

1 PURPOSE

- 1.1 This Privacy Policy sets out how ProGroup Management Pty Limited manages personal information in the course of its business activities.
- 1.2 ProGroup is committed to handling personal information responsibly and in accordance with applicable privacy laws.
- 1.3 This Policy explains how ProGroup collects, holds, uses, discloses, stores and protects personal information, and how individuals may request access to or correction of their personal information or make a complaint regarding the handling of that information.

2 SCOPE

- 2.1 This Policy applies to personal information collected or held by ProGroup in relation to:
 - a) clients and client representatives;
 - b) prospective clients and business leads;
 - c) suppliers, subcontractors and their representatives;
 - d) website users and individuals who submit enquiries;
 - e) job applicants, employees and contractors; and
 - f) other individuals who interact with ProGroup in the course of its business activities.
- 2.2 This Policy is subject to any exemptions or qualifications that may apply under applicable privacy law, including in relation to employee records.

3 DEFINITIONS

- 3.1 For the purpose of this Policy, **personal information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not and whether recorded in material form or not.
- 3.2 **Sensitive information** has the meaning given under applicable privacy law and may include information such as health information, racial or ethnic origin, religious beliefs, criminal record or membership of a professional or trade association.

4 EMPLOYEE RECORDS

- 4.1 Where personal information relates to a current or former employee and is directly related to the employment relationship, ProGroup may handle that information in accordance with the employee records exemption under applicable privacy law, where relevant.
- 4.2 The employee records exemption does not generally apply to prospective employees, contractors, subcontractors or other non-employees.
- 4.3 Nothing in this clause prevents ProGroup from handling employee-related personal information in accordance

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Status: Controlled	Next Review Date: 04/05/2029	Approved By: Chief Executive Officer	
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with this Policy where appropriate as a matter of good practice and governance.

5 COLLECTION OF PERSONAL INFORMATION

- 5.1 ProGroup may collect personal information that is reasonably necessary for its functions and activities.
- 5.2 The kinds of personal information ProGroup may collect include:
- a) name;
 - b) employer or business name;
 - c) job title or position;
 - d) phone number, email address and business address;
 - e) information contained in enquiries, correspondence, meetings, tenders, proposals and forms;
 - f) records of communications and dealings with ProGroup;
 - g) recruitment, employment and contractor-related information;
 - h) supplier, subcontractor and consultant information;
 - i) billing and payment-related information;
 - j) website and technology-related information, including IP address, browser type, device information and website interactions; and
 - k) marketing and engagement information, including interactions with ProGroup campaigns, events, newsletters, forms and social media content.
- 5.3 ProGroup generally collects personal information directly from the individual concerned.
- 5.4 ProGroup may also collect personal information through:
- a) phone calls, emails, meetings and written correspondence;
 - b) website enquiry forms and other online forms;
 - c) social media and business networking platforms;
 - d) recruitment processes and employment applications;
 - e) clients, referrers, suppliers, subcontractors and consultants;
 - f) publicly available sources; and
 - g) digital platforms and systems used for communication, marketing, analytics and customer relationship management.
- 5.5 This may include personal information collected through third-party platforms, including LinkedIn, where an individual chooses to submit their details, interact with ProGroup content or otherwise engage with ProGroup through that platform.
- 5.6 ProGroup does not seek to collect sensitive information unless:
- a) it is reasonably necessary for ProGroup's functions or activities;
 - b) the individual has consented; or
 - c) the collection is otherwise permitted or required by law.

6 PURPOSE OF COLLECTION

- 6.1 ProGroup may collect, hold, use and disclose personal information for purposes including:
- a) responding to enquiries and requests;
 - b) providing, managing and improving services;

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- c) preparing proposals, tenders, submissions and contracts;
- d) managing relationships with clients, suppliers, subcontractors and other stakeholders;
- e) recruitment, employment and contractor administration;
- f) verifying identity, authority, qualifications and engagement details;
- g) maintaining business, operational and administrative records;
- h) complying with legal, contractual and regulatory obligations;
- i) managing complaints, incidents, claims and disputes;
- j) business development, marketing and communications; and
- k) analysing and improving ProGroup's website, systems, communications and service delivery.

6.2 ProGroup will take reasonable steps, where appropriate, to explain why personal information is being collected and how it is intended to be used.

7 USE AND DISCLOSURE OF PERSONAL INFORMATION

7.1 ProGroup may use and disclose personal information for the primary purpose for which it was collected, for related purposes where appropriate, with consent, or where otherwise required or authorised by law.

7.2 ProGroup may disclose personal information to:

- a) clients and client representatives where relevant to the provision of services;
- b) suppliers, subcontractors, consultants and professional advisers;
- c) IT, cloud, software, website, communications, CRM, analytics and marketing service providers;
- d) recruitment, payroll, HR and related service providers;
- e) insurers, auditors, accountants and legal advisers;
- f) regulatory authorities, government bodies, courts, tribunals or law enforcement agencies; and
- g) other parties where disclosure is permitted, required or authorised by law, or where the individual has consented.

7.3 ProGroup will take reasonable steps to ensure that personal information disclosed to third parties is handled appropriately and only to the extent necessary for the relevant purpose.

8 MARKETING COMMUNICATIONS AND LEAD GENERATION

8.1 ProGroup may use personal information for business development and marketing purposes where permitted by law.

8.2 This may include personal information collected:

- a) directly from the individual;
- b) through ProGroup's website or enquiry forms;
- c) at meetings, events and other business interactions;
- d) through third-party platforms such as LinkedIn Lead Gen Forms; and
- e) through other lawful business networking, advertising or communication tools.

8.3 ProGroup may use such information to:

- a) respond to enquiries;
- b) provide information about ProGroup's services and capabilities;
- c) develop and maintain business relationships;

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- d) issue communications regarding events, updates, projects and service offerings; and
- e) support lawful lead management and conversion activities.

- 8.4 Where ProGroup uses personal information for direct marketing, it will take reasonable steps to ensure that:
- a) communications are relevant to the individual's dealings or engagement with ProGroup;
 - b) individuals are given a reasonable opportunity to opt out of future marketing communications; and
 - c) opt-out requests are actioned within a reasonable period.

9 WEBSITE, COOKIES AND ANALYTICS

9.1 ProGroup's website and digital channels may use cookies, analytics tools, pixels and similar technologies.

9.2 These technologies may be used to:

- a) understand website traffic and user behaviour;
- b) improve website functionality and user experience;
- c) measure the effectiveness of campaigns, forms and content; and
- d) support communications and marketing activities.

9.3 The information collected through these technologies may include:

- a) IP address;
- b) browser type;
- c) device information;
- d) pages viewed;
- e) referring pages;
- f) time spent on pages; and
- g) interaction events.

9.4 Individuals may generally configure their browser settings to refuse cookies or notify them when cookies are being used, although doing so may affect the functionality of some parts of the website.

10 OVERSEAS DISCLOSURE

10.1 Some of ProGroup's service providers or technology platforms may store or process personal information outside Australia.

10.2 Where ProGroup discloses personal information to overseas recipients, it will take reasonable steps to ensure that such information is handled in a manner consistent with applicable privacy obligations, unless an exception applies under law.

11 STORAGE AND SECURITY

11.1 ProGroup takes reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification and disclosure.

11.2 These steps may include:

- a) physical security measures;
- b) electronic and system access controls;
- c) password protection and multi-factor authentication where available;

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- d) secure networks and approved software platforms;
- e) restricted access to files and records;
- f) confidentiality obligations applying to staff and contractors; and
- g) secure disposal and de-identification practices where appropriate.

12 RETENTION AND DISPOSAL

- 12.1 ProGroup will retain personal information only for as long as reasonably necessary for the purpose for which it was collected, or as otherwise required by law, contract, insurance, record-keeping obligations or legitimate business needs.
- 12.2 When personal information is no longer required, ProGroup will take reasonable steps to destroy or de-identify the information, unless it is required or permitted to retain it.

13 ACCESS AND CORRECTION

- 13.1 An individual may request access to personal information ProGroup holds about them.
- 13.2 An individual may also request correction of personal information if they believe it is inaccurate, out of date, incomplete, irrelevant or misleading.
- 13.3 ProGroup may require verification of identity before responding to a request for access or correction.
- 13.4 If ProGroup is unable to provide access or make a requested correction, it will provide reasons where required by law.

14 COMPLAINTS

- 14.1 Any individual who believes that ProGroup has mishandled their personal information or breached an applicable privacy obligation may make a complaint to ProGroup.
- 14.2 Complaints should be made in writing and should provide sufficient detail to enable ProGroup to understand and investigate the issue.
- 14.3 ProGroup will review the complaint and respond within a reasonable time.
- 14.4 If the complainant is not satisfied with ProGroup's response, they may be able to refer the matter to the Office of the Australian Information Commissioner.

15 CONTACT DETAILS

- 15.1 Any request for access or correction, privacy-related enquiry, or privacy complaint should be directed to:

C/ - Human Resources Manager
 ProGroup Management Pty Limited
 Suite 1.03, 32 Delhi Rd, Macquarie Park NSW 2113
Info@pgm.com.au
 1300 761 401

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Document No.:	IMS-POL-003
Revision No.:	00
Issue Date:	04/05/2026

16 REVIEW AND AMENDMENTS

16.1 ProGroup may review and update this Policy from time to time to reflect changes in business practices, systems, legal requirements or operational needs.

16.2 The current version of this Policy will be maintained as a controlled document within the Integrated Management System and may also be made available on ProGroup’s website.

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