

# PRIVACY OF PERSONAL INFORMATION POLICY

Policy Number: PER 010 Rev 1

# 1. PURPOSE

The RPC group of companies (RPC) are committed to ensuring the privacy of your personal information. This document sets out RPC's privacy obligations to you and how we manage your personal information in accordance with privacy and data protection laws applicable in Australia, Indonesia and Singapore.

#### 2. OVERVIEW

At RPC, protecting your privacy and the confidentiality of your personal information is very important to us and is fundamental to the way we engage our employees and the public.

Personal information means information or an opinion (including information or an opinion forming part of a database) we hold about you from which we can determine your identity. For example, we may collect and use your name and address details when you apply for employment, or use particular RPC services. Collecting and using this personal information ensures we can deal with employees and members of the public as efficiently as possible.

At RPC we know that giving your personal information to us imposes a responsibility upon us. We are committed to protecting your personal information in accordance with the requirements in Australia of the Privacy Act 1988 (Cth); in Indonesia of the Electronic Information and Transactions Law No. 11 of 2008, the Human Rights Law No. 39 of 1999, and Article 57 of Law No. 36 of 2009; and in Singapore the Personal Data Protection Act 2012.

#### 3. HOW WE COLLECT YOUR PERSONAL INFORMATION

Generally, RPC will collect personal information directly from you, and only to the extent necessary to provide a service or to carry out our internal administrative operations. For example, we may collect personal information from you when you fill in an application form, deal with us over the telephone, ask us to contact you after visiting our web site or have contact with us in person. The type of personal information we collect about you is normally the information included in your application for employment or your resume, for example, your name, mailing address, telephone number, e-mail address, career history, details of any competency tests or other information relating to your career.

Where practical we collect your personal information directly from you. We may collect personal information about you when you deal with us by telephone, letter, fax, e-mail, or visit our website. We will collect personal information from you by lawful and fair means and not in an unreasonably intrusive way. In some circumstances, we may also collect sensitive information about you such as information about your health (including any disability); your driving record; or any criminal record that you may have. Where we collect this type of information we will obtain your consent.

RPC collects information about individuals looking for work, and maintain this information in personnel files; and, if applicants are not successful, RPC may maintain the information in databases for a period of six months. This may include the person's name, address, age, gender, and occupation, and the type of work for which the person is looking.



We collect personal information for any one or more of the following purposes:

- a) Assisting you in finding employment.
- b) Assisting in your career performance or management.
- c) Analysing human resource and labour markets.
- d) Any test or assessments you may undertake.
- e) Helping in work rehabilitation.
- f) To facilitate services to or by us, where your organisation is a client or service provider or potential client or service provider.

There may be occasions when we obtain personal information about you from a third party; for example, from your nominated referees; when receiving the results of a psychological, medical or competency test; or obtaining performance feedback about your work. If we do not have your prior consent, we will take reasonable steps to inform you that we have collected this personal information.

# 4. HOW WE USE AND DISCLOSE YOUR PERSONAL INFORMATION

We may use and disclose your personal information for the purposes it was collected, or for a related or ancillary purpose such as providing you with one of our services, or for internal accounting, administration, regulatory reporting and compliance. We may disclose your personal information to:

- a) Managers for selection and other employment related purposes.
- b) Organisations that conduct medical, competency or psychometric tests.
- c) Referees.
- d) A workers compensation body or insurer.
- e) Suppliers of services to us.
- f) Our insurers.
- g) Our related entities.
- h) Local authorities to establish your driving record.
- Depending on the circumstances to the relevant national or state police force or other law enforcement services and agencies to establish whether you have a criminal record.
- j) Educational or vocational organisations to the extent necessary to verify your qualifications.

Also, we sometimes outsource some of our internal functions and activities to other companies. In the course of doing this, we may disclose your personal information, such as name and address details, to enable the service provider to undertake that particular function.

There are other situations where we are compelled by law to disclose your personal information. For instance, under certain circumstances we may be compelled to provide your personal information to law enforcement agencies, or to government departments.



# 5. OUR DUTY OF CONFIDENTIALITY AND YOUR CONSENT

We have a duty to keep confidential all personal information we hold about you. Generally, our duty of confidentiality applies except where disclosure of your personal information is:

- a) Compelled by law: For example, disclosure to various government departments and agencies such as the Australian Taxation Office and disclosure to courts under subpoena.
- b) In the public interest: For example, where a crime, fraud or misdemeanour is committed or suspected, and disclosure against the customer's rights to confidentiality is justified.
- c) With your consent: Your consent may be implied or express and it may also be verbal or written. You imply consent where we may reasonably conclude that you have given consent by the actions you take or do not take. For example, where you acquire or use an RPC product or service, you consent to RPC storing, using, maintaining and disclosing your personal information to the extent necessary for us to provide that particular product or service to you.

If you do not consent to certain uses of your personal information we may not be able to provide that particular RPC product or service to you.

#### 6. GAINING ACCESS TO INFORMATION WE HOLD ABOUT YOU

Subject to applicable privacy laws, you may gain access to the personal information we hold about you by written request. A request for access to the personal information we hold about you or in relation to an inquiry about privacy should be sent to the Privacy Officer, RPC Technologies Pty Limited, 24 Powers Road, Seven Hills, NSW 2147 Australia.

We will deal with your request to provide information within a reasonable time. We may seek payment for our costs of supplying you with this information. In certain circumstances, the law permits us to refuse your request to provide you with access to your personal information.

Factors affecting your right to access include where:

- a) Access would pose a serious threat to the life or health of any individual.
- b) Access would have an unreasonable impact on the privacy of others.
- c) The request is frivolous or vexatious.
- d) The information relates to a commercially sensitive decision making process.
- e) Access would be unlawful.
- f) Access may prejudice enforcement activities, a security function or commercial negotiations.

#### 7. KEEPING YOUR PERSONAL INFORMATION UP-TO-DATE

If your personal information changes please contact us and we will endeavour to update and correct the information. We may also contact you from time to time to check the information is still correct.



# 8. SECURITY OF YOUR PERSONAL INFORMATION

Your personal information may be stored in hardcopy or electronically. We have security procedures in place to protect your personal information.

#### 9. INFORMATION PROVIDED USING OUR WEBSITES

We have systems in place to ensure our online dealings with you are as secure and confidential as your dealings with us in person, or on the telephone.

A "cookie" is a packet of information that allows the RPC server (the computer that houses our website) to identify and interact more effectively with your computer. When you access our website, we send you a "temporary cookie" that gives you a unique identification number. A different identification number is sent each time you use our website. Cookies do not identify individual users, although they do identify a user's internet browser type and your Internet Service Provider. Our cookie allows us to keep track of the pages you have accessed while visiting our website. It also allows you to page back and forwards through our website and return to pages you have already visited without having to bother about logging on to our home page again.

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. Please refer to your internet browser's instructions or help screens to learn more about these functions. Shortly after you end your interaction with our website, the cookie expires or "crumbles". This means it no longer exists on your computer and therefore cannot be used for further identification or access to your computer.

#### 10. INFORMATION ABOUT ALL OUR VISITORS

When you access any of our websites, we gather information about all of our users collectively, such as what areas users visit most frequently and the services users access the most. Our server logs the following information which is provided by your browser for statistical purposes only:

- a) The type of browser and operating system you are using.
- b) Your Internet Service Provider and top level domain name (for example, .com, .gov, .au, .uk).
- c) The address of any referring web site (for example, the previous website you visited).
- d) Your computer's Internet Protocol (IP) address (a number which is unique to the machine through which you are connected to the internet).

All of this information may be used by RPC for aggregated statistical analyses or systems administration purposes. No attempt will be made to identify users or their browsing activities, except where required by or under law.

#### 11. ABOUT THE INFORMATION YOU PROVIDE VIA OUR WEBSITE

Without your consent we do not disclose information about your individual visits to RPC websites to any outside parties, other than to our related entities or where the law requires it. In order to provide you with the highest standard of services we may store your personal information on a server overseas. By providing personal information via our websites you agree your information may be transferred to servers located overseas.



#### 12. LINKS TO OTHER SITES

The RPC website contains links to other sites. In addition, some of the content appearing on the RPC website may be supplied by third parties, for example, by framing third party websites or the incorporation through "framesets" of content supplied by third party servers. While RPC will always endeavour to engage in business arrangements with commercial entities of good repute and ethical business practices, we are ultimately not responsible for the privacy practices or the content of such websites. We encourage you to read and understand the privacy policies on those websites prior to providing any information to them.

# 13. SEARCHES

Search terms that you enter when using our search engine are collected, but are not associated with any other information that we collect. We use these search terms for the purpose of aggregated statistical analyses so we can ascertain what people are looking for on our web site, and to improve the services that we provide. Also, from time to time, we may use external companies to provide us with detailed aggregate statistical analyses of our web site traffic. At no time is any personal information made available to these companies, nor is the aggregate information ever merged with personal information such as your name, address, email address or other information you would consider sensitive or would compromise your privacy.

#### 14. CHILDREN AND PERSONAL INFORMATION

RPC will endeavour not to collect, use or disclose personal information about anyone under the age of 18 unless we have the consent of a parent or legal guardian.

#### 15. FEEDBACK

Our websites have several areas on the site where you can submit feedback. Any feedback that is submitted through this area becomes the property of RPC. We may use this feedback, such as success stories, for marketing purposes, or to contact you for further feedback on the site. This does not apply to employee records.



# 16. FURTHER INFORMATION ON PRIVACY

In Australia, you can obtain further general information about privacy protection from the Office of the Federal Privacy Commissioner by calling their Privacy Hotline on 1300-363-992, or visiting their website at <a href="www.privacy.gov.au">www.privacy.gov.au</a>, or by writing to The Federal Privacy Commissioner, GPO Box 5218, Sydney NSW 1042.

Indonesia currently does not operate a government office dealing with privacy matters.

In Singapore, you can obtain further general information about privacy protection from the Office of the Personal Data Protection Commission by calling them on +65 6377 3131, or visiting their website at <a href="https://www.pdpc.gov.sg">www.pdpc.gov.sg</a>, or by writing to The Personal Data Protection Commission, 460 Alexandra Road #10-02 PSA Building Singapore 119963.

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RPC INTERNATIONAL SDN. BHD RPC Technologies Pty Ltd RPC Singapore Pte Ltd RPC Technologies (Thailand) Co., Ltd RPC Pipe Systems Pty Ltd PT RPC Indonesia

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