAT INFORMATION DO WE COLLECT

6.1. The personal information we collect depends on your relationship and dealings with us. It may include:

- your name, address, email address and telephone number;
- your date of birth and emergency contact details;
- employment, occupation and business information;
- identification documents, licences, qualifications, competencies and training records;
- employment applications, résumés, references and work history;
- bank account, payment, taxation and superannuation details;
- information required to assess creditworthiness or establish commercial accounts;
- information contained in tenders, contracts, quotations, purchase orders and project documentation;
- site induction, attendance, access-control and visitor records;
- vehicle, plant and equipment details;
- photographs, video recordings and CCTV footage;
- location or telematics information associated with company vehicles, plant, equipment or authorised work activities;
- health, medical, injury, workers compensation and fitness-for-work information where reasonably necessary;
- incident, safety, environmental, quality and compliance records;
- information about dealings with our clients, subcontractors, suppliers and consultants;
- correspondence, enquiries, feedback and complaint information;
- information collected when you use our website, including your IP address, browser type, device information and website usage data; and
- any other information you provide to us or that we are required or authorised by law to collect.

6.2. Where lawful and practicable, you may interact with us anonymously or using a pseudonym. This may not be possible where we need to identify you to provide a service, manage site access, enter into a contract or comply with legal and safety requirements.

7. HOW DO WE COLLECT INFORMATION

7.1. We generally collect personal information directly from you, including when you:

- contact or correspond with us;

- visit our website or submit an online enquiry;
- request a quotation or tender information;
- enter into a contract or commercial arrangement with us;
- apply for employment or provide services as a contractor;
- complete a site induction, sign-in process or safety form;
- attend one of our offices, worksites, quarries or facilities;
- participate in a meeting, survey, event or promotional activity; or
- otherwise deal with us in the course of our operations.

7.2. We may also collect information from:

- your employer, representative or authorised contact;
- clients, principal contractors, subcontractors and suppliers;
- referees, recruitment agencies and labour-hire providers;
- training organisations and licence or qualification issuers;
- government agencies, regulators and industry bodies;
- insurers, medical providers and rehabilitation providers;
- credit-reporting or background-check services where permitted by law;
- publicly available sources; and
- our technology, security, fleet-management and website service providers.

If you provide us with personal information about another person, you should ensure that you are authorised to do so and, where appropriate, make that person aware of this Privacy Policy.

8. WHY DO WE COLLECT PERSONAL INFORMATION

8.1. We may collect, hold, use and disclose personal information for purposes including:

- conducting our civil construction, earthworks, haulage, quarrying and plant-hire operations;
- responding to enquiries and providing information about our services;
- preparing and assessing quotations, tenders and contracts;
- managing projects, worksites, clients, subcontractors, suppliers and consultants;
- procuring goods and services and processing invoices and payments;
- undertaking recruitment, workforce planning and employment administration;
- verifying identities, licences, qualifications and competencies;

- managing workplace health and safety, site access, security and emergency responses;
- monitoring and managing vehicles, plant, equipment and authorised work activities;
- investigating incidents, injuries, complaints or suspected misconduct;
- managing insurance, workers compensation and rehabilitation matters;
- conducting financial, administrative, quality, environmental and risk-management activities;
- maintaining and improving our services, systems, website and business operations;
- communicating company news, capability information or other material that may be relevant to our business contacts;
- protecting our legal rights and responding to legal claims;
- complying with contractual obligations, court orders and applicable laws; and
- any other purpose disclosed at the time of collection or for which you have provided consent.

8.2. If you do not provide requested information, we may be unable to respond to your enquiry, provide services, engage you, allow access to a worksite or meet our legal and contractual obligations.

9. SENSITIVE INFORMATION

9.1 We only collect sensitive information where:

- you have consented and the information is reasonably necessary for our functions or activities;
- collection is required or authorised by law; or
- another exception permitted by law applies.

9.2 Sensitive information will only be used or disclosed for the purpose for which it was collected, a directly related purpose that you would reasonably expect, or as otherwise required or permitted by law.

10. DISCLOSURE OF PERSONAL INFORMATION

10.1. We may disclose personal information, where appropriate, to:

- related entities within TRN Group;
- clients, project owners and principal contractors;
- subcontractors, consultants, suppliers and joint-venture participants;
- recruitment agencies, labour-hire providers and referees;
- training providers and industry accreditation bodies;
- banks, payment providers, accountants, auditors and financial advisers;
- insurers, insurance brokers, medical practitioners and rehabilitation providers;
- legal advisers and other professional advisers;

- IT, cloud-storage, telecommunications, data-hosting, security and website providers;
- government departments, councils, emergency services, regulators and law-enforcement agencies;
- courts, tribunals and dispute-resolution bodies;
- prospective purchasers or advisers involved in a proposed sale, restructure or transfer of all or part of our business; and
- other parties where you have consented or where disclosure is required or authorised by law.

10.2 TRN Group does not sell personal information to third parties.

11. OVERSEAS DISCLOSURE AND STORAGE

- 11.1. TRN Group may engage third-party service providers that store or process personal information using facilities located outside Australia. Where we disclose personal information to an overseas recipient, we will take reasonable steps required by applicable privacy law to ensure that the information is handled appropriately.
- 11.2. Overseas recipients may be located in countries where our cloud hosting, software or technology providers operate. The countries may change from time to time depending on the service providers we engage.
- 11.3. Because service-provider locations can change, it may not always be practicable to identify every country in which information is stored or processed.

12. WEBSITE, COOKIES AND ANALYTICS

- 12.1. Our website may use cookies and similar technologies to operate the website, remember user preferences, monitor performance and understand how visitors use the website.
- 12.2. The information collected may include your IP address, browser type, device type, pages visited, referring website and the date and time of your visit.
- 12.3. We may use third-party analytics services to help us understand how visitors use our website. These providers may collect or process information in accordance with their own privacy policies.
- 12.4. You can usually adjust your browser settings to reject or delete cookies. Disabling cookies may affect the operation of some website features.
- 12.5. Our website may contain links to external websites. We are not responsible for the privacy practices or content of those websites and recommend reviewing their privacy policies.

13. DIRECT MARKETING

- 13.1. We may use your contact details to send you information about our services, capabilities, projects or business activities where permitted by law.

13.2. You may opt out at any time by:

- using the unsubscribe facility included in the communication; or
- contacting us using the details below.

13.3. We will process an opt-out request within a reasonable period and will not charge you for making the request.

14. EMPLOYEE RECORDS

14.1. The handling of current and former employee records may be exempt from parts of the *Privacy Act 1988* where the records are directly related to the employment relationship.

14.2. Where the exemption does not apply, or where other legislation applies, we will handle employee information in accordance with our legal obligations and relevant internal policies.

14.3. This includes recruitment records, payroll records, training records, competency records, safety records, workers' compensation records and other employment-related information.

15. SECURITY AND RETENTION

15.1. We take reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure.

15.2. Our safeguards may include:

- access controls and user authentication;
- secure electronic systems and physical storage;
- confidentiality obligations;
- staff training and internal procedures;
- system monitoring, backups and cybersecurity controls; and
- controls applying to third-party service providers.
- multi-factor authentication where appropriate;
- secure disposal of physical records.

15.3. No electronic transmission or storage system is completely secure. While we take reasonable precautions, we cannot guarantee the security of information transmitted over the internet.

15.4. We retain personal information only for as long as it is reasonably required for our business activities or legal, contractual, insurance and record-keeping obligations. When information is no longer required, we take reasonable steps to securely destroy or de-identify it, unless the law requires it to be retained.

16. DATA BREACHES

16.1. If we become aware of a suspected data breach, we will assess and respond to it in accordance with our legal obligations.

- 16.2. Where a breach is likely to result in serious harm and the Notifiable Data Breaches scheme applies, we will notify affected individuals and the Office of the Australian Information Commissioner as required.

17. ACCESSING AND CORRECTING YOUR INFORMATION

- 17.1. You may request access to the personal information we hold about you or ask us to correct information that is inaccurate, out of date, incomplete, irrelevant or misleading.
- 17.2. Requests should be made using the contact details below. We may need to verify your identity before processing a request.
- 17.3. We will respond within a reasonable period. We generally do not charge for making a request, although we may charge reasonable costs associated with providing access where permitted by law.
- 17.4. In some circumstances, we may refuse access or correction as permitted by law. If this occurs, we will generally provide written reasons and information about available complaint mechanisms.

18. PRIVACY COMPLAINTS

- 18.1. If you have a question or complaint about how we have handled your personal information, please contact our Privacy Officer using the details below.
- 18.2. Please provide sufficient information for us to understand and investigate your concern. We will acknowledge your complaint and aim to respond within a reasonable period.
- 18.3. If you are dissatisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner
 Website: www.oaic.gov.au
 Telephone: 1300 363 992

19. CONTACT US

TRN Group
 Address: PO Box 431, Camden NSW 2570
 Email: hr@trn.com.au
 Telephone: (02) 4654 9900

20. RELATED DOCUMENTS

This policy should be read in conjunction with the Recruitment & Selection Policy, Health Information Collection Policy, Code of Conduct and Employee Information Disclosure Procedure.

21. CHANGES TO THIS POLICY

We may update this Privacy Policy periodically to reflect changes to our operations, systems, service providers or legal obligations. The current version will be available on our website and will state the date it was last updated.