

# PRIVACY POLICY - SUBCONTRACTORS

## Background

Service Stream Limited and its subsidiaries (“**Service Stream**”, “**we**”, “**us**” or “**our**”) consider that the responsible handling of personal information is a key aspect of good corporate governance and we are strongly committed to protecting an individual's right to privacy. Service Stream is subject to the *Privacy Act 1988* (Cth) (“**Act**”) and the Australian Privacy Principles (“**APPs**”) (collectively “**Privacy Laws**”), which establish protective standards for the management of personal information.

This policy describes the way that Service Stream collects, holds and discloses personal information relating to its large subcontractor workforce and the controls it has imposed to ensure compliance with the Privacy Laws.

This policy is to be read in conjunction with Service Stream’s general privacy policy which describes how Service Stream collects, holds and discloses personal information relating to people other than subcontractors, such as employees, customers’ and suppliers’ representatives and our client’s customers. It can be accessed [here](#).

In this policy the terms "personal Information" and "sensitive information" bear their meanings defined in the Privacy Laws, but in substance, "personal information" refers to information about or related to an identifiable individual, while "sensitive information" is personal information about the relevant individual which is subject to additional controls. It includes details such as ethnic origin, political and religious affiliations, criminal histories and health information. In the context of this policy a reference to personal or sensitive information means information of the types described in section 2.

## 2. The information we collect

During the course of carrying on our business, we collect personal information about individual employees of our corporate subcontractors (“**Sub-employees**”) and sole traders. This information includes but is not limited to:

- name, address, phone numbers and email addresses
- date of birth
- next of kin contact
- company reports from authorised credit reporting bodies that hold public record information about company directors
- Working with Children records
- evidence of Right to Work in Australia (e.g. visa information, birth certificate, citizenship certificate, driver’s licence, passport)

If required and relevant to our business or the work you or your Sub-employees may work on our behalf, we may collect sensitive information, including:

- health information (for example, for Asbestos Health Assessments, or Drug & Alcohol testing)
- criminal records
- membership of a trade association (for example, Cabler’s licence, electrical worker’s licence)

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### 3. How we collect information

The nature of onboarding our subcontractor workforce means that it is not always practicable to collect personal information directly from the individual to whom it relates. To onboard a corporate subcontractor with multiple Sub-employees we will collect and use personal information from publicly available sources and from that Sub-employee’s authorised representative (i.e. employer).

We hold this information using third party IT systems that are subject to strict security and contractual controls, as explained below.

In all situations where we obtain personal information from a third party, including any of our subcontractors, we are careful to seek confirmation from those providing us with the information that it was acquired in accordance with the requirements of the Privacy Laws, that they are entitled to provide it to us and that they are able to authorise us to use it for the purposes for which they are supplying it. If the information is sensitive, such as a criminal record, we will take steps to confirm that authorisation includes the informed consent of the individual concerned.

It is not practicable for us to deal with subcontractors who have not identified themselves or their Sub-employees or who have used a pseudonym. One reason among many is that we need to be satisfied our workforce is appropriately licensed and accredited at law for the work we engage them on behalf of our clients. You may choose not to provide us with personal information but it may mean that you are not deemed by us as qualified or compliant to work as a contractor to Service Stream.

### 4. How we use the information we collect

Service Stream uses the personal information it collects from its subcontractors:

- to ensure its workforce is lawfully licensed and accredited for the works it will perform to the requirements and standards of Service Stream and its clients;
- to ensure its workforce has the Right to Work in Australia;
- to provide services to our clients, for example by scheduling jobs;
- to communicate occupational health and safety requirements, training and other communications and updates relevant to the work; and
- other related purposes.

We do not sell personal information to third parties.

### 5. Disclosure of personal information

Service Stream will disclose personal information it collects from its subcontractors to third parties in connection with the manner in which we collect that information and for the purposes described in section 4, including to:

- the provider of the IT platform used by us to host our workforce management database;
- our clients;
- utility companies, local councils and other public agencies in connection with obtaining necessary approvals to carry out works;
- relevant regulatory agencies (i.e. police checks / Working with Children)
- IT systems used for back office functions e.g. scheduling jobs, invoicing and billing.

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In addition, Service Stream may engage third parties on an ad hoc basis to act on our behalf, such as: Information technology suppliers, debt collection agencies, and professional advisors. We may disclose personal information we have collected to these third parties for the purposes of their work and, equally, they may provide us with personal information they have collected from you in the course of providing the relevant products or services.

If Service Stream intends to disclose any personal information it collects from its subcontractors in any other manner than those contemplated in the preceding parts of this section 5, we will inform you at the time the information is collected. Otherwise Service Stream will only disclose the personal information it collects where required or authorised to do so by Australian law.

Service Stream is not likely to disclose personal information of the types described in section 2 of this policy to overseas recipients. Service Stream will not disclose any personal information it collects to any person located outside Australia unless:

- (a) we have obtained the consent of the person to whom the information relates to that disclosure;
- (b) the overseas recipient is subject to a law or binding scheme, that provides at least a substantially similar level of protection in respect of the use of personal information to that available under Australian law and the person to whom the information relates is directly able to enforce their rights in respect of that protection; or
- (c) the disclosure is otherwise in compliance with our obligations under the Privacy Act.

## 6. Security

We take reasonable steps to ensure all personal information we hold is kept secure from unauthorised access, modification or disclosure. These steps will be a combination of IT security controls, such as using trusted SSL certificates and data encryption, and physical security controls, such as restricted secure access and world class data centres. We also ensure third parties to whom we disclose personal information are subject to contractual controls, where possible.

Service Stream is required to notify the Australian Information Commissioner and all affected individuals if it experiences an eligible data breach that is likely to result in serious harm. If you see or experience a data breach involving a Service Stream employee, subcontractor or service provider, please report it without delay to Service Stream's Privacy Officer (details in Section 7 below).

## 7. Access and Contact Details

If you wish to obtain a copy of any personal information we hold which relates to you, request that we correct that information, request that we delete that information or make a complaint relating to our collection or use of personal information, please contact Service Stream's Privacy Officer at [privacyofficer@servicestream.com.au](mailto:privacyofficer@servicestream.com.au) or by post at: **The Privacy Officer, Service Stream Limited, PO Box 14570, Melbourne Vic 8001**. Please note that we will require you to adequately identify yourself when requesting a copy of your personal information. We aim to respond to any complaint within 30 days and act reasonably in resolving all complaints.

If you are unsatisfied with the response from Service Stream, you may wish to address your complaint to the Australian Information Commissioner at: Office of Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001, email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

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