

Privacy Policy

1. Purpose

This Policy sets out how Byblos Constructions Pty Ltd (“**Byblos Constructions**”, “**we**”, “**us**” or “**our**”) collects, holds, uses and discloses personal information across our business, including our head office and regional operations, our website, and our tendering, project delivery and employment activities. It exists to ensure our handling of personal information is lawful, transparent, and consistent with the **Privacy Act 1988 (Cth)**, while supporting the operational, contractual, and safety needs of our construction business.

2. Scope

This Policy applies to:

- All personal information collected by Byblos Constructions, in any format, across all offices, sites, and work locations we operate
- Clients, prospective clients, and members of the public who interact with our website or offices
- Subcontractors, suppliers, and business partners
- Employees, contractors, and job applicants, to the extent their information is not otherwise governed by the Fair Work Act 2009 employee records exemption

3. Legal and Regulatory Context

This Policy is informed by:

- The Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs) set out in Schedule 1 of that Act
- The Notifiable Data Breaches (NDB) scheme under Part IIIC of the Privacy Act
- Relevant Western Australian legislation, including the Work Health and Safety Act 2020 (WA), where personal information relates to safety and site records

Nothing in this Policy limits any additional obligations we owe under contract, industry licensing requirements, or other applicable law.

4. What Personal Information We Collect

The personal information we collect depends on your relationship with us, and may include:

- Name, date of birth, and contact details (address, phone number, email)
- Project and site details, including property addresses and site access arrangements
- Financial information, including billing details, payment history, and bank account details for invoicing and payroll
- Identification information, such as driver's licence or other government-issued ID, where required for site access, contracts, or verification
- Licensing, qualification, insurance, and Work Health and Safety (WHS) records for subcontractors, tradespeople, and employees
- Employment information, including resumes, references, and work history for job applicants
- Correspondence and records of communications with us (email, phone, site meetings, forms)
- Technical information collected via our website, such as IP address, browser type, device information, and browsing activity (see clause 11, Cookies and Website Data)

We do not intentionally collect sensitive information (such as health information) unless it is reasonably necessary for a specific purpose for example, WHS or workers' compensation matters and, where required by APP 3, only with consent or another permitted ground under the Privacy Act.

5. How We Collect Personal Information

Where reasonable and practicable, we collect personal information directly from you for example, when you request a quote, engage us for a project, submit a tender, apply for a job, visit our website, or otherwise contact one of our offices.

We may also collect personal information from third parties or publicly available sources, including:

- Real estate agents, architects, engineers, or other parties involved in a project
- Subcontractors, suppliers, and referees
- Credit reporting bodies and background or reference check providers, where relevant to a contract or engagement
- Publicly available sources, such as the ABN Lookup or land title registers

Where we collect personal information about you from a third party, we will take reasonable steps to ensure you are made aware of the matters set out in APP 5, including the fact of collection and the content of this Policy.

6. Why We Collect, Hold, Use and Disclose Your Personal Information

We only collect personal information that is reasonably necessary for our functions and activities as a construction business. We use and disclose personal information for purposes including:

- Preparing quotes, tenders, and contracts, and delivering construction and related services
- Managing projects, including site access, scheduling, and coordination with subcontractors and suppliers
- Invoicing, payments, and financial record-keeping
- Complying with our legal, regulatory, WHS, licensing, and insurance obligations
- Recruitment and management of employees and subcontractors
- Responding to enquiries, complaints, and warranty or defect claims
- Direct marketing (see clause 9), where you have not opted out
- Improving our website, services, and business operations

We will not use or disclose personal information for a purpose other than the primary purpose of collection unless the APPs permit us to do so for example, where you would reasonably expect the secondary use, where required by law, or where you consent.

7. Disclosure of Personal Information

We may disclose personal information to:

- Subcontractors, suppliers, engineers, architects, and other professionals engaged on a project
- IT, hosting, accounting, and payroll service providers who assist us to operate our business
- Our insurers, brokers, and legal or financial advisers
- Relevant government and regulatory bodies (for example, state building and WHS authorities), where required or authorised by law
- Our related bodies corporate within the Byblos Group
- A prospective buyer or new owner of our business, subject to appropriate confidentiality protections

We do not sell personal information to third parties for their own marketing purposes.

8. Overseas Disclosure of Personal Information

We do not currently disclose personal information to recipients located outside Australia. If this changes for example, if we engage an overseas-based cloud storage or software provider we will take reasonable steps, in accordance with **APP 8**, to ensure the overseas recipient does not breach the APPs in relation to that information, and we will update this Policy accordingly.

9. Direct Marketing

We may use your personal information to send you updates, promotions, or information about our services. You may opt out of direct marketing at any time by contacting us using the details in clause 15, or by using the opt-out or unsubscribe mechanism provided in the communication. We will not charge you for giving effect to an opt-out request, and we will process it within a reasonable time.

10. Data Quality and Security

We take reasonable steps to ensure the personal information we hold is accurate, up to date, and complete. We also take reasonable technical and organisational steps to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure, including:

- Restricting access to personal information to staff and contractors who need it to perform their role
- Using secure storage for physical and electronic records
- Password-protecting and encrypting sensitive electronic records where appropriate

If we experience a data breach that is likely to result in serious harm to affected individuals, we will comply with our obligations under the **Notifiable Data Breaches (NDB) scheme** in Part IIIC of the Privacy Act, including notifying affected individuals and the Office of the Australian Information Commissioner (OAIC) where required.

When personal information is no longer needed for any purpose for which it may be used or disclosed under the APPs, and we are not required by law to retain it, we will take reasonable steps to destroy the information or ensure it is de-identified.

11. Cookies and Website Data

Our website may use cookies and similar technologies to recognise your browser, remember preferences, and collect information about how visitors use our site, including IP address, pages visited, and time spent on the site. You can adjust your browser settings to refuse cookies; however, this may affect some functionality of our website. We do not use cookies to collect sensitive information.

12. How Long We Keep Your Personal Information

We retain personal information only for as long as necessary for the purposes described in this Policy, or as required by law. This includes, where applicable, statutory retention periods for construction, contract, financial, and WHS records under Australian Commonwealth and Western Australian legislation. Where information is no longer required, we will securely destroy or de-identify it.

13. Access to and Correction of Your Personal Information

Under **APP 12**, you have the right to request access to the personal information we hold about you, and under **APP 13**, you may ask us to correct that information if you believe it is inaccurate, out of date, incomplete, irrelevant, or misleading.

To make a request, contact us using the details in clause 15. We will respond within a reasonable period (generally within 30 days), and we will not charge you for making a request. In limited circumstances permitted under the Privacy Act, we may need to refuse access or correction, in which case we will provide reasons for our decision.

14. Complaints and Non-Retaliation

If you believe we have breached the Privacy Act or the APPs, you may lodge a complaint with us using the details in clause 15. We will acknowledge your complaint, investigate the matter, and respond to you in writing setting out the outcome and any steps we propose to take. No individual will be disadvantaged for raising a privacy concern or complaint in good faith.

If you are not satisfied with our response, you may lodge a complaint with the

Office of the Australian Information Commissioner (OAIC):

- Website: www.oaic.gov.au
- Phone: 1300 363 992

15. Contact Us

For any questions, requests, or complaints regarding this Policy or your personal information, please contact:

- **Byblos Constructions Pty Ltd** (ABN 34 093 886 241)
- Website: byblosgroup.com.au
- Registered / postal address: *190 Abernethy Road, Belmont WA 6104*
- Email: hr@byblosgroup.com.au

Contact details for all sites and offices we operate are set out in the footer of this document.

16. Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices, technology, legal requirements, or business operations. This Policy will be reviewed periodically to ensure alignment with legislative developments and organisational requirements, and the updated version will be reissued with a revised “last updated” date.

Approval & Endorsement

John Kearney
General Manager

Signature:



Date: 30/07/26