

## EMPLOYEE PRIVACY POLICY

This Employee Privacy Policy (**Policy**) applies to all employees and contractors (**Employees**) of ARA Group Limited ABN 47 074 886 561 and its related corporate entities in Australia and New Zealand (collectively **ARA Group**) and operates alongside ARA Group's Privacy Policy which may be accessed via any ARA Group website.

ARA Group is committed to protecting personal information in accordance with the *Privacy Act 1988* (Cth) (the "**Australian Privacy Act**") and *Privacy Act 2020* (NZ) (the "**NZ Privacy Act**") and endeavours to manage personal information in an open and transparent way to ensure the privacy and confidentiality of the personal information it collects is maintained. Accordingly, this Policy sets out how ARA Group collects, uses and controls personal information in the course of business.

### 1 Definition

"**Personal Information**" means information (including a document) or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not, otherwise as defined in section 6 of the Australian Privacy Act and section 7 of the NZ Privacy Act.

"**Privacy Legislations**" refers to *Privacy Act 1988* (Cth) including the Australian Privacy Principles and *Privacy Act 2020* (NZ) including the Information Privacy Principles.

### 2 Collection of Personal Information

2.1 ARA Group collects and retains various types of Personal Information for the purpose of company administration and management. The types of Personal Information collected by ARA Group includes but is not limited to Employees';

- (a) names and addresses;
- (b) contact details such as phone numbers and email addresses;
- (c) next of kin contact details;
- (d) bank account details (relevant for the purposes of salary and wages payment only);
- (e) tax file number;
- (f) superannuation and industry scheme information;
- (g) license and qualification details (relevant to the employment criteria);
- (h) employment history;
- (i) work experience; and
- (j) relevant health details and workers compensation history.

2.2 ARA Group collects Personal Information as reasonably necessary for the purpose of, or directly related to, one or more of its functions and activities and in accordance with the Privacy Legislations. ARA Group will only collect Personal Information that is:

- (a) collected by lawful and fair means;
- (b) collected with the consent of the originator; and
- (c) used for lawful purposes.

2.3 Where Personal Information is obtained from a third party, such as through publicly available sources or a referee provided by the Employee, ARA Group will obtain such information only through lawful and fair means.

2.4 ARA Group collects Personal Information upon initial engagement of the Employee. ARA Group accepts requests from Employees at any time to update any Personal Information pertinent to their Employment.

### **3 Storing Personal Information**

ARA Group provides a secure environment for the storage of Personal Information. Physical records are maintained in a secure facility with restricted access. Electronic records are retained in restricted access and secure file server directories. Data may be backed up and/or archived subject to AES 265bit encryption.

### **4 Disclosure of Personal Information**

ARA Group may disclose Personal Information; for the primary purpose for which it was collected, for reasonably expected secondary purposes, for purposes for which Employees have consented to, and for other reasons permitted by the Privacy Legislations such as where disclosure is required by law.

Employees' Personal Information may be disclosed to third parties for payroll administration.

In certain circumstances where ARA Group is contracted, for the purposes of undertaking the projects and works involved, ARA Group may disclose Employee Personal Information, such as where third parties require proof of qualifications of the persons to be working on such projects.

ARA Group will not disclose Employees' Personal Information to overseas third-party recipients unless under the direct authorisation of the Employee concerned.

### **5 Accessing and correcting Personal Information**

ARA Group endeavours to ensure the Personal Information it collects and holds is accurate and up to date. Notwithstanding this, the accuracy of Personal Information held by ARA Group depends greatly upon Employees notifying ARA Group of any changes to their Personal Information, such as when bank details are changed.

Employees have the right to request to access and correct their own Personal Information held by ARA Group by a written request to their respective manager. Corrections and/or amendments can be undertaken through the Employee's direct manager as the need arises, unless there is a law that allows or requires ARA Group to do otherwise.

ARA Group will notify you in writing and provide reasons for refusing access to, or to correct your Personal Information, if such circumstance arises.

### **6 Complaints**

Any complaints relating to a breach of this Policy or breach of the Privacy Legislations can be made in writing by emailing ARA Legal at [legal@aragroup.com.au](mailto:legal@aragroup.com.au). On receipt of a complaint, ARA Legal must investigate the incident and determine whether the breach complained of has been substantiated. If a breach has been ascertained, corrective and preventative measures must be implemented to rectify the situation as soon as practicable.

### **7 Survival**

Employees engaged by ARA Group are required to adhere to this Policy both at the onset of their employment and after the cessation of their employment (for any reason whatsoever).



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Edward Federman  
Chief Executive Officer

21 January 2026

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Date