



Privacy Policy

1. Purpose

The purpose of this Privacy Policy is to outline how Ultimate Security Australia collects, uses, stores, discloses, and protects personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). We are committed to managing personal information in an open and transparent way and to protecting the privacy and confidentiality of individuals, including employees, contractors, clients, suppliers, and members of the public.

2. Scope

This policy applies to all personal information collected by Ultimate Security Australia in connection with:

- Employment and recruitment
- Contractor and subcontractor engagement
- Client and supplier relationships
- Security operations, including surveillance (e.g. CCTV, body-worn cameras)
- Website or digital interactions
- Incident reporting and investigations
- Any other lawful business activity involving personal information

This policy applies to all employees and representatives of the organisation.

3. Anonymity and Pseudonymity (APP 2)

Where lawful and practicable, individuals have the option of not identifying themselves or of using a pseudonym when dealing with us. However, in many cases, we may need to identify individuals to provide services or comply with legal obligations. We will inform individuals when identification is required.

4. Types of Personal Information Collected (APP 3)

We may collect the following types of personal information:

- Full name and contact details
- Date of birth
- Employment history and qualifications
- Identification documents (e.g. driver's licence, passport)
- Right-to-work documentation
- Payroll and banking details
- Superannuation information
- Emergency contact details
- Criminal history or background check information (where required by law or consented to)
- Surveillance recordings (e.g. CCTV, body-worn cameras)
- Any other information necessary for lawful business operations

We only collect sensitive information (e.g. health, biometric, criminal record data) where required by law or with the individual's consent.



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5. How Information is Collected (APP 3 & 4)

We collect personal information:

- Directly from individuals (e.g. forms, interviews, correspondence)
- Through recruitment and onboarding processes
- From referees, background checks, or government agencies (where authorised)
- From labour hire providers or subcontractors
- Through surveillance systems (with appropriate signage and notices)
- Through business interactions and service delivery

We collect information by lawful and fair means. If we receive unsolicited personal information, we will assess whether we could have collected it under APP 3. If not, and it is lawful and reasonable to do so, we will destroy or de-identify the information as soon as practicable.

6. Notification of Collection (APP 5)

At or before the time we collect personal information (or as soon as practicable afterwards), we will take reasonable steps to notify individuals of:

- Our identity and contact details
- The purpose of collection
- Any third parties to whom we may disclose the information
- Whether the information is required or authorised by law
- The consequences of not providing the information
- How individuals can access or correct their information
- How to make a complaint

7. Purpose of Collection and Use (APP 6)

We collect and use personal information for purposes including:

- Assessing job applications and verifying right to work
- Managing employment, payroll, and superannuation
- Delivering security and related services
- Managing client and supplier relationships
- Ensuring workplace health and safety
- Complying with legal and regulatory obligations
- Investigating incidents and managing risks

We will only use or disclose personal information for the purpose for which it was collected (primary purpose), or for a related secondary purpose that individuals would reasonably expect, unless consent is provided or required by law.

8. Direct Marketing (APP 7)

We will not use or disclose personal information for direct marketing purposes unless permitted by the Privacy Act. Where applicable, we will:

- Obtain consent before sending marketing communications
- Provide a simple means to opt out of receiving further marketing
- Comply with any opt-out requests promptly and free of charge
- Inform individuals of the source of their personal information upon request (unless unreasonable or impracticable)

9. Cross-Border Disclosure (APP 8)

We generally store personal information in Australia. If we need to disclose personal information to overseas recipients (e.g. cloud service providers), we will take reasonable steps to ensure those recipients do not breach the APPs. We will inform individuals of the countries involved where practicable.

10. Government Identifiers (APP 9)

We will not adopt, use, or disclose government-related identifiers (e.g. Tax File Numbers, Medicare numbers, driver's licence numbers) as our own identifiers unless required or authorised by law.

11. Data Quality (APP 10)

We take reasonable steps to ensure that the personal information we collect, use, or disclose is accurate, up to date, complete, and relevant for the purposes for which it is collected. Individuals are encouraged to notify us of any changes to their personal information.

12. Storage and Security (APP 11)

We take reasonable steps to protect personal information from:

- Misuse, interference, and loss
- Unauthorised access, modification, or disclosure

Security measures include:

- Secure electronic systems and encrypted storage
- Password protection and access controls
- Locked physical storage
- Staff training in data protection
- Regular review of security practices

When personal information is no longer required and retention is not legally required, we will securely destroy or de-identify it.

13. Access to Personal Information (APP 12)

Individuals may request access to their personal information by contacting our Privacy Officer. We will respond within a reasonable time and provide access unless an exception applies. If access is refused, we will provide written reasons and information on how to lodge a complaint.

14. Correction of Personal Information (APP 13)

Individuals may request correction of their personal information if it is inaccurate, out of date, incomplete, irrelevant, or misleading. We will take reasonable steps to correct the information and notify any third parties where appropriate.

15. Data Breaches

In the event of a data breach involving personal information that is likely to result in serious harm, we will:

- Assess the nature and scope of the breach
- Take immediate steps to contain the breach
- Notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as required under the Notifiable Data Breaches (NDB) scheme

16. Complaints

If you believe your privacy has been breached, you may lodge a complaint in writing to our Privacy Officer at:

Privacy Officer

Ultimate Security Australia
compliance@ultimatesecurity.com.au
+61 2 9311 1111
Level 2, 111 Parramatta Road, Concord, NSW 2137

We will investigate complaints promptly and confidentially. If you are not satisfied with our response, you may contact the OAIC:

Office of the Australian Information Commissioner (OAIC)
Website: www.oaic.gov.au
Phone: 1300 363 992

17. Responsibilities

All employees, contractors, and representatives must:

- Handle personal information responsibly
- Maintain confidentiality
- Comply with this policy and relevant legislation

Breaches of this policy may result in disciplinary action.



Ying Loong Lee

Chief Operating Officer

11 January 2026