

Naval Group Australia Privacy Policy

Privacy Policy

1. About this policy

- 1.1 Maintaining the security of your personal information is a priority at Naval Group Australia. We are committed to respecting your privacy rights, and pledge to handle your personal information fairly and legally at all times.
- 1.2 Naval Group Australia is dedicated to being transparent about what personal information we collect about you and how we use it.
- 1.3 We are bound by the APPs in the Privacy Act.
- 1.4 This policy explains how Naval Group Australia manages your personal information, and describes why we collect, use and disclose that information.
- 1.5 By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this policy and any other arrangements that apply between us.
- 1.6 We use some defined terms in this policy. You can find the meaning of each defined term in section 2 of this policy.
- 1.7 This policy is set out in the following sections:

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2. Definitions

These words when used in this policy have the following specific meanings:

APPs	means the Australian Privacy Principles in the Privacy Act
Naval Group Australia, we, our, us and similar terms	means Naval Group Australia Pty Limited ABN 14 605 467 123 and our related bodies corporate
personal information	means information or an opinion that identifies you, or from which your identity may be reasonably ascertained (irrespective of whether the information or opinion is true or not, and regardless of the form it is recorded in), and personal information includes sensitive information
Privacy Act	means the <i>Privacy Act 1988</i> (Cth)
related bodies corporate	has the meaning given to it under the <i>Corporations Act 2001</i> (Cth)
sensitive information	is a subset of personal information and includes information or an opinion about your biometrics, criminal record, genetics, health, political opinions, membership of a political association, membership of a professional or trade association, membership of a trade union, philosophical beliefs, racial or ethnic origin, religious beliefs or affiliations and sexual orientation or practices
website	means https://naval-group.com.au and/or any other website we may operate from time to time
you, your and similar terms	means any individual whom we come into contact (for example, a customer, service provider, contractor or job applicant)

3. What types of personal information do we collect?

3.1 Depending upon how you interact with Naval Group Australia, we may collect the following types of personal information from you:

- your name, gender and age or date of birth
- your contact details, such as your residential and postal addresses, telephone numbers and email addresses
- your bank account or financial details
- government related identifiers, such as tax file numbers
- passport and visa details
- your correspondence and communications with Naval Group Australia

3.2 The above list is not exhaustive and, in specific instances, we may need to collect additional personal information about you. Be assured that Naval Group Australia will only solicit and collect personal information if it is reasonably necessary for us to do so to enable us to conduct our functions or activities, or if we are permitted to do so at law.

3.3 Naval Group Australia will not collect sensitive information about you without your consent. Unless one of the limited exemptions under the Privacy Act applies, we will only collect your sensitive information if you consent to such collection and the information is reasonably necessary for one or more of our functions or activities.

4. How do we collect personal information?

Naval Group Australia generally obtains personal information about you by collecting it from the following sources:

Directly from you	For example, through your interactions with us via our website, over the phone, via email or in person, via forms you complete and submit to us (including electronically via our website), or where you contact, register with, post to, like or follow any of our social media accounts, pages, forums or blogs
From third parties and our service providers and contractors	For example, from our IT service providers, marketing agencies, social networking service companies, and other personnel who assist us or who provide services to you on our behalf
From other people involved in your business	For example, from your employer or a business partner or co-director of your company in connection with a tender response submitted to us
From other people relevant to your relationship with us	For example, from: <ul style="list-style-type: none">• a person who has asked us to make a delivery to you• trade contacts or references you have provided to us, if we are considering engaging you, or an entity related to you, for the provision to us of goods and/or services• your current or past employer (with your prior consent), if you are applying for a job or contract with us• your employment or labour hire agency, if you have been referred to us by that employment or labour hire agency

5. For what purposes do we use personal information?

- 5.1 Unless you consent otherwise or where we are permitted to do so at law, your personal information will only be used for the purposes for which it was collected or for another purpose if that other purpose is closely related to the primary purpose of collection.
- 5.2 Examples of the purposes for which Naval Group Australia uses common types of personal information are detailed below:

Generally, we will use the personal information we hold about you:

- to answer your queries and provide you with information you may have requested
- to tell you about our products or services (because, for example, you are an actual or prospective customer or supplier)
- to assess prospective suppliers of goods and/or services (including conducting due diligence and vetting or qualification processes of prospective suppliers)
- to purchase goods and/or services
- for our internal management purposes (for example, to maintain a security register of persons visiting or accessing our premises)
- to enable us to conduct our business generally (for example, by undertaking quality assurance and data processing)
- to effect the collection of fees and charges
- to process and make payments
- to comply with any law
- to identify you and verify your identity
- for direct marketing purposes (as set out in section 9 of this policy)
- for other purposes which are reasonably necessary in connection with our normal functions or activities

If we are considering your application for a job or contract with us, we will use your personal information:

- to assess and determine your eligibility or suitability for a job or contract with us, including reference checks

5.3 The Privacy Act contains certain exemptions in relation to certain acts undertaken in relation to employee records and related bodies corporate. Where appropriate, Naval Group Australia makes use of relevant exemptions in the Privacy Act.

5.4 There are also a limited number of circumstances in which the Privacy Act permits the use or disclosure of your personal information without your consent. An example of this is where the use or disclosure is necessary to prevent a serious and imminent threat to any person's life, health or safety, or a serious threat to public health or safety.

6. Who will we disclose personal information to?

- Generally, we may disclose your personal information:**
- to our staff, management and related bodies corporate (for example, for business decisions, data processing, and marketing and administrative purposes)
 - to our service providers, advisors and contractors, to the extent they require it to assist us in operating our business (for example, our IT service providers may view information on our system from time to time) or who assist us in providing services to you (for example, our insurers)
 - if the disclosure is required by a law or legal process, or requested by a government agency or other third party pursuant to a subpoena, court or other legal process with which we are required to comply
 - to any other person, with your consent (express or implied)
 - as part of a sale or transfer of assets or other corporate transaction

- If you are applying for a job or contract with us, we may also disclose your personal information:**
- to any professional or personal reference(s) you provide in connection with your job or contract application
 - to our insurers for our own professional insurance purposes

7. Cross-border disclosure of personal information

- 7.1 Due to the national and international scope of Naval Group Australia's operations, it is not reasonably practicable to list all of the countries to which we may transmit personal information. The countries in which such recipients are likely to be located include, but are not limited to, France (where Naval Group Australia's parent company is situated).
- 7.2 Naval Group Australia will take reasonable steps to ensure the offshore recipient does not breach the APPs in relation to your personal information.
- 7.3 Naval Group Australia may also store and process personal information at offshore locations, including cloud database or computing facilities provided by third parties. By providing your personal information to Naval Group Australia, you consent to your personal information being disclosed offshore for this purpose.

8. How do we hold and secure personal information?

- 8.1 Naval Group Australia holds your personal information in various ways, including in paper and electronic form.
- 8.2 We take reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification and disclosure including through the implementation of password protected digital storage solutions as well as keeping paper forms in secure filing systems.

9. Direct marketing

From time to time Naval Group Australia may use your personal information to provide you with marketing materials in relation to offers, products and services that we have available. We will not collect, use or disclose your sensitive information for the purpose of direct marketing without your

written consent. You may opt out of receiving marketing communications from us at any time by following opt out instructions provided in such marketing communications.

10. Cookies

A cookie is a data file that a website transfers to your hard drive. This enables the website to track the pages you have visited. A cookie only contains information you supply. It cannot read data on your hard drive. Our website uses cookies. You can set your browser to refuse cookies, however, this may mean you are unable to take full advantage of the features of our website.

11. Accuracy of personal information

Whilst Naval Group Australia takes reasonable steps to ensure the personal information collected from you is accurate, up-to-date and complete, we will assume that any personal information provided by you is free from errors and omissions.

12. Requesting access to personal information

12.1 You may obtain access to personal information which we hold about you by contacting us using the contact details set out below. When you request copies of such information we will endeavour to provide you with the information as soon as reasonably practicable provided however that there may be occasions when access to information we hold about you is denied. Such occasions would include where:

- release of the information would have an unreasonable impact on the privacy of others
- release of the information would be unlawful
- the request for access is frivolous or vexatious
- we are unable to verify your identity
- we are entitled to reject your request pursuant to any law

12.2 We may require you to verify your identity and specify what personal information you require. We will give you reasons if we deny access.

12.3 We ask that requests for access to information be made in writing. Photo identification may be required.

13. Making a complaint about a breach of your privacy rights

13.1 If you believe that Naval Group Australia has breached this policy, the Privacy Act or any related privacy code in dealing with your personal information, you may make a complaint by writing to us using the contact details set out below. We take all complaints seriously and will respond to you within a reasonable period of time, unless we consider your complaint to be frivolous, vexatious or without legal or factual merit.

13.2 If you are not satisfied with the way we have handled your complaint, you can make a complaint to the Office of the Australian Information Commissioner by visiting the following website and following the steps: <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>.

14. Changes to our privacy policy

We reserve the right to change this policy at any time. The updated policy will be available on our website. We encourage you to check our website periodically to ensure that you are aware of our current policy.

15. Contact us

If you have a query regarding privacy, wish to request access to your personal information or make a complaint about possible breaches of privacy, please direct your enquiries to:

Compliance Officer

Naval Group Australia Pty Limited

Level 2, 1 Richmond Road

Keswick SA 5035

Email: complianceofficer@au.naval-group.com.

Phone: +61 8 7099 2100