



1.0 Purpose.

BIC Services and Consolidated are integrating into one business with aligned policies and procedures. As an integrated business, both are herein referred to as 'the Company'.

This document sets out the standards and expectations that underpin how the Company handles the collection and use of personal information for all Company employees, employee candidates (people applying for a job with the Company), supplier partners, customers, and the general public who may interact with the Company, their systems and platforms, on a day-to-day basis.

The Company recognises the importance of protecting an individual's privacy and personal data. This policy explains how the Company collects personal information, how it is used, how it is stored and securely managed in all instances.

2.0 Scope.

2.1 This policy applies without exception to all personnel of the Company. It applies when an employee acts as a representative of the Company either in the course of the performance of the required duties of their role, taking action and making decisions for or on behalf of the Company.

2.2 This policy applies to how the Company, its employees and delegates use personal information and data collected in the course of standard business practices.

2.3 Importantly, this policy also provides guidance on how our employees interact and access personal data, information, and records on customer sites where our employees act as customer representatives in the course of their assigned role.

3.0 Non-negotiable Principles.

- We will never share or release personal information or data without consent or notice.
- We will never collect, store or share sensitive information about any person without consent or notice.
- We respect the privacy and integrity of all people and acknowledge that the protection of their personal data must be central to our business and managed to the highest priority.
- We acknowledge that failure to comply with the obligations and principles of the Australian Privacy Act 1988 could incur large fines and reputational brand damage.

4.0 Definitions.

The Company: refers to Consolidated Property Services (Australia) Pty Ltd and BIC Services Pty Ltd integrated as one business, as members of the Bidvest Group of companies.

Employee: a person who has accepted employment with the Company (whether permanent, fixed term or casual), suppliers, consultants and directors wherever located.

Personal Information: Information or personal identifiable details about an individual. Common examples include:

- A person's name, signature, home address, email address, telephone number, date of birth, and employment details will generally constitute personal information.
- Information about a person's working habits and practices.
- A person's employment details, such as work address and contact details, salary, job title and work practices.

Sensitive Information: is defined under the Privacy Act and includes information about an individual's racial or ethnic origin, political opinions, professional or political or religious affiliations or memberships, sexual orientation, criminal record, health and/or genetic factors, financial or banking



details.

5.0 Collection.

The Company collects personal information when it is required to transact day-to-day business operations, facilitate customer outreach or service support.

6.0 Use.

6.1 **General use:** The Company uses personal information it collects to communicate with its customers and employees as required for business purposes. This can include:

- To identify individuals and verify their identity in the course of a service transaction, request for service or undertake business correspondence (this can include customer, employee, service provider and employee candidate correspondence).
- To develop, manage, administer, coordinate, and improve the quality of the services and support the Company provides to customers and employees alike.
- To understand the individual, and how the Company can:
 - Tailor their correspondence and offering to meet the individual's specific service needs, or
 - Ascertain the skills, capability, and experience of an employee candidate, or
 - Fulfill the Company's responsibilities as an employer, and/or
 - Comply with the Company's legal and statutory obligations.
- To market or promote The Company's services to customers and potential customers.
- To detect and prevent fraudulent activity throughout business operations.
- To conduct market, customer and other research to continuously improve the Company's service offering, communications and useability of digital platforms and applications.

6.2 **Using Personal Information for direct marketing:** The Company may use personal information to send promotional material. The Company is required to comply with the Spam Act 2003 (Cth) and the Privacy Act 1988 when it sends any electronic communications – and this includes an option for individuals to 'opt out' of any ongoing or future communications from the Company.

7.0 Disclosure.

7.1 **To Company Employees:** In the general course of business, the Company may disclose personal information to internal employees – where such disclosure is required in order to conduct a business transaction, meet service requirements or resolve a service request. In all instances, such internal disclosures of personal information are treated as confidential and are subject to the Company's Privacy Policy.

7.2 **To Company Service Partners – Suppliers:** The Company may disclose personal information to service partners, where such disclosure is required to facilitate a service request or business transaction. Such third-party disclosure of personal information is treated as confidential and is subject to the Company's Privacy Policy. The Company requires third-party service partners to manage and store and handle personal information in strict compliance with Australian State and Federal Privacy guidelines.

7.3 **Sensitive Information:** No sensitive information is disclosed to a third-party service partner without an individual's prior consent (for example banking, tax, superannuation, or financial details may be shared with regulatory agencies, financial bodies and institutions when commencing a new employee. The sharing of this information is required to facilitate payment or register the employment of an individual and the Company has been granted consent as part of the employment application process).



7.4 **Protection of People, Company Rights and Property:** The Company may disclose personal information where it reasonably believes such disclosure is required to protect any person, Company rights or property.

7.5 **Overseas disclosure:** The Company will not disclose personal information to any overseas agency, partner, or business entity unless such disclosure relates to the main reason the personal information was collected in the first instance. Where such disclosure does occur, the Company requires overseas service partners to manage and store and handle personal information in strict compliance with Australian State and Federal Privacy guidelines.

8.0 Security and storage.

Increasingly, data records are stored digitally with less reliance on paper or physical storage. The Company holds personal information in a combination of hard copy and electronic files.

The Company may use third-party information systems and database providers to store personal information in applications or on servers. These systems are subject to robust cyber and data protection protocols to limit access and secure storage. Where data is stored electronically, the Company requires service partners to manage and store and handle personal information in strict compliance with Australian State and Federal Privacy guidelines.

The Company continually reviews the legislative requirements and latest industry standards for protection of data and cyber security. This includes a review of all Company policies and procedures to safeguard access to personal information.

9.0 Accuracy and access.

The Company will take reasonable steps to ensure that the information we hold is accurate, complete, and up to date. Where an individual seeks access to the personal information we hold, simply contact us to review, amend or correct information we hold.

10.0 Ownership and Version Control

Policy Owner	Head of Risk Management
Version	1.0
Date	April 2024
Classification	Public
Revision Status	Published
Author	Linden Davidson
Revision Date	April 2026

Revision	Description	Author
1.0	BIC/CPS original + Initial Draft	LD, CE, SS, TS, CV, JD
1.1	Executive Management Team Review	EMT
1.5	Format and Re-brand	LD