

MAPEL BUILDING PTY LTD

PRIVACY POLICY

1. BACKGROUND

- 1.1 Mapel Building Pty Ltd (ACN 088 066 862), its subsidiaries and affiliates in Australia (**Mapel Building**) are committed to managing personal information in accordance with the Australian Privacy Principles (APPs) under the *Privacy Act 1988* (Cth) (**Privacy Act**) and in accordance with other applicable privacy laws.
- 1.2 This document sets out our policies for managing your personal information and is referred to as our Privacy Policy.
- 1.3 In this Privacy Policy, "we" and "us" refers to Mapel Building and "you" refers to any individual about whom we collect personal information.
- 1.4 This Privacy Policy applies to all personal information collected by Mapel Building via the website: www.mapel.com.au (**website**) or during the course of its ordinary business.

2. ABOUT MAPEL BUILDING

- 2.1 Mapel Building is a Perth-based industrial and commercial construction company.
- 2.2 We offer a complete range of services, including commercial and industrial construction and design, fit-out and maintenance services.

3. WHAT IS “PERSONAL INFORMATION”?

- 3.1 The Privacy Act currently defines “personal information” as information or an opinion about an identified individual, individuals, or an individual who is reasonably identifiable:
 - (a) whether the information or opinion is true or not; and
 - (b) whether the information or opinion is recorded in a material form or not.
- 3.2 If information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “personal information” and will not be subject to this Privacy Policy.
- 3.3 The kind of personal information that we collect from you will depend on how you use the website or our services. The personal information which we collect and hold about you may include:
 - (a) your email address;
 - (b) your Facebook username;
 - (c) your credit card details; and

(d) your location information.

4. INFORMATION WE COLLECT ABOUT CLIENTS AND PROSPECTIVE CLIENTS

4.1 When you enquire about our services or when you become a client of Mapel Building, a record is made which includes your personal information.

4.2 The type of personal information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but will typically include:

(a) your name, e-mail, postal address and other contact details;

(b) information about your employer or an organisation who you represent;

(c) your professional details; and

(d) any additional personal information you provide to us, or authorise us to collect, as part of your interaction with Mapel Building.

4.3 The purposes for which we may use and disclose your personal information will depend on the services we are providing you. For example, if you have engaged us to deliver a service, we may disclose information about you to service providers where this is relevant to our services.

4.4 If you are a customer or participant in an event, we may disclose your personal information to our clients and venues where this is reasonably necessary for, and relevant to, the delivery of the event. We may use images or audio-visual recordings which identify you for promotional purposes where you would reasonably expect this to occur.

5. INFORMATION COLLECTED ABOUT PROSPECTIVE EMPLOYEES AND APPLICANTS

5.1 We collect personal information when recruiting personnel, such as your name, contact details qualifications and work history. Generally, we will collect this information directly from you.

5.2 We may also collect personal information from third parties in ways which you would expect (e.g., from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions.

6. INFORMATION COLLECTED ABOUT OTHER INDIVIDUALS

6.1 Mapel Building may collect personal information about other individuals who are not clients of Mapel Building. This includes customers and members of the public who participate in events we are involved with; individual service providers and contractors to Mapel Building; and other individuals who interact with Mapel Building on a commercial basis.

6.2 The kinds of personal information we collect will depend on the capacity in which you are dealing with Mapel Building. Generally, it would include your name, email, postal address and

other contact details, information about your employer or an organisation who you represent, and information regarding our interactions and transactions with you.

- 6.3 If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you where you would reasonably expect this to occur.
- 6.4 You can always decline to give Mapel Building any personal information we request, but that may mean we cannot provide you with some or all of the services you have requested. If you have any concerns about personal information we have requested, please let us know.

7. HOW WE COLLECT YOUR PERSONAL INFORMATION

- 7.1 We may collect personal information from you whenever you provide such information to us, whether in physical or electronic form, or input such information into our website.
- 7.2 You may visit our website without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to Mapel Building will be managed in accordance with this Privacy Policy. Use of our website is governed by our Website Terms of Use, which can be found at: www.mapel.com.au/terms_of_use.
- 7.3 Our website uses cookies. A “cookie” is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. Cookies may provide data to third party retargeting service providers to enable the provision of relevant targeted advertising of our services on certain third-party websites and across advertising networks.
- 7.4 The use of cookies in this way does not provide your personal information or details to any third-party providers. It only provides information such as your device type, browser type, IP address, pages you have accessed on our website and on third-party websites that indicates you have visited those sites, and accordingly have shown some relevant interest in our company, products and/or services.
- 7.5 You can use the settings in your browser to control how your browser deals with cookies and can generally opt out of retargeting advertising by way of interacting with the specific advert selection options and/or deleting the relevant cookie from your browser software. However, in doing so, you may be unable to access certain pages or content on our website.
- 7.6 Our website may contain links to third-party websites. Mapel Building is not responsible for the content or privacy practices of websites that are linked to our website.

8. HOW AND WHY DOES MAPEL BUILDING COLLECT AND USE YOUR PERSONAL INFORMATION?

- 8.1 Mapel Building collects personal information reasonably necessary to carry out our business, to assess and manage our clients' needs, and to perform services for you. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you and/or third parties and managing client relationships.

- 8.2 The purposes for which Mapel Building usually collects and uses personal information depends on the nature of your interaction with us, but may include:
- (a) responding to requests for information and other general enquiries;
 - (b) managing, planning, advertising and administering services;
 - (c) researching, developing and expanding our facilities and services;
 - (d) informing you of our activities, events, facilities and services;
 - (e) recruitment processes (including for volunteers, internships and work experience); and
 - (f) responding to your enquires and complaints.
- 8.3 Mapel Building generally collects personal information directly from you. We may collect and update your personal information over the phone, by email, over the internet or social media, or in person. We may also collect personal information about you from other sources, such as third-party suppliers and contractors who assist us to operate our business.
- 8.4 Mapel Building will never request bank account or credit card details by email, only via telephone. If you are approached to provide these details by email, please contact us on 08 9456 1955 immediately.

9. COLLECTION OF PERSONAL INFORMATION FOR MARKETING PURPOSES

- 9.1 We may use or disclose your personal information for the purpose of informing you about our services, upcoming promotions and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting via any of the contact details listed on this website, or by utilising any “opt out”, “unsubscribe” or “stop” instruction or function contained in that correspondence.
- 9.2 If you opt-out of receiving marketing material from us, we may still contact you in relation to our ongoing relationship with you.

10. HOW DOES MAPEL BUILDING HOLD INFORMATION?

- 10.1 Mapel Building stores information in paper-based files or other electronic record-keeping methods in secure databases (which may include trusted third-party storage providers or cloud services based in Australia and overseas). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.
- 10.2 We maintain physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, e.g., we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

10.3 Our website does not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our website are encouraged to exercise care in sending personal information via the internet.

10.4 We take steps to destroy or de-identify information that we no longer require.

11. DISCLOSURE TO CONTRACTORS AND OTHER SERVICE PROVIDERS

11.1 Mapel Building may disclose information to third parties we engage in order to provide our services, including suppliers, contractors and service providers used for data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance or development, printing, archiving, mail-outs, and market research.

11.2 Personal information may also be shared between related and affiliated companies of Mapel Building, located in Australia and overseas.

11.3 Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

11.4 Mapel Building will also use and disclose personal information for a range of administrative, management and operational purposes, including:

- (a) administering billing and payments and debt recovery;
- (b) planning, managing, monitoring and evaluating our services;
- (c) quality improvement activities;
- (d) statistical analysis and reporting;
- (e) training staff, contractors and other workers;
- (f) risk management and management of legal liabilities and claims (e.g., liaising with insurers and legal representatives);
- (g) responding to enquiries and complaints regarding our services;
- (h) obtaining advice from consultants and other professional advisers; and
- (i) responding to subpoenas and other legal orders and obligations.

12. OTHER USES AND DISCLOSURES

12.1 We may use and disclose your personal information for other purposes explained at the time of collection or otherwise as set out in this Privacy Policy.

13. ACCESS AND CORRECTION

- 13.1 You are entitled to access your personal information held by Mapel Building on request. To request access to your personal information please contact our Privacy Officer at: info@mapelbuilding.com.au.
- 13.2 You will not be charged for making a request to access your personal information, but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.
- 13.3 We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.
- 13.4 However, if you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.
- 13.5 We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

14. OVERSEAS TRANSFER

- 14.1 Your personal information will not be disclosed to recipients outside Australia unless you expressly request us to do so. If you request us to transfer your personal information to an overseas recipient, the overseas recipient will not be required to comply with the Australian Privacy Principles and we will not be liable for any mishandling of your information in such circumstances.

15. COMPLAINT PROCEDURE

- 15.1 If you have a complaint concerning the manner in which we maintain the privacy of your personal information, please contact our Privacy Officer at: info@mapelbuilding.com.au. All complaints will be considered by a privacy officer and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

16. HOW TO CONTACT US ABOUT PRIVACY

- 16.1 If you have any queries, or if you seek access to your personal information, or if you have a complaint about our privacy practices, you can contact us via any of the contact details listed on our website.

17. CHANGES TO THIS PRIVACY POLICY

17.1 Mapel Building may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes.

18. HOW TO CONTACT US

18.1 The contact details for Mapel Building are generally as outlined on our website from time to time.

18.2 Please address all written correspondence to Mapel Building’s Privacy Officer

This Privacy Policy was last updated on 5/9/2019.

Revisions Table

Rev	By	Date	Change Description