

PRIVACY POLICY

This Policy sets out the requirements for privacy across CIMIC Group Limited and entities it controls (**the Group**).

This Policy applies to all employees of the Group, third parties engaged by the Group, and all alliances and joint ventures in all jurisdictions.

Any employee of the Group found to have breached this Policy may be subject to disciplinary action.

The **objectives** of this Policy are to treat personal information:

- in Australia including that of its Australian customers and business partners, in accordance with the Australian Privacy Act 1988 (Cth) (the **Privacy Act**) and the Australian Privacy Principles (**APPs**); and
- outside Australia, in accordance with the applicable law.

1. What personal information do we collect?

Personal information is any information (including an opinion) which can be used to identify an individual. Sensitive information is a subset of personal information which includes information about an individual's race or ethnicity, political or religious beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences, criminal record and health information.

Personal information will not be shared, sold or disclosed other than in accordance with this Policy, without an individual's permission, or in accordance with the Privacy Act.

CIMIC only collects, holds, uses or discloses personal information where it is reasonably necessary to:

- enable CIMIC to deliver services or information to individuals or to an organization;
- maintain or establish a business relationship, including as a customer, supplier, contractor, or employee;
- enable CIMIC to assist to provide services; or to improve, and better understand preferences in respect of CIMIC services; and
- fulfil legal or regulatory obligations.

Situations in which CIMIC may collect personal information include:

- recruitment and engagement of employees, including contractors;
- when receiving services from third party suppliers, including subcontractors;
- when providing services to clients or customers;
- when required by law;
- when dealing with certain government agencies;
- when visitors to CIMIC's website provide their personal information, such as name and email address; and
- during safety and operational environment monitoring (including video and two-way radio monitoring).

Personal information that may be collected includes:

- personal details, such as name, mailing address, email address, telephone numbers, age and gender;
- human resource information relating to employees including directors and officers;
- details of visitors to CIMIC premises or sites;
- applications for employment, including information relating to personal skills, work history, experience and details of performance, education, qualifications and skills, professional memberships, hobbies and affiliations;
- details of referees and personal references;

- answers to questions asked to assist CIMIC to conduct business, including as part of the employment process; and
- stated or likely individual preferences, for example an interest in receiving particular investor or marketing publications.

Personal information can be collected orally, in writing, by telephone, by e-mail, via CIMIC websites and through other methods of communication.

CIMIC generally collects personal information directly from the individual to whom it relates, except where that individual has consented to CIMIC collecting the personal information from a third party or the law otherwise permits CIMIC to do so, or where it is unreasonable or impracticable to collect it directly.

CIMIC only collects sensitive information directly from individuals with their consent, or where required, authorised or otherwise permitted to collect the information from a third party by law.

Personal information may also be collected from, and disclosed to, third parties in the course of business activities. For example, steps may be taken to verify that an individual's academic, training and professional qualifications are accurate and complete and, in appropriate circumstances due to the nature of the available position, health checks, credit checks or criminal records checks may be carried out.

An individual has the option, where lawful and practicable, not to be identified when communicating or entering into transactions with CIMIC (including by the use of a pseudonym). However, in most circumstances, it will be impracticable for CIMIC to do business with an individual or provide the services required by an individual unless personal information is provided.

2. Purposes for which we collect, hold, use and disclose personal information

Personal information will be stored in CIMIC's systems for immediate business and administration purposes, as detailed above, and may be used or disclosed for the purpose for which it was collected, or for a related purpose which someone may reasonably expect. Sensitive information will only be disclosed for a purpose which is directly related to the purpose for which it was collected.

Personal information may be disclosed between related bodies corporate within CIMIC Group worldwide, and used by those entities for the same purposes for which the collecting company is entitled to use it.

CIMIC may also disclose personal information to third party service providers and business associates, including our joint venture and alliance partners, who provide services in connection with its business. These third parties may be located locally or overseas.

3. Disclosure outside Australia

As detailed above, in some circumstances CIMIC may disclose personal information to entities located outside Australia, including to its own related bodies corporate, third party service providers and business associates.

There are certain safeguards which must be met before CIMIC is allowed to transfer personal information outside Australia, which are set out in the Privacy Act. Where personal information is disclosed overseas, all reasonable steps will be taken to ensure that the recipient will handle the information in a manner consistent with the Privacy Act.

CIMIC has operations in many countries. The entities to which personal information may be disclosed may be located in New Zealand, Papua New Guinea, Hong Kong, Singapore, India, Indonesia, Malaysia, the Philippines, southern Africa, South and North America.

CIMIC may also use or disclose personal information (including to overseas recipients):

- with the individual's consent;

- where required, authorised or permitted to do so by law; or
- to a person authorised to act on the individual's behalf.

Information may be disclosed to any person as required by law and specifically to any government agency if CIMIC believes in good faith that it must do so to comply with the law or that doing so is required to prevent, detect, investigate or remedy improper conduct potentially affecting it.

4. Confidentiality and security

CIMIC is committed to:

- safeguarding all personal information provided to CIMIC;
- ensuring that personal information remains confidential and secure; and
- taking all reasonable steps to ensure that personal privacy is respected.

CIMIC maintains physical, electronic and procedural safeguards to protect personal information from misuse, interference, unauthorised access, modification or disclosure, and loss or corruption by computer viruses and other sources of harm. Access to personal information is restricted to those employees, joint venture partners, subsidiary companies and third parties who need to know that information.

5. Accessing or correcting personal information

In most circumstances, CIMIC will make available to an individual upon their request any personal information held about them. Requests to access personal information may be made at any time. CIMIC will respond to a request within a reasonable time, and in the manner requested, unless there is a legal or administrative reason preventing CIMIC from do so. In some cases a reasonable fee may be charged for providing access.

Reasonable steps will be taken to ensure the personal information held is accurate, complete, up to date, relevant and not misleading before it is used or shared.

An individual may request that personal information be corrected or supplemented if the individual believes the information held by CIMIC is inaccurate or misleading. If CIMIC agrees, the change will be made. If CIMIC disagrees, CIMIC will advise the individual and include a notation on the record that the information's accuracy is disputed.

If personal information changes, or if an individual believes that the personal information held by CIMIC is no longer accurate or complete, the individual should contact the Privacy Officer.

6. Privacy Offer Contact Details

By email	privacyofficer@cimic.com.au
By post	The Privacy Officer, Level 25, 177 Pacific Highway, North Sydney NSW 2060 Australia

CIMIC will respond to requests to correct or supplement personal information within a reasonable time period.

7. Destruction and de-identification of personal information

Records management policies govern the archiving and destruction of records which include personal information.

If unsolicited personal information is received, reasonable steps will be taken to destroy or de-identify that personal information.

8. Use of cookies

A cookie is a small text file downloaded onto a computer or mobile device when a website is accessed, including the CIMIC website. Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the website's owners and third parties.

Cookies allow a website to recognise a computer or mobile device. Cookies do not identify the individual, but do identify the computer or mobile device used to access the Internet, and can therefore be used to collect information about the individual's use of the Internet. Cookies do not allow access to any information stored on the individual's computer or mobile device.

Cookies are used:

- to determine the number and global location of visitors to CIMIC's website and to identify how visitors move around the site and, in particular, which pages they visit. This allows CIMIC's website and services to be improved;
- to collect information, where available, about a computer or mobile device for system administration purposes, such as IP address, operating system and browser type.

Information collected through the use of cookies will only be used to evaluate CIMIC's website effectiveness and to improve user experience. Cookies are not used to identify an individual or to send targeted advertising.

9. Links to other websites

CIMIC's website provides hyperlinks to websites owned and controlled by others. CIMIC is not responsible for the privacy practices of these websites. By accessing or using CIMIC's website, an individual consents to the collection, use and disclosure of personal information as described in this Policy, as amended from time to time.

10. Complaints

If an individual has a question, concern or complaint regarding the way in which personal information is handled, or believes that CIMIC or one of its Operating Companies has breached its obligations under the Privacy Act or has failed to comply with this Policy, they should make a complaint in writing to CIMIC's Privacy Officer (contact details above).

CIMIC will review and respond to any complaint as soon as possible, and generally within 30 days of receiving it.

If an individual is not satisfied with CIMIC's response, the complaint can be referred to the Office of the Australian Information Commissioner (**OAIC**). The OAIC will generally only consider a complaint if the individual has first written to CIMIC and given CIMIC a reasonable opportunity to resolve the complaint (usually 30 days).

11. Policy Information

Owner:	Group General Counsel, CIMIC
Approved by:	Executive Chairman and Chief Executive Officer, CIMIC
Effective date:	10 August 2015 updated 18 October 2016

Note: CIMIC reviews and updates this Policy from time to time to reflect its current information handling practices. CIMIC will notify changes by posting an updated version of the Policy to the CIMIC website.