

Privacy Policy

Policy Owner: Group Finance

Version: 3

June 2023

1.0 This Privacy Policy sets out how Lynch Group Holdings Limited (ACN 608 543 219) and its subsidiaries and other related bodies corporate (**the Group**) collects, uses, discloses, or holds personal information.

2.0 Your privacy is important to the Group.

2.1 This Privacy Policy has been developed in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (APPs) (together, **Privacy Laws**)

2.2 A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.oaic.gov.au

3.0 What is Personal Information and why do we collect it?

3.1 '**Personal Information**' is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in material form or not.

3.2 The Group only collects personal information where the information is reasonably necessary for one or more of our functions or activities. We collect personal information by various means (including, but not limited to, when you view our website, fill in a form, send us an e-mail or correspondence, interact with us on social media or speak to one of our representatives – including during candidate interviews). We may also obtain Personal Information when you interact with our website as we may automatically collect technical data about your browsing actions and patterns by using cookies and other similar technologies. Please refer to our Cookies Policy for further details. When collecting personal information by whichever means, the Group will take reasonable steps to provide the appropriate notices and obtain relevant consents in accordance with the Australian Privacy Principles.

3.3 Most information is collected directly from the individual, but the Group may also obtain some personal information from third party sources. We will only collect personal information about you from third parties when it is unreasonable or impracticable to collect it from you directly, or when you have given us permission to do so.

3.4 This information may include (but is not limited to) your name, e-mail, and mailing addresses, contact numbers, and date of birth.

3.5 When we collect Personal Information, we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

- 3.6 We do not generally collect sensitive information about you, but in the event that we do need to collect sensitive information, we will only do so where the collection is required or authorised by law or with your prior consent.
- 3.7 If you provide us with certain services, for example as a contractor or consultant, we may collect your Personal Information and, in some circumstances, sensitive information. Examples of where we collect this information include carrying out safety inductions, where we require you to provide driving records or medical certificates, and if we carry out criminal record checks.
- 3.8 If we do not collect the Personal Information listed above, it may limit our ability to:
- provide you with information about our products and services; and
 - engage you as an employee, personnel, contractor, or business partner.
- 3.9 If you provide Personal Information to us about someone else, you must ensure that you are entitled to disclose that information to us. For example, you should take reasonable steps to ensure the individual concerned is aware of the various matters detailed in this Privacy Policy and has consented to the collection, use and disclosure of their Personal Information as described in this Privacy Policy.

4.0 Using Personal Information

- 4.1 We use your Personal Information primarily for the purpose for which it has been provided, any other purpose you have consented to, and any other purpose permitted under the Privacy Laws. The primary purpose for which we collect, use, and disclose Personal Information is to manage our operations and promote our business. This may include using your Personal Information to provide you with information about our products or services, and the products or services of third parties for any of the following purposes:
- to manage our relationships with customers, suppliers, investors, employees, and other stakeholders;
 - to assess your application for employment, engagement, contracting or consulting services;
 - so that you can provide us with services;
 - to review, develop and improve the products and services we offer, including to conduct market research, data analytics and statistical analysis in relation to our business;
 - to ensure compliance with our legal and regulatory obligations;
 - for corporate transactions such as business mergers and acquisitions, e.g., to assess or facilitate those transactions and manage the transition of the

business;

- in relation to investors, assessing applications, managing your investment, and providing investor services.

4.2 We will not sell any Personal Information that you give us to any third party.

5.0 Disclosure of Personal Information

5.1 We may disclose your Personal Information to third parties for the purposes for which we may use your information as described in section 4.1 above. This may include disclosing information:

- within the Group, to our subsidiaries and related entities;
- to third party organisations such as our affiliates, business partners, advertising partners, mailing, and printing houses, IT providers, analytics providers, professional advisors, and other service providers;
- for investors, to third party organisations such as the share registry, information relating to your application or shareholding, e.g., information about the number of shares you hold or seek, any power of attorney, proxy or corporate representative appointed by you, your shareholder reference number or holder identification number and your tax file number if you choose to provide it;
- anyone who is considering acquiring an interest in our assets or businesses (or any part of them) as part of a due diligence or sale process; and / or
- any other individual or third party for any authorised purpose with your consent or when authorised or required by law.

5.2 We will only disclose your Personal Information for other purposes if you consent, if we are required or authorised by law to do so, where the disclosure is authorised under the Privacy Laws, or where we believe you would reasonably expect us to disclose your Personal Information for a purpose which is related to (or in the case of sensitive information, directly related to) the primary purpose of collection.

5.3 If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer (to the extent permissible at law) our databases, together with any personal information and non-personal information contained in those databases.

5.4 We do not generally disclose Personal Information to entities located overseas. In the unlikely event we do need to disclose information overseas, we will take reasonable steps to ensure that the overseas recipient does not breach the Privacy Laws in its handling of the Personal Information.

- 5.5 Contracts with all service providers/consultants whose service involves access to personal information must be subject to contract terms that are compliant with the Group Privacy Policy and Office of the Australian Information Commissioner guidelines and rules that are legally binding. Where necessary, formal Non-Disclosure Agreements are in place. Third parties which receive personal information to provide a service for the Group are required to sign an undertaking that the information will only be used for the purpose for which the information was provided.

6.0 Accuracy and Security of Personal Information

- 6.1 We take reasonable steps to keep your personal information accurate and up to date.
- 6.2 Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification, or disclosure, whether held electronically or physically.
- 6.3 When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information.

7.0 Access to or Correction of Personal Information

- 7.1 You may request access to the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing as per clause 11 below.
- 7.2 The Group will not charge any fee for your access request but may charge you a reasonable fee if your request for access is clearly unfounded or excessive.
- 7.3 We will respond to your requests for access or correction within a reasonable period after the request is made. There may be situations where we are not required to provide you with access to your Personal Information, such as where the request relates to an existing or anticipated legal proceeding, or if your request is unfounded or excessive.
- 7.4 We may need to verify the accuracy of new information you provide us before making corrections to your Personal Information held by us, and to protect your Personal Information we may require identification from you before releasing the requested information.

8.0 Cookies

- 8.1 Our website uses cookies to provide the functionality necessary to deliver our products and services. Our website also uses a number of third-party services that also utilise cookies. We do not control these third parties, or their cookies and we refer you to the third party's website for details on how they use their cookies.
- 8.2 Cookies in use may identify individuals who log into our website. You can reject cookies by changing the settings on your browser but doing so may limit your functionality and

user experience within our site. For further information, please refer to our Cookies Policy.

- 8.3 Cookies are small text files that are placed on, and stored through, your web browser of choice. The services the Group provides and use internally utilise cookies to provide these services. This may include personalising content and advertising, for security and session management, and to enhance your experience when using our website.
- 8.4 Third party cookies may also be used on our website. The Group does not control the third parties, or their cookies and we refer you to the third party's website for details as to how they use their cookies.
- 8.5 Each cookie used on our website has a specific purpose and are generally categorised as either: (i) essential cookies; and (ii) non-essential cookies.
- 8.6 Essential cookies are those which are necessary for the website to operate or function effectively. Essential cookies do not generally collect personal information. All other cookies are non-essential, and may, in some cases, collect your personal information. To the extent the cookies we use collect your personal information, details about how we use your personal information are in our Privacy Policy list above: <https://lynchgroup.com.au/privacy-policy>.
- 8.7 The types of cookies placed on your browser when you visit our website (some of which are set by the Group and by third parties) include non-essential cookies from Google, Doubleclick.net, Cloudflare, Zopim, Inspectlet or Hotjar. Their purpose is generally to enable personalisation of your experience, recording preferences based on user ID, analysis of usage in aggregate form, monitor user input, gather statistics, third party / targeted advertising.
- 8.8 You may choose to accept or reject certain cookies by managing your browser settings. However, if you reject cookies (especially essential cookies), you may be limiting the functionality and your user experience within our website.
- 8.9 You can also opt out of the collection and use of their information for ad targeting. Mechanisms for exercising that choice are available here <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu/>.

9.0 Analytics

- 9.1 Our website uses analytics platforms that allow us to better understand how users experience our website and applications. Generally, the type of information that is collected includes (but may not be limited to):
- type of device being used to access the website;
 - country where user is located;
 - time on a page;

- bounce rate - the number of users that enter and leave the same page (expressed as a percentage);
- channel; and
- other metrics as required.

9.2 The Group uses Google Analytics to collect and process anonymous and aggregated data. Details and information about these services and how Google uses the collected data is available at www.google.com/policies/privacy/partners.

10.0 Policy Updates

10.1 From time to time, it may be necessary for us to review and revise this Policy. We reserve the right to amend this Policy at any time and to notify you by posting an updated version of the Policy on our Intranet.

11.0 Privacy Policy Complaints and Enquiries

11.1 If you have any queries or complaints about our Privacy Policy, please contact the Head of Human Resources:

- by phone: (02) 8778 5388
- by email: hr@lynchgroup.com.au
- by post: 8B Williamson Road, Ingleburn NSW 2565