



## PRIVACY POLICY

### Purpose:

The BSA Group of Companies and its Subsidiaries (BSA) are committed to protecting the personal information collected, held and/or disclosed relating to individuals, bound by the *Privacy Act 1988 (Cth)*, as amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)* (the **Act**), and the Australian Privacy Principles (APP).

This Policy, and any supplementary documents, are supported by and support the Code of Conduct and is part of the BSA Group Business Process Framework.

### Approach:

BSA seeks to achieve this purpose by:

- Collecting personal information that is reasonably necessary for one or more of its functions or activities and collecting such information by lawful and fair means in accordance with the APP.
- Taking reasonable steps to ensure *continued* compliance with the APP in disclosing your personal information internally and to third parties including overseas recipients where necessary.
- Providing you an opportunity to request access to your personal information via a written request to the Privacy Officer and providing a written response where under certain circumstances BSA may refuse to grant you access to the personal information.
- Committing to take steps as are reasonable to correct the information, where it is found to hold personal information that is inaccurate, out-of-date, incomplete, irrelevant or misleading.
- Taking steps as are reasonable in the circumstances to protect the personal information from misuse, interference, loss, unauthorised access, modification or disclosure and take such steps as are reasonable in the circumstances to destroy the information or to ensure it is de-identified, if BSA no longer needs the information for any purpose for which the information may be used or disclosed, the information is not contained in any Commonwealth record and BSA is not required by law to retain the information.
- Providing a means by which you can make a complaint about BSA's handling of your personal information through the Privacy Officer in writing if you believe BSA has breached the APP or the commitments of this Policy.
- Making this Policy publicly available on [www.bsa.com.au](http://www.bsa.com.au), and having controlled copy of this Policy on BSA's IMS or by contacting the Privacy Officer by email at [corporate@bsa.com.au](mailto:corporate@bsa.com.au).

### Application:

This Policy applies to all BSA operations and covers all of our activities and services where BSA is required to collect, hold, use and/or disclose personal information relating to individuals (including, but not limited to, its clients, customers, customers of BSA's clients, contractors, suppliers, candidates, employees and shareholders) in the performance of its business activities.

This policy does not apply to the collection, holding, use or disclosure of personal information that is an employee record.

The management teams have the accountability to understand the Policy and bring it to life.

The policy is implemented by the Board and enacted through the Managing Director. It may be reviewed biennially and/or updated as required due to changes in the business, its leadership or the environment within which we operate.

Nicholas Yates  
Managing Director and Chief Executive Officer - BSA Limited - 21st August 2019