

# Privacy Policy

Updated: 14 May 2026

# Qanstruct Privacy Policy

## About this Privacy Policy

This Privacy Policy (**Policy**) applies to Qanstruct (Aust) Pty Ltd as trustee for Qanstruct (Aust) Unit Trust and Qanstruct (Aust) Queensland Pty Ltd as trustee for the Qanstruct (Aust) Queensland Unit Trust (together “**Qanstruct**”, “**we**”, “**our**” or “**us**”).

Qanstruct is bound by the Privacy Act 1988 (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) as well as applicable state and territory health privacy laws. We are committed to protecting your privacy and understand the importance of protecting your personal information.

## Scope of this Privacy Policy

This Policy applies to Qanstruct’s handling of ‘personal information’ about people we interact with (excluding our Team Members). Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable. It includes ‘sensitive’ information, which is a subset of personal information that is information or an opinion about your racial or ethnic origin, political opinions, philosophical or religious beliefs and affiliations, trade union membership or associations, sexual orientation, criminal record, your health or genetic information and your biometric information.

This Policy outlines the types of personal information that we usually collect and about whom, the purposes for which we collect it, to whom we usually disclose it, how we hold and keep it secure and your rights in relation to your personal information, including how to complain and how we deal with privacy complaints.

## Dealing with us anonymously or using a pseudonym

When interacting with us, you can choose not to identify yourself or to use a pseudonym unless we are required to identify you or it is not practicable to interact with you. In most situations, we will need your personal information.

## Types of personal information we usually collect

We only collect personal information about you that is reasonably necessary to operate our business in Australia as a national construction company, including delivering our products and services and complying with our legal and regulatory obligations. The types of personal information we usually collect depends on who you are and the nature of your dealings with us. If you are a:

### **Subcontractor, consultant or supplier**

We collect your:

- **Identity and contact details:** name, business name (if an individual), address, phone number, email address, date of birth, emergency contact details, gender, whether you have Aboriginal or Torres Strait Islander descent, vehicle registration and driver’s licence details (where it is a security requirement for the relevant project being undertaken)
- **Professional and licensing information:** construction certificates, trade qualifications, licences, insurances and accreditations (such as White Card details)
- **Payment and invoicing information:** bank account details, ABN (if an individual) and where permitted by law, Tax File Numbers
- **Site access and compliance information:** induction records, safety training, permits, site entry and exit records (including swipe card or sign-in / sign-out logs)

- Operational communications: emails, meeting notes and site-related communications, complaints, investigations and inspection data.

#### **Client**

We collect your:

- Business contact information: name, position, work email address and phone number
- Communications records: emails, meeting notes, instructions and approvals
- Billing and commercial information: contact details included in contracts, invoices or related document.

#### **Site visitor (including an inspector, job candidate, auditor, client or other invitees)**

Depending on the nature of your visit to the site, we may collect your:

- Identification information: name, employer details and your role and reason for visiting the site
- Site access records: sign-in and sign-out details, visitor badges (if applicable), purpose of visit and host details
- Health and safety information: site induction acknowledgements
- CCTV footage: images and video captured at and around our worksites and office entry points
- Incident or complaint records: if these are relevant.

#### **Job applicant and candidate**

We collect your:

- Applicant information: name, contact details (including phone number, email address and home address), resumes, cover letters, employment history and qualifications
- Referee and background information: referee details and, where permitted by law, right-to-work or criminal history checks.

#### **Website visitor**

We collect your contact details if you choose to provide when submitting an enquiry or form through our website.

## **How do we collect your personal information?**

We may collect personal information from or about you in different ways and from a number of sources, including:

- From you directly when you interact with us, such as through job applications, a resume you submit, contracts, forms, when you visit one of our sites, your system usage or when you engage with us online; and
- Through business interactions and communications, such as through email and phone communications, contracts, correspondence, meetings or invoices.

Sometimes we collect personal information from third parties or publicly available sources, if we have your consent (if required) or if it is reasonably expected and fair to do so. For example, we collect personal information from your job referees or recruitment agencies or academic and training organisations where required to verify your educational or qualification status.

## **For what purposes do we collect, hold and disclose your personal information?**

We collect, hold, use and disclose personal information to operate our business, deliver our services and meet our legal and regulatory obligations. This includes the following activities:

- **Engage and manage subcontractors, consultants and suppliers**, including contract formation and administration, scope and performance management, payments, verifying qualifications, licences and insurances
- **Deliver projects**, including client communications, project management, relationship engagement, billing, invoicing and commercial management
- **Manage sites and facilities**, including site access, entry and exit processes, security monitoring and safety compliance
- **Meet work health and safety (WHS) and security requirements**, including incident investigations, safety reporting and compliance with 'Principal Contractor' requirements
- **Comply with legal and regulatory obligations**, including relating to employment and industrial relations, WHS, taxation, superannuation, audit, record-keeping, regulatory reporting and evidentiary records
- **Support workforce capability**, including training, accreditation and professional development
- **Manage legal and compliance matters**, including audits, dispute resolution, investigations, legal claims and enforcement
- **Improve our services and operations**, including quality assurance, internal reporting, project reviews, data analytics and business improvement initiatives.

## Who do we disclose your personal information to and why?

Personal information may be shared within Qanstruct for the purposes described in this Policy.

We may also disclose personal information to our third-party service providers and vendors who perform services for us or on our behalf, including for business operations, administration and compliance. These may include:

- IT, cloud-based and data-hosting providers, user account management and data back-up services
- Payroll, human resources and business / project delivery platforms
- Security, access-control and site management providers
- Project management, document management, procurement and financial platforms
- Professional advisers and service providers, including lawyers, auditors, data analysts, insurers, payment processors and collections service providers.

Some of these third-party service providers may store or process personal information using systems or infrastructure located outside Australia. Where this occurs, we take reasonable steps to ensure that personal information is handled consistently with this Policy and applicable Australian privacy laws.

We may also disclose personal information to our insurance broker, insurers and claims-related parties, such as workers' compensation insurers, for managing workplace injuries and claims and to training and accreditation bodies (including White Card providers) to verify qualifications and compliance.

We may also disclose your personal information to others outside of Qanstruct where:

- We are required or authorised by applicable Australian laws or legal process to do so;
- You would reasonably expect us to disclose the information for the relevant related purpose;
- You have requested us to or expressly consented to the disclosure, or we may reasonably infer the consent from the circumstances; or

- We are otherwise permitted to disclose the information under an exception in the applicable laws.

If the ownership or control of all or part of Qanstruct changes, we may transfer your personal information to the new owner.

## How do we hold and store personal information?

We store your personal information in hard copy and electronically in Australia. We take reasonable and appropriate steps (including organisational and technological measures) to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

## Access to and correction of your information

We will endeavour to ensure that the personal information collected from you is up to date, accurate and complete. You may request access to, or correction of, the personal information we hold about you at any time by contacting us using the details set out below.

Our desire is to address any concerns you may have as quickly as is reasonably possible. We will need to verify your identity before responding to your request. Subject to any applicable exceptions or requirements, we will provide you with access to the personal information you request within a reasonable time and usually within 10 business days. If we decide to refuse your request, we will tell you why in writing and how to complain.

## Complaints and how to contact us

### Directly with Qanstruct

If you wish to contact us with a privacy enquiry or concern, exercise your privacy rights or you wish to complain about the way we have handled your personal information, you can contact us using the details below:

- Contact: Business Manager
- Telephone: (03) 9810 8300
- Email: Compliance@qanstruct.com.au
- Postal address: 87 High Street, Kew VIC 3101

We will consider any complaint you have and aim to resolve it and notify you of the outcome of our investigation and the steps we are taking to resolve it.

### With Qanstruct's Whistleblowing Service

Alternatively, you can make use of our independently managed whistleblowing service, Your Call, which can be accessed:

- Online, 24/7 at <http://www.yourcall.com.au/Qanstruct>; or
- By calling 1300 790 228, 7am to midnight, on Business Days.

Your Call is a 24/7 external intermediary service, acting as the conduit between you and Qanstruct. Your Call's Disclosure Officers will firstly receive your report, review and then confidentially share with the Nominated Officers at Qanstruct. If you choose to remain anonymous, Your Call may assist to retain your anonymity by redacting certain information.

After submitting a report, Your Call's ongoing role is to act as a conduit for the secure and confidential communications between you and Qanstruct, even if anonymous, via the online Reporter Portal.

You can choose to remain fully anonymous, share your details with Your Call only or decide to share your contact details with both Your Call and Qanstruct.

#### **Office of the Australian Information Commissioner (OAIC)**

If you are not satisfied with the outcome, you can contact the OAIC via [www.oaic.gov.au](http://www.oaic.gov.au) and raise your complaint with them.

## **Changes to this Policy**

We may need to update this Policy from time to time to reflect changes to the way we handle personal information or to the types of personal information we collect and process or to meet our legal obligations. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy from our website (<http://www.qanstruct.com.au/>) or by contacting us at the contact details above.

This privacy policy was last updated: **14 May 2026**