

# Privacy Policy

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Leaders in Industrial Commissioning Services

International Commissioning Solutions Group Pty Ltd

Efficiency | Excellence | Flexibility

Our objective is to deliver quality projects safely, on time and on budget. A drive backed by skilled and experienced technical resources from around the world.

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## INTRODUCTION

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This Privacy Notice applies to all Personal Data that ICS Group and other subsidiary or affiliated companies of ICS Group (referred to throughout as “ICSG”) and any websites or equivalent internet resources may generally collect, process and store about you.

By providing your Personal Data to ICS Group, you expressly acknowledge that you have read and understood this Privacy Notice. This Privacy Notice is published on the ICS Group website to ensure it is readily available to all individuals at any point. ICS Group reserves the right to amend the Privacy notice from time to time where reasonable to ensure it continues to accurately reflect the way in which we process Personal Data.

Any updates or changes to the Privacy Notice will be published on the ICS Group intranet and highlighted at the end of this document.

The privacy and security of the Personal Data collected from you is a priority to ICS Group. It is also important to us that you understand how we handle this data.

### **ICS Group Data Privacy Principles**

Data Privacy is built into everything we do. Our data privacy principles apply to everything we do, no matter where we do it. To this end:

1. ICS Group takes responsibility for the Personal Data we hold and process.
2. Personal Data is collected and processed fairly, lawfully, transparently and in accordance with our Code of Conduct and Data Privacy Compliance Policy Framework.
3. Processing of Personal Data is always documented and assessed at the outset to ensure there is the minimum privacy risk and impact to individuals.
4. Personal Data of individuals is always protected, secure and kept confidential.
5. Personal Data is collected only where necessary for legal, regulatory and business purposes and only used for the purposes it was collected for.
6. Personal Data is only retained for as long as is necessary to achieve the original processing purpose or to satisfy our legal and regulatory obligations.

This policy sets out the basis on which any Personal Data we collect from you, or that you provide to us, will be processed by us. For the purposes of any Data Protection legislation, the Data Controller is ICS Group.

## WHAT ARE MY DATA PRIVACY RIGHTS?

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Every individual has the following rights in relation to the processing of their Personal Data by ICS Group:

- The right to access and inspect their Personal Data or be provided with a permanent copy of the information being held about them.
- The right to request the correction of any inaccuracies in their Personal Data or where the accuracy of information is disputed, to add additional information to give notice that they dispute the accuracy of the information content.
- The right to request the erasure of their Personal Data, particularly where the continued processing of the information is no longer necessary.
- The right to object to the processing of their Personal Data, particularly where there are no longer sufficient legitimate grounds for ICS Group to continue processing the information.
- The right to restrict processing, data portability and the right to appeal any automated decision making or profiling.
- The right to complain to a Data Protection Regulator about ICS Group processing of Personal Data.

It is important to note that the rights set out above are not unconditional and the specific circumstances of the processing being undertaken by ICS Group will determine if these rights may be exercised. Further information concerning these rights and their application can be obtained from the Administration Manager.

Information we may collect from you, and use we may make of it We will hold and process any personal information which you provide via the site or by submitting emails and/or online forms, for our own internal business purposes, including lawful purposes relating to recruitment where information is sent by you via the recruitment part of the site.

Examples of Personal Data we may collect from you include, but is not limited to:

- First Name and Surname Contact telephone number(s) Contact email address
- Home or Office Address
- Job Title
- Your Organization details
- Professional Qualifications.

In addition to the information you submit to us via the site, we may collect information about visits to the site. We collect information on the page browser access. This is used within ICS Group to improve the design and layout of our sites. We gather information on the relative popularity of each page, the average number of pages accessed by visitors, the number of emails sent or files downloaded, and the average time spent on the site. None of this information is linked back to you as an individual.

### **Where we store your Personal Data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice. All information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **How is your Personal Data kept secure**

ICS Group have implemented appropriate security measures to protect the confidentiality, integrity and availability of Personal Data. We employ organisational and technical security measures, including password protection, encryption, physical locks, etc., to protect Personal Data and to ensure it is processed appropriately, consistently and in accordance with applicable data privacy laws and regulations. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

If you are authorized to have access to the Personal Data of others, it is important that you take appropriate safeguards to protect this Personal Data.

ICS Group monitors Internet traffic to detect access to inappropriate websites or other materials. ICS Group also uses email filters to block spam and computer viruses. It is possible that some legitimate email messages and websites may be blocked or hindered by these filters.

### **Disclosure of your information**

We do not pass on or sell online personal information to third parties. We may however share information within our organisation and in some cases, it will be necessary to pass information to our pension or share administrators. This may include our employees, agents, contractors and sub-contractors. Please note that by sending your personal information to us you are consenting to the processing and transfer of such information in this way.

### **How long is your Personal Data retained for?**

We retain appropriate records of Personal Data for Regulatory, Legal and Contract administration purposes. We only keep Personal Data for as long as necessary for the purpose or purposes it was collected for. Records are retained for a predefined retention period that may extend beyond a contract with ICS Group. Personal Data is retained to comply with other legal and contractual obligations and requirements such as Health and Safety. Where required, further information concerning our records retention policy can be obtained from the ICS Group Data Protection Officer whose contact details are below.

### **International transfers of Personal Data**

We may transfer Personal Data, for the processing purposes outlined in this Privacy Notice, to any other companies within ICS Group or to Third Parties who process data on our behalf under our instruction. ICS Group and relevant Data Processors may operate globally across Europe, the Middle East, Asia Pacific, North America and Africa and may also set up establishments in other regions. We therefore reserve the right to transfer and process Personal Data on a global and worldwide basis in line with our legal, regulatory and contractual obligations.

We will only transfer Personal Data where necessary to operate our business, meet our contractual obligations and comply with our legal and regulatory obligations. We will endeavour to ensure that such transfers of Personal Data comply with all applicable data privacy laws and regulations and provide appropriate protection for the rights and freedoms conferred on all individuals under such laws. There may, however, be instances where for legal or contractual reasons, we are not permitted to transfer Personal Data outside of certain jurisdictions. Where required, further information concerning overseas transfers of Personal Data can be obtained from the ICS Group Data Protection Officer whose contact details are below.

### **Third Party Web Sites**

We may provide hyperlinks from the site to websites of third parties. Please note that this privacy statement applies only to the contents of this site and not to those websites to which we may provide a link.

### **How to contact us to update your Personal Data**

If any information you have provided to us becomes inaccurate or out of date, or if you have any queries about this privacy statement, please contact us via this website, or via Administration Manager whose contact details are below.

What do I do if I have a complaint or spot a violation of our requirements?

Complaints and/or violations of our requirements about the processing of Personal Data by ICS Group should be raised with the Data Protection Officer in the first instance and should follow the requirements outlined in the Data Privacy Compliance Policy Framework available on the ICS Group intranet.

The Data Protection Officer can be contacted at the following address: [admin@icsgroupau.com.au](mailto:admin@icsgroupau.com.au).

Where an individual is not satisfied with the way we have handled a complaint they may refer the matter to the relevant Data Protection Regulator (for example, Office of the Australian Information Commissioner, the Office) for further consideration.



[www.icsgroupau.com.au](http://www.icsgroupau.com.au)

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