

# Privacy Policy Statement

## Purpose

Phronis Consulting Pty Ltd (“Phronis”, “we”, “our”, “us”) is committed to protecting the privacy of personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

This policy explains how we collect, use, disclose and manage personal information in the course of our operations.

## What information we collect

We may collect personal information necessary to support our professional services and business operations, including:

- Name and contact details (such as email address, phone number and business address)
- Position and employer details
- Information provided in enquiries, correspondence or tender submissions
- Recruitment information, including CVs and referee details
- Contractor and supplier contact information
- Information required for project delivery and governance
- Website usage information (including analytics data and cookies)

We do not generally collect sensitive information unless required for employment-related purposes or to comply with legal obligations.

## How we collect personal information

We collect personal information through:

- Direct engagement with clients, suppliers and stakeholders
- Website enquiry forms and correspondence
- Recruitment processes
- Project and contract management systems
- Meetings, workshops and professional interactions
- Publicly available sources where appropriate

Where reasonable and practicable, we collect information directly from the individual concerned.

## Why we collect personal information

We collect and use personal information for purposes including:

- Providing engineering and advisory services
- Managing client and supplier relationships
- Supporting procurement and tender processes
- Recruiting and managing personnel
- Maintaining project governance and compliance
- Communicating about our services
- Improving our website and digital systems

We only collect personal information that is reasonably necessary for these functions.

## Disclosure of Personal Information

We may disclose personal information to:

- Clients, partners and contractors as required for project delivery
- Professional advisers (e.g. legal, financial or IT service providers)

- Technology and cloud service providers
- Regulatory bodies where required by law

Some service providers may store or process data outside Australia. Where this occurs, we take reasonable steps to ensure appropriate safeguards are in place.

We do not sell personal information.

## Data Security

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

Our security measures include:

- Controlled access to systems and information
- Use of secure cloud-based platforms
- Governance and management systems aligned with recognised standards
- Internal procedures supporting confidentiality and information security

Personal information is retained only for as long as necessary to fulfil business or legal requirements.

## Website Analytics and Cookies

Our website may use analytics tools and cookies to understand user interaction and improve performance. These tools may collect non-identifiable information such as browser type, pages visited and session duration. Users may adjust browser settings to decline cookies if preferred.

## Marketing Communications

Phronis may from time to time send communications regarding our services or industry updates. Recipients may opt out of marketing communications at any time by contacting us or using the unsubscribe mechanism provided. We do not engage in unsolicited mass marketing.

## Access and Correction

Individuals may request access to personal information we hold about them and request corrections where necessary. Requests should be made in writing using the contact details below. We will respond within a reasonable timeframe in accordance with the Privacy Act.

## Complaints

If you believe we have breached the Australian Privacy Principles, you may submit a complaint in writing. We will investigate complaints and respond promptly. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC).

## Contact

For privacy-related enquiries, access requests or complaints, please contact:

Privacy Officer  
Phronis Pty Ltd  
[enquiries@phronis.com.au](mailto:enquiries@phronis.com.au)  
Level 5, 50 McDougall Street  
PO Box 1713  
MILTON QLD 4064

A blue ink signature of Shaun Nugent, written in a cursive style.

**Shaun Nugent**  
Managing Director  
February 2026