

### Who we are

The Trivantage group of companies (Trivantage Group) is a wholly owned entity of Southern Cross Electrical Engineering LTD (SCEE). Trivantage Group provides electrical services, switchboard manufacturing, data communications, nurse call and security technology and other associated services. Our head office is located in Thomastown, Victoria.

Companies in the Trivantage Group are:

- (a) Trivantage Holdings Pty Ltd ACN 630 204 072
- (b) Trivantage Group Pty Ltd ACN 132 756 551
- (c) Trivantage Pty Ltd ACN 166 668 337
- (d) Ladd Electric Pty Ltd ACN 111 286 036
- (e) Central Control Sheetmetal Pty Ltd ACN 084 254 151
- (f) Group CCTV Pty Ltd ACN 139 856 456
- (g) Positive Systems Pty Ltd ACN 108 616 600
- (h) SJ Electric Group (NSW) Pty Ltd ACN 124 414 759
- (i) SJ Electric Group (QLD) Pty Ltd ACN 124 414 768
- (j) SJ Electric (SA) Pty Ltd ACN 008 290 480
- (k) SJ Electric (VIC) Pty Ltd ACN 074 448 481
- (l) SJ Electric (WA) Pty Ltd ACN 078 494 738
- (m) Seme Solutions Pty Ltd ACN 131 507 152

Companies in the Trivantage Group comply with the Privacy Act 1988 (Cth) (the Privacy Act), including the Australian Privacy Principles. This policy describes the way that companies in the Trivantage Group collect, hold, disclose and protect personal information.

### Part 1 – General Privacy Policy

#### Collection

The nature of our dealings with you influences the types of personal information that we collect and hold. We may collect personal information about you when you:

1. request us to provide you with quotes for supply, manufacturing or services,
2. request credit,
3. provide visitor information when attending a site owned or occupied by us,
4. supply products or services to us, including as a subcontractor,
5. provide information to us in relation to an incident which may occur in the course of the provision of goods or services by, or to, us, or
6. apply for or register your interest in employment with us.

We generally collect personal information directly from you, but we may also collect it from third parties, including public sources or entities associated with you. If we collect personal information about you from a third party, we will take reasonable steps to notify you.

Any unsolicited information (information we took no active step in collecting) received about you will be handled in accordance with the law. This may include destroying or de-identifying that information we could not have lawfully collected even if it were in fact solicited.

The personal information we collect about you will usually include your name and contact details (address, telephone and e-mail address), organisational affiliations and positions held. In some situations, such as when you apply for credit from us or agree to personally guarantee a credit agreement, we may also need to collect and hold additional general information about you, such as your driver's licence number, date of birth, financial records, income details, asset listings, bank account details and details of recent residences. We may also collect bank account details for the purpose of making payments to you, if you are a supplier, contractor or subcontractor to us.

If you apply for employment with us, we may also collect additional information about you, including your background, character, experience and qualifications. This may include information about your health, employment history, financial circumstances, eligibility to work, education history, and any criminal record and vocational qualifications. We may obtain and exchange such information from and with recruitment agencies, academic institutions, personal referees, current and former employers, health service providers, law enforcement agencies, regulatory authorities, public registers and professional and trade associations.

Where we collect personal information about you in relation to providing credit we may disclose that information to a credit reporting business. Where we do this, we are bound by the Credit Reporting Code 2014, available at the website of the Office of the Australian Information Commissioner. Further information our duties when providing credit can be found at Part 2 of this policy, Credit Related Personal Information Policy.

We will only collect sensitive information about you (as that term is defined in the Privacy Act) about you with your consent or when permissible under Australian law and will only use this information for a legitimate purpose where it is reasonably necessary.

If you do not provide us with your personal information, it may not be possible for us to provide you with the services you request, employ you, contact you, or consider your application for credit.

### Use and Disclosure

We collect, hold and use your personal information for the purposes and related purposes for which it was collected, including to:

1. provide goods and services to you or your associated entities;
2. provide you with quotations, updates and information about our products and services, including safety information;
3. if you are a supplier, contractor or subcontractor to us, comply with our obligations under any tender process or contract in which you are participating with us or to make a payment to you or your associated entities; and
4. otherwise manage our relationships with you and, where the information was given to us for another specific purpose (such as a job application), for that purpose.

We may use your personal information for a secondary purpose with your consent or where permitted or required to do so by law. We may also use your personal information to send you promotional material in relation to our services from time to time. If we do so, we will provide you with the option to opt-out of receiving this material.

On occasions, we may disclose your personal information to another person, such as our customers (and potential customers) and their advisers (for example if you are a supplier, contractor or consultant to us), our insurers or external service providers. Where we do so, disclosure will be as permitted under the Australian Privacy Principles and/or with your consent if required.

If the nature of services you request requires it, we may disclose your personal information to a person located in another country. Before we disclose personal information to an overseas recipient we will take reasonable steps to obtain your consent and to ensure that the overseas recipient does not breach the Australian Privacy Principles in respect of that personal information.

We do not sell or trade personal information about you to or with third parties.

### Website and Cookies

When you visit our website, we collect general anonymous information (such as your browser type, information downloaded, pages visited and the domain name and country from which you request information) periodically for statistical and website development purposes.

Our website may use 'cookies' to identify the areas of our website that you have visited. Cookies are small text files stored on your computer or mobile device by your web browser. Cookies are used to personalise the content that you can see on our website.

### Data Security

We value the security and confidentiality of the personal information we collect and hold about you. We take all reasonable steps to protect all information we hold about you from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

We protect the personal information we hold about you with physical, electronic and managerial procedures including:

1. confidentiality agreements or undertakings for our employees and contractors;
2. security measures for our systems access, and
3. periodic evaluation of information protection practices.

We will retain your personal information while it is required for our business functions, or for any other lawful purpose.

When we no longer need to retain your personal information for the purposes outlined above or as required by law, we will destroy or de-identify the information.

### Data Breaches

Pursuant to the Privacy Act 1988 (Cth), we are required to notify the Office of Australian Information Commissioner of any notifiable data breaches. If we have reasonable grounds to believe there has been a notifiable data breach, we are required to undertake a reasonable and expeditious assessment within 30 days to ascertain whether a relevant breach has in fact occurred.

If it is determined that there has been a notifiable data breach, and we are unable to take remedial action to prevent the breach from causing serious harm to affected individuals, we are required to draft a statement to the Office of Australian Information Commissioner. This statement must provide a description of the breach, the kinds of personal information concerned, and recommendations about the steps affected individuals should take in response to the breach. We are also required to directly notify affected individuals of the content of the statement, or publish the statement publicly.

**Part 2 – Credit Related Personal Information Policy (Commercial Credit)****Agreements of Credit Reporting Bodies**

Any agreement we enter with a Credit Reporting Body will bind us and the credit reporter to comply with Part IIIA of the Privacy Act 1988 (Cth), the Privacy Regulation 2013 and the Privacy (Credit Reporting) Code 2014 (The Code). Employees who handle credit reporting or eligibility information will be trained to comply with those requirements and will be informed of the importance of compliance.

**Use of credit related personal information**

We use credit related personal information for a range of purposes including to determine a credit applicant's or guarantor's creditworthiness, whether or not to grant or increase the amount of credit granted under a credit facility, whether to require the provision of security and the nature of the security to be provided, managing a credit facility, including by way of debt recovery and enforcement action, and maintaining credit and accounting records.

We may provide credit related personal information to solicitors or debt recovery agents for the purpose of assisting us to recover unpaid debts.

**Disclosures to Credit Reporting Bodies**

Before we ask you for information related to providing credit, if we are likely to disclose the information to a Credit Reporting Body we will:

- a) notify you of the name and contact details of the body,
- b) inform you that we may be required to disclose failures by you to meet your credit obligations to the Credit Reporting Body,
- c) notify you of your rights to access information, complain, or to request correction of information,
- d) notify you of other things The Code requires us to notify you.

In the interests of saving time we may notify you of the above matters by explicitly referring you to the location of notifiable matters on our website.

We will never disclose to a Credit Reporting Body or another Credit Provider any information not relevant credit reporting information. It may be, however, that certain information that does not seem to be relevant is in fact relevant for determining repayment capacity.

In the event we have disclosed to a Credit Reporting Body a default by you, and after we have done so, you have fully (including any interest and fees) satisfied the overdue payment amount, we will disclose the Credit Reporting Body the fact you have paid the overdue amount. If you specifically request we make this statement to the Credit Reporting Body, we will do our best to make the disclosure within 3 business days of your request.

**Access to Information**

We will provide access to your personal credit reporting or eligibility information on request from you. We will provide access within a reasonable period of time, which may vary depending on how difficult it is to compile your information and ensure that no other person's privacy is affected. We may also charge a small fee to complete this task which may, again, vary depending on the difficulty of the task.

**Part 3 – Contact, Complaints and Version****Access and Correction**

We take reasonable steps to ensure that all personal information is up-to-date, accurate and complete. You may request access to, and request us to update or correct, the personal information we hold about you.

If you would like to do so, please contact our Privacy Officer, using the contact details below:

The Privacy Officer  
Trivantage Group  
76 Commercial Drive  
Thomastown VIC 3074  
Telephone: +61 3 9466 3977  
Email: [info@trivantage.com.au](mailto:info@trivantage.com.au)

We may refuse to provide access to personal information if the law allows us to do so.

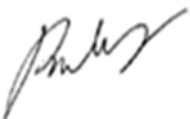
**Complaints**

If you wish to make a complaint about how we handle your personal information, please contact our Privacy Officer using the contact details above. When lodging a complaint, please include your name, contact details, details of your complaint and how you wish for the issue to be rectified. We will make every endeavour to respond to your request promptly.

If you are not satisfied with our response or we do not respond within 30 days, you may make a complaint in writing to the Office of the Australian Information Commissioner.

**Updates**

This Privacy Policy will be reviewed every two years or where required to reflect change in relevant legislation.



Ben Weston  
CEO

3<sup>rd</sup> January 2025