

Privacy Policy

Purpose

This Policy is designed to provide you with the information necessary to understand the data that **PMB Defence Group** ABN 20 099 904 926 of 715 Mersey Road North, Osborne SA 5017, along with our subsidiaries and associated companies (referred to as the “Group”, “PMB” “we,” “our,” or “us”), may hold about you.

PMB is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We are subject to the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act) and the General Data Protection Regulation (GDPR) (EU) 2016/679, which also form the basis for the UK’s privacy regulations. These privacy regulations govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/> and the EU GDPR may be obtained at <https://gdpr-info.eu/>.

The Policy outlines the categories of information we may collect or process, details how your information may be handled, and explains the measures we take to protect your privacy throughout our relationship with you.

This Policy aims to fulfill our obligations to inform you about the PMB's processing of your information, in compliance with Australian privacy laws and the General Data Protection Regulations (GDPR) concerning information related to individuals in the European Union (EU).

This Policy should be considered considering affiliated policies and regulatory matters (if any) such as use of emails, Spam Act, and our Information Technology T&Cs. These policies or regulatory frameworks may not directly deal with 'Personal Information' as defined in the Act but further govern or define PMB’s uses of data that may incidentally include Personal Information.

You consent to us collecting, holding, using and disclosing your Personal Information in accordance with this policy.

We take your privacy rights and our legal responsibilities very seriously. Your information will be handled securely and confidentially, in accordance with the details outlined in this Policy.

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The Policy is organized into sections that correspond to the specific type of relationship you have with PMB. Each section provides information on how we manage data in relation to the different types of interactions we may have with you. Please make sure to review the information thoroughly, as they will be relevant to you regardless of our relationship.

Not all sections of the Policy will be applicable to everyone. The Policy aims to provide a comprehensive overview of all processing activities we undertake; however, the mere inclusion of an activity in this Policy does not imply that we are processing your information in that manner or for those purposes.

If you have any questions about how this information applies to you, please contact us using the contact details appearing in the Contact Us section.

What Is This Policy About?

This Policy outlines how we collect and use your information across various situations, based on our relationship(s) with you. The information in this Policy is important; it outlines the methods we use to collect, hold, use, manage and disclose your information as it arises over time.

It specifies whether we are likely to disclose your information outside of Australia and/or the EU. Additionally, it outlines your rights concerning your information, the process for requesting access to your information, and the steps to take if you wish to make a complaint.

You can find more information about the specific types of information we collect and the reasons for collecting that information in the other sections of this Policy, which pertain to the relationship we have with you.

What is Personal Information?

Personal Information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be Personal Information regardless of whether it is true. Examples of Personal Information we collect includes names, addresses, email addresses, phone and facsimile numbers.

What Personal Information Do We Collect and Hold?

The Personal Information collected and used by PMB can be provided or used electronically or by conventional methods and the principles of protection outlined in this Policy apply equally to all information mediums.

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Business is all about communication and so we collect the Personal Information of individuals from our websites, applications for employment, our servers (emails) and other electronic means like telecommunication facilities. We also collect it through other methods, including but not limited to exchange of business cards, referrals from other individuals, conferences and seminars.

We collect information about you and your interactions with us. Depending on the nature of our relationship with you, the information we collect from you may include your identity and contact details, your details of enquiries, interactions, conversations, applications or complaints you make.

In most cases, the information collected and used by PMB will only include your name and your business title or position, your business email addresses and mobile phone number. In some cases, we may require additional information for legal compliance purposes, such as your birthdate and place, home and work addresses, personal mobile telephone numbers or direct landline numbers, health and wellbeing (including medical records), criminal history, reference checks, country of birth and other Personal Information.

Privacy is our ability to protect our Personal Information including being able to control who can see or use information about us.

Examples of Personal Information collected by us could include:

- Personal Information provided by an individual in response to a request, direction or order.
- Personal Information about an individual provided by another entity in response to a request, direction, order or arrangement for sharing or transferring information between both entities.
- Personal Information provided at a business meeting, where it relates to the subject matter of the meeting, including business cards exchanged at the meeting.
- A completed form or application submitted by an individual.
- A record of a credit card payment.
- Video footage that identifies individuals.
- An employment application sent in response to either a job advertisement published by an entity or an expression of interest register maintained by the entity.

Personal Information is information that says who we are, what we do and what we believe. Names, addresses, phone numbers, email addresses, photos, bank account details, tax file numbers, super fund information, drivers licence details and academic records are a few examples.

Personal Information can be sensitive in nature, for example, information about a person's health, racial or ethnic origin, sexuality, religious beliefs, criminal record, professional or trade union memberships. This kind of Personal Information is known as sensitive Personal Information.

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Most of the Personal Information about individuals that we collect in whatever form and from whatever source, is used only so that we can that we can communicate more effectively and efficiently with them, and numerous clients, contractors, government departments and agencies in the performance of our contractual or legal obligations.

In every mode of collection or use, we follow the guidelines and rules laid down by the Australian Privacy Principles. Our compliance procedures can be overridden by legal process - law enforcement, regulatory intervention, and emergency health or safety issues all take priority to our protocols and procedures.

When we collect Personal Information, we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

How and Why do we Collect and Use your Personal Information?

We will collect your Personal Information directly from you whenever you interact with us. The Personal Information we may solicit and collect directly from you or from another entity about you is only the information that is *reasonably necessary* for us for our business operations, functions or activities, or to comply with our legal obligations.

How Do We Collect Information?

Personal Information is obtained in many ways, and in most cases, we receive information directly from you. You provide this information at the beginning of our relationship or at another time during your interactions with us.

We collect the information in numerous ways – telephone, internet, email, and written correspondence. This includes information you input into a form, application, pre-employment screening, as well as information you share with the Human Resources team, via your PMB contact, any member of our workforce, or one of agents providing these services on our behalf.

Information may be disclosed during interviews, meetings, correspondence, by telephone and facsimile, by email, from our websites (www.pmbdefence.com.au, and www.pmbbt.co.uk) from your website, from media and publications, from other publicly available sources, from government security agencies and other government agencies, legal and compliance documents, whistleblower records, and from third parties including, but not limited to Government departments, recruitment agencies and health care providers or services. We do not guarantee website links or policy of authorised third parties.

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Other sources of collection of that Personal Information may include -

- Registration forms, invitations and expressions of interest forms for briefings, interest groups, training courses.
- Supplier registration forms and/or audit documents.
- Membership applications, notices, invoices and order forms.
- Forms and notices for statutory compliance purposes (such as consents to act).
- Surveys and questionnaires.
- Project and consultancy proposals and contracts for services.
- Telephone enquiries to our offices.
- Email broadcasts.
- Business cards.
- Publicly available directories and publications.

In addition to the information, you provide to us, we may generate further information internally. In some circumstances, data may be collected indirectly through monitoring devices or other means, such as building and location access control systems, CCTV, telephone logs and recordings, and email and Internet access logs, if permitted by applicable laws. In these cases, the data may be collected by us or a third-party provider of the relevant service on our behalf.

How Do We Collect Information from Third Parties?

We may also obtain some information from third parties. If you are a representative of a supplier or a customer, we may receive your information directly from that company or from your colleagues.

Additionally, we may engage third parties to conduct credit-worthiness, anti-money laundering, anti-bribery and corruption, and other due diligence checks. We process credit-related information and credit-eligibility information about individuals in accordance with our Credit Reporting Policy.

We may also collect information from third parties such as former employers, pre-employment screening agencies, health services, training organisations, and referral services.

Where you provide us with Personal Information about someone else, you must ensure you have that individual's consent to giving it to us, especially if it is an employee or contractor to you.

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Why Do We Collect, Hold and Use Information?

We collect, hold and use your Personal Information so that we can:

- a) Provide you with products and services and manage our relationship with you;
- b) Procure your products and services and manage our relationship with you;
- c) Contact you, for example, to respond to your queries or complaints, or if we need to tell you something important;
- d) Comply with our legal obligations and assist government and law enforcement agencies or regulators; or
- e) Identify and tell you about other products or services that we think may be of interest to you.

We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

Right to Anonymity

You have the option to anonymity in your dealings with us, for example, when making a disclosure under the Whistle Blower Policy. However, please be aware that this may affect our ability to effectively conduct our relationship and provide you with the necessary services or support.

In addition, if you choose to withhold specific information, we may not be able to maintain our relationship with you if we believe that the relevant information is necessary for the effective and efficient administration and management of that relationship.

For instance, we need Employee information to process pay, this includes identity information, contact details, payroll information, and your Tax File Number. If this information is not provided, we may be unable to effectively manage our contractual employment relationship.

For suppliers or customers, if we do not have your identity and contact information, we will be unable to communicate with you regarding the relevant commercial transaction between PMB and that supplier or customer.

Disclosure of Personal Information

We may process your information without your knowledge or consent, in accordance with the details outlined in this Policy, when this is required or permitted by applicable law.

We may amend the content of this Policy from time to time to ensure it remains up to date with current legislative and legal requirements and to ensure it reflects the way we operate our business.

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Internal Disclosure

Within PMB, your information can be accessed or disclosed internally on a need-to-know basis, including the transfer or disclose your Personal Information to our related companies. The subsequent use or disclosure of your Personal Information by our related companies will be based on the primary purpose for which that information was collected unless an exception to this principle applies, such as a disclosure for enforcement related activity or to establish, exercise or defend a legal claim.¹

We will only disclose sensitive Personal Information to our related bodies corporate for the primary purpose of its collection or a directly related secondary purpose, such as maintaining personnel records relevant to our Workplace Health and Safety obligations. We will only use or disclose your information for the purposes for which we collected it, unless we:

- Reasonably believe that we need to use it for another reason that is related to the original purpose.
- Are required or authorised by law, a court or tribunal, or for law enforcement purposes to use or disclose your information.
- Establishing, exercising, or defending against a legal claim.
- Obtain your consent to use it for another purpose.
- Are protecting life, health, or safety.
- Responding to allegations of unlawful activity or serious misconduct.
- Participating in a confidential Alternative Dispute Resolution process, such as mediation.

Internal Recipients

Internal recipients of your information may include:

- Local and global departments, including line management and team members.
- Staff in teams such as the HR, Finance, Security, Administration and Safety departments (whether local or global) as necessary for the performance of specific tasks or system maintenance or other relevant teams (whether local or global) as necessary for specific projects and assignments.
- Local and executive management responsible for managing or making decisions related to your relationship with PMB or involved in processes concerning your relationship with PMB.
- Information Technology and System Administrators (both locally and globally).
- Internal audit personnel providing assurance to the Group's Audit Requirements to assess PMB's internal controls.

¹ The relevant exceptions can all be seen in [APP 6](#)

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External Disclosure

We may disclose Personal Information to external service providers so that they may perform services for us or on our behalf. Your information may be accessed by third parties, including suppliers, recruitment agencies, advisers, national authorities, and government bodies, which may be located in Australia or overseas. We have made an effort to identify these parties in this Policy.

We may also disclose your Personal Information to others outside our group of companies where:

- a) We are required or authorised by law to do so;
- b) You may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- c) We are otherwise permitted to disclose the information under the Privacy Act.

In addition, there are circumstances where we may need to disclose your information to third parties to help manage our business and deliver our services. We may disclose your information to third parties if:

- We sell or buy any business; in which case we may disclose your Personal Information to the prospective seller or buyer of such business.
- The Group or its assets are acquired by a third party, in which case Personal Information held by us about you will be transferred to that third party.
- If the ownership or control of all or part of our business changes, we may transfer your Personal Information to the new owner.
- We are under a duty to disclose or share your Personal Information to comply with any legal or regulatory obligation, or to enforce or apply our legal rights. In such cases, we may share your Personal Information with our regulators and law enforcement agencies in Australia and around the world, or with our legal advisers.
- It is necessary to protect the rights, property, or safety of the Group or any member of the Group of companies, our customers, suppliers, or others. In this case, we may disclose your Personal Information to our legal advisers and other professional services firms.
- Third parties provide services to us connected with your relationship with us.

In some instances, these third parties (or others, such as a benefits providers) carry out their tasks on our behalf and upon our instructions for the reasons outlined in this Policy. In this case, your information will only be disclosed to these parties to the extent necessary to provide the required services.

Disclosure to other third persons could include regulatory and other government agencies connected with the subject matter of our dealings with you, to our customers or their agents or representatives, or to contracted service providers who are undertaking a service on our behalf.

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External Recipients

External recipients of your information may include:

- Service providers.
- Recruitment Agencies.
- Unions.
- Health care providers.
- AGSVA.
- Tax authorities.
- Regulatory authorities.
- Our insurers.
- Bankers.
- External IT administrators.
- Lawyers.
- Auditors.
- Investors.
- Consultants and other professional advisors.
- Payroll and Timesheet providers.
- Administrators of our benefits programs.
- Administrators of our Engagement, Perform and Develop programs.
- Employee Assistance Program providers.
- Our customers.
- Our travel coordinators.

Information contained in our IT systems may be accessible by providers of those systems, their associated companies, and subcontractors, such as those involved with hosting, supporting, and maintaining the framework of our finance information systems, QHSE systems, intranet and websites.

We require these third parties to process any information provided to them in accordance with the contractual relationship we have with them and applicable law, including adherence to data confidentiality and security standards.

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Foreign Disclosure

Your dealings with us may involve the transfer of your Personal Information overseas. This will typically occur when you have directly requested it such as for trade missions, travel documentation, export or import documentation and international introductions or referrals. Your Personal Information may be disclosed to foreign recipients in a number of circumstances including the following:

- Where you consent to the use or disclosure; or
- Where the recipient is legally obliged to comply with the Australian Privacy Principles; or
- Where the recipient is subject to substantially similar privacy obligations; or
- Where required or authorised by law.

PMB will not be obliged to ensure that the foreign recipient will handle your information in accordance with the Australian Privacy Principles if you have expressly consented to our disclosure of your Personal Information whilst understanding that the foreign entity will not be bound by the Australian Privacy Principles and you will not be able to take action against them under Australia's Privacy Act.

In some circumstances, we may also need to transfer your Personal Information overseas to our foreign customers or their representatives; or foreign entities or individuals acting on PMB's behalf. Such disclosures will relate to the primary business purpose for which we have collected the Personal Information and will typically be made to foreign entities bound by the General Data Protection Regulation (EU) 2016/679 or other privacy regulations akin to the Australian Privacy Principles.

PMB's contracts with our foreign customers impose legally binding confidentiality obligations on both parties. PMB will also seek to impose legally binding obligations equivalent to the Australian Privacy Principles or the EU GDPR on any of our foreign representatives who may need to handle Personal Information on PMB's behalf.

Third Party Information

Apart from information relating to you, you may also provide us with information about third parties, such as your family, dependents, or colleagues. In such cases, we have outlined the relevant details in this Policy to ensure transparency and compliance with privacy standards.

Before you provide information about others to us, you must first inform these individuals that you intend to share their details with us and explain the processing that will be carried out by us, as detailed in this Policy. This ensures that they are aware of how their information will be used and processed.

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Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

We may collect sensitive information in these scenarios:

- You give us consent to collect your sensitive information, and it is reasonably necessary for us to perform one of our functions or activities.
- We are authorized or required to collect your sensitive information by law or by a court/tribunal order.
- A permitted general situation applies.
- A permitted health situation applies.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained.
- For a secondary purpose that is directly related to the primary purpose.
- With your consent or where required or authorised by law.

Permitted health situations relevant to us may include:

- Providing a health service to you, including ongoing health monitoring and rehabilitation, including work injuries and returning to work, as outlined in the Return-to-Work Act.
- Collecting or using/disclosing information for the purposes of compiling or analysing statistics, and/or managing the provision of a health service.
- Disclosing information to a person who is responsible for you, such as your caregiver.

We may have to ask for *sensitive information* such as affiliation or membership of a union, or health status (including as may be applicable, COVID-19 vaccination status), and background in the context of employment and regulatory advice provided as part of our primary purpose.

Sensitive information is treated separately and more confidentially and is destroyed as soon as it is no longer needed for the purpose. We may require your written consent to the disclosure of information that contains sensitive information if such disclosure is required.

PMB has implemented security measures such as restricted access to limited approved parties. These are employed to secure Personal Information we hold as and when required, for example in the case of sensitive information for employment purposes.

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How Do We Store, Secure, Retain and Dispose of Personal Information?

PMB is dedicated to safeguarding the security of the information you share with us or that we process about you. To support this commitment, we have implemented appropriate technical, physical, and organizational measures to ensure a level of security that is suitable for the associated risks.

Storage and Security of Information

We store most information about you in computer systems and databases operated by PMB or our external service providers.

Some information about you may also be recorded in paper files that we store securely. We implement and maintain these processes and security measures to protect Personal Information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

These processes and systems include:

- a) The use of identity and access management technologies to control access to our physical locations and electronic systems used to process and store information;
- b) Requiring all employees to comply with internal information security policies and keep information secure; and
- c) Monitoring and regularly reviewing the organisation's practise against our own policies and against industry best practice.

While most of our data is presently residing in datacentres in Australia, there may be times when, due to the nature of the transaction you seek with us or the communication facility used, your data is available to overseas recipients. The purpose of these sorts of disclosures are for software solutions, help desk support or for simply storage purposes through contracted service providers or facilities we use that include cloud options.

By using our telecommunication facilities and specifically internet access, you will be consenting to the possibility of the data we collect for the service transaction or relationship being disclosed overseas and to unknown destinations. This covers those cases where we are simply undertaking normal business activity.

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Retention Of Information

We will retain your information for as long as is reasonably necessary for the purposes explained in this Policy. In some circumstances, we may retain your information for longer periods than necessary for the purposes described in this Policy, such as:

- When the original purpose is no longer relevant, but a related secondary purpose still exists.
- When required to do so in accordance with legal, regulatory, tax, or accounting requirements.
- To ensure that we have an accurate record of your dealings with us in the event of any complaints or challenges.
- If we reasonably believe there is a prospect of litigation related to your relationship with us.

We maintain policies governing the creation, retention, and disposal of records in our care. These policies outline our requirements for record management, including guidance on:

- Keeping information as current as possible.
- Securely deleting records and removing irrelevant or excessive data.
- Storing information anonymously or in a manner that no longer identifies you.

Disposal Of Information

Most of the Personal Information is or will be stored in files which will be kept by us for a minimum of 7 years following the cessation of your relationship with PMB. When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information.

Access To Your Personal Information

You may request access to the Personal Information that we hold about you by contacting us, in writing, at our contact details set out below. PMB will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

We will need to satisfy ourselves that such a request is being made by your or your authorised guardian or agent and may require you to provide evidence of your identity. There are some circumstances in which we are not required to give you access to your Personal Information, details of those exceptions can be found in the [APP guidelines](#).

There is no charge for requesting access to your Personal Information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

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We will respond to your requests to access or correct Personal Information in a reasonable time and will take all reasonable steps to ensure that the Personal Information we hold about you remains accurate, up to date and complete. If we refuse your request to access or correct your Personal Information, we will provide you with written reasons for our refusal.

Maintaining The Quality of Your Personal Information

It is an important to us that your Personal Information is accurate and up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up to date.

You also have a responsibility to notify PMB of any changes to your information as soon as possible, If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable, in writing, so we can update our records and ensure we can continue to provide quality services to you.

You have the right to request that we correct any inaccurate information. Before making corrections, we may seek to verify the accuracy of the information you provide. This process ensures that we maintain accurate and reliable records.

Please note that we do not always need to comply with your requests. If we are unable to fulfill your request, we will provide you with a written explanation outlining the reasons for our decision. This ensures transparency in our communication with you.

If we correct your information, you have the right to request that we notify any third parties to whom we have disclosed your information about the correction. This ensures that all relevant parties have accurate and up-to-date information.

PMB will not charge a fee to process your request. However, we may impose a reasonable fee to cover administrative costs associated with facilitating access to your information. This ensures that we can effectively manage requests while maintaining service quality.

We will endeavour to respond to all valid requests within 30 days. However, if the request is particularly complicated or if you have submitted multiple requests, it may take us longer to respond.

We will make an effort to inform you if we anticipate that our response will exceed 30 days. To help expedite our response, we may ask you for more details about what you would like to receive or any specific concerns you may have. Your cooperation is appreciated as it aids in our ability to assist you effectively.

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There may be instances where we are unable to fully address your request. This could occur if fulfilling the request would impact our duty of confidentiality to others or if we are legally obligated to handle the request in a different manner. We appreciate your understanding in such situations, as our priority is to comply with applicable laws and protect the rights of all parties involved.

How Do I Make a Complaint?

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your Personal Information, you should contact us. Our contact details are set out below.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation in writing within a reasonable timeframe, typically within 30 days.

If you are unsatisfied with PMB's response you may refer your complaint to the Office of the Australian Information Commissioner ("OAIC"), further information about the process of lodging a complaint with the OAIC can be found [here](#).

How Do I Contact You for More Information?

If you have any queries or complaints about our Privacy Policy, please contact us at:

Address: 715 Mersey Road North Osborne SA 5017
Email: enquiries@pmbdefence.com.au
Phone: 08 7077 5500

Policy Updates

This Policy may change from time to time and is available on our website. Any changes to our policy will be published on our intranet and website.

You may obtain a copy of our current policy from our website or by contacting us at the contact details above.