



Privacy Policy

Naval Group

Unless otherwise stated, all references in this document to **Naval Group** or the **Company** means Naval Group, and all of their authorised agents or employees.

This document does not form part of your employment contract or other contract of engagement and may be changed by Naval Group at any time, with or without your consent.

Prepared by CFO and General Counsel

Approved by CEO

1. Purpose

This policy describes how Naval Group ABN 14 605 467 123 (**Naval Group**) collects, manages, stores, uses and discloses your personal information. It contains the broad privacy framework within which Naval Group operates, and should be read in conjunction with any:

- supplementary privacy policies; and
- implementation procedures,

that Naval Group introduces or varies from time to time.

2. Scope

This policy applies to all Naval Group and contractors as well as to individuals from whom Naval Group collects, manages, stores, uses or discloses personal information.

Effective date

This Privacy Policy is effective from June 6 2017.

Any amendments must be approved the Naval Group Australia Board.

This policy supersedes all pre-existing policies and procedures. Previous internal policies and procedures have been reviewed and considered in the compilation of this policy.

Questions & interpretations

Questions about this policy should be directed to the General Counsel.

3. How to use this policy

The following key sections describe how to use this policy.

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| Section 4 | Definitions: sets out definitions to assist with using this policy. |
| Section 5 | How does Naval Group collect and hold personal information? |
| Section 6 | What types of personal information does Naval Group collect and hold? |
| Section 7 | Why does Naval Group collect, hold, use and disclose personal information? |
| Section 8 | Direct marketing |
| Section 9 | Cross-border disclosure of personal information |
| Section 10 | How does Naval Group hold and secure your personal information? |
| Section 11 | How can you access and seek correction of your personal information? |
| Section 12 | Complaints |
| Section 13 | More information |

4. Definitions

To explain some of the terminology which commonly appears in this policy:

Information and records may be in electronic or hard copy form. This policy does not extend to information or records that are publicly available, or that would constitute an “employee record” as defined by the *Privacy Act 1988* (Cth) (**Privacy Act**).

Personal information is information or an opinion that identifies you, or from which your identity can be reasonably ascertained (irrespective of whether the information or opinion is true or not, and regardless of whatever form it is recorded in).

Sensitive information is an important type of personal information relating to your:

- biometrics
- criminal record
- genetics
- health
- membership of a political association
- membership of a professional or trade association
- membership of a trade union
- philosophical beliefs
- political opinions
- racial or ethnic origin
- religious beliefs or affiliations
- sexual orientation or practices

5. How does Naval Group collect and hold personal information?

Naval Group collects personal information in a number of ways, including:

- *directly from you*. You may provide your personal information to us via email, telephone, post, in person or by forms that you complete and submit to us
- *from third parties* who you authorise to provide us with personal information
- via our own business development activities

Sometimes it is not practicable or reasonable to obtain personal information from you (for example, when we are collecting information in connection with security clearance procedures). In those circumstances, we may collect the personal information from third parties. If this occurs, Naval Group will take reasonable steps to ensure that you are made aware of the collection, and why it was necessary and reasonable in the circumstances.

5.1 Personal information

Naval Group will only solicit and collect personal information if:

- it is reasonably necessary for Naval Group to conduct its functions and activities
- it is permitted to do so by law

5.2 Sensitive information

Naval Group will only solicit and collect sensitive information if:

- it has your consent, and it is reasonably necessary for Naval Group to collect the sensitive information to enable it to carry out relevant functions or activities
- it is permitted to do so by law

6. What types of personal information does Naval Group collect and hold?

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

- your name, gender and date of birth
- your email address
- your residential and postal address
- telephone numbers

6.1 Personal information from contractors

- your bank account or financial details
- government related identifiers, such as tax file numbers
- passport and visa details

You may refuse to provide personal information to Naval Group. However, if you exercise this right of refusal, it may affect Naval Group's ability to meet its obligations to you or to a third-party agency.

You may also deal with us anonymously or by using a pseudonym. However, if you do so, we may be prevented from providing you with accurate or useful information, and you may not be able to access our full range of products or services.

7. Why does Naval Group collect, hold, use and disclose personal information?

Naval Group may collect, hold and use your personal information for a number of reasons including:

- to provide information in relation to its products or services (for example, because you are an actual or prospective customer or supplier);
- to administer and manage processes which are key to its operations;
- to maintain a security register of persons visiting or accessing its premises;
- to effect the collection of fees and charges;
- to assess any application for employment, during the recruitment process;
- to answer your queries, provide you with information you may have requested and generally conduct dealings with you;
- to comply with legislative or other legal requirements.

Naval Group may disclose your personal information for a number of reasons including:

- to identify you and verify your identity;
- to provide its products or services to you, or the organisation that you represent;
- to communicate with you;
- for other purposes which are related, or directly related (in the case of sensitive information) to the purpose for which your information was initially collected.

Naval Group may disclose your personal information to:

- its related parties;
- other companies or individuals that assist Naval Group to provide its products or services, or to administer its internal operations. This includes:
 - government authorities or other agencies where the disclosure is required or authorised by law;
 - anyone else to whom you authorise Naval group to disclose your personal information;
 - information technology/cloud service providers;
 - external business advisors, such as auditors and lawyers;

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.

8. Direct marketing

Naval Group will not use, or disclose to a third party, your personal information for the purposes of marketing their products or services to you, without your consent.

9. Cross-border disclosure of personal information

Due to the national and international scope of its operations, it is not reasonably practicable to list all of the countries to which Naval Group may transmit personal information overseas. The countries in which such recipients are likely to be located include, but are not limited to, France (where its parent company is situated).

Naval Group will take reasonable steps to ensure the offshore recipient does not breach the *Australian Privacy Principles* (APPs) in relation to your personal information, except where:

- it reasonably believes the offshore recipient is subject to privacy laws in that foreign country consistent with the APPs, and you have access to mechanisms in that country for the enforcement of those privacy laws for the protection of your information
- it is legally permitted or required to make that offshore disclosure
- it informs you that it will not take reasonable steps to ensure that the offshore recipient does not breach the APPs, and you nevertheless consent to the disclosure
- the *Privacy Act* otherwise permits the offshore disclosure

Naval Group 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, you consent to your personal information being disclosed offshore for this purpose.

10. How does Naval Group hold and secure your personal information?

Naval Group will take all reasonable steps to ensure the personal information it collects, uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the collection, use or disclosure. You should ensure that any personal information you provide to Naval Group is both relevant and accurate.

Naval Group has in place user names, passwords and access restrictions that provide electronic protection of personal information stored electronically. Electronic protection of personal information is also undertaken by the use of firewalls and antivirus software.

Naval Group also secures hard copy personal information within buildings or other storage facilities, by placing restrictions on access to and from the buildings.

11. How can you access and seek correction of your personal information

Naval Group will deal with your requests for access or correction of your personal information, in accordance with this policy.

All requests must be made in writing, and in the appropriate form specified by Naval Group from time to time. On receipt of an application, and within a reasonable timeframe, Naval Group will take reasonable steps to inform you of what personal information Naval Group holds.

Naval group will ordinarily grant access to the personal information unless:

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

Naval Group reserves the right to charge a reasonable fee for providing access to the personal information, but not for making the application or correcting personal information held by Naval Group. Naval Group may withhold access to the personal information until the fee is paid.

If you are of the view that your personal information requires correction, you should contact the Privacy Officer listed below.

12. Complaints

If you believe that Naval Group has breached this policy, please contact our Security Officer by mail to Level 2, 1 Richmond Road, Keswick SA, 5000. 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. If you are not satisfied with the way we have handled your complaint, you can make a complaint to the Australian Information Commissioner.

13. More information

If you have any questions or require further information please contact our (Security Officer) by mail at Level 2, 1 Richmond Road, Keswick SA, 5000.