

Privacy Policy

Policy

ABOUT THIS POLICY

Scope. At Kayelle Development Consultants Pty Ltd (ACN 005 376 125) trading as KLM Spatial (**KLM Spatial, we, us or our**) we recognise the importance of your privacy and understand your concerns about the security of the personal information, personal credit history and credit worthiness information you provide to us. This Privacy Policy, which is subject to the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**), and the Credit Reporting Regime and the Credit Reporting Privacy Code (**CR Code**) (collectively, **Privacy Legislation**), regulates how we collect, use, disclose, store and destroy the personal information and credit information we hold about you.

Amendment. We may change, vary or modify all or part of this Privacy Policy at any time in our sole discretion. It is your responsibility to check this Privacy Policy periodically for changes. If we adopt a new Privacy Policy:

we will post the new Privacy Policy on our website; and

it will then apply through your acceptance of it by subsequent or continued use of the website and/or our services.

Definitions. The Privacy Legislation defines the following terms:

Credit eligibility information about an individual means:

- (a) Credit reporting information about the individual that was disclosed to a credit provider by a credit reporting body under Division 2 of Part IIIA of the Privacy Act; or
- (b) Credit provider derived information about the individual - meaning any personal information (other than sensitive information) about the individual:
 - i. that was derived from (a) above; and
 - ii. that has any bearing on the individual's credit worthiness; and
 - iii. that is used, has been used or could be used in establishing the individual's eligibility for consumer credit.

Credit information about an individual is personal information (other than sensitive information) that is:

- (a) Identification information about the individual; or
- (b) consumer credit liability information about the individual; or
- (c) repayment history about the individual
- (d) financial hardship information about the individual; or
- (e) a statement that an information request has been made in relation to the individual by a credit provider, mortgage insurer or trade insurer; or
- (f) the type of consumer credit or commercial credit, and the amount of credit, sought in an application:
 - i. that has been made by the individual to a credit provider; and
 - ii. in connection with which the provider has made an information request in relation to the individual; or
- (g) default information about the individual; or

- (h) payment information about the individual; or
- (i) new arrangement information about the individual; or
- (j) court proceedings information about the individual; or
- (k) personal insolvency information about the individual; or
- (l) publicly available information about the individual
 - i. that relates to the individual’s activities in Australia or the external Territories and the individual’s credit worthiness; and
 - ii. that is not court proceedings information about the individual or information about the individual that is entered or recorded on the National Personal Insolvency Index; or
- m) the opinion of a credit provider that the individual has committed, in circumstances specified by the provider, a serious credit infringement in relation to consumer credit provided by the provider to the individual.

Personal information generally includes information or an opinion about an identified individual, or about an individual who is reasonably identifiable:

- (a) Whether the information or opinion is true or not; and
- (b) Whether the information or opinion is recorded in a material form or not.

Sensitive information, a sub-set of personal information, is information or an opinion about an individual’s racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information, genetic information and biometric templates.

PURPOSE

Primary and Secondary Purposes.

We collect personal information from you and, subject to clause 0, you consent to us using your personal information (other than sensitive information) for the following primary and secondary purposes:

Purpose/Activity	Type of personal information	Basis for use
To process and deliver services to you including but not limited to: <ul style="list-style-type: none"> ➢ preparing and delivering documents (including purchase order forms and other contractual documents) ➢ managing payments, fees and charges ➢ collecting and recovering money owed to us 	<ul style="list-style-type: none"> ➢ Identity ➢ Contact ➢ Financial ➢ Transaction ➢ Client 	<ul style="list-style-type: none"> ➢ Performance of a contract with you ➢ Legal and regulatory requirement ➢ Necessary for our legitimate interests (e.g., to recover debts due to us)
To provide you with information about the services you requested and any other services you may be interested in	<ul style="list-style-type: none"> ➢ Identity ➢ Contact ➢ Client ➢ Marketing Communications 	<ul style="list-style-type: none"> ➢ Performance of a contract with you ➢ Improvement of delivery of Services to you

To personalise and customise your experiences with us	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Client ➤ Technical ➤ Marketing Communications ➤ Profile 	and	<ul style="list-style-type: none"> ➤ Performance of a contract with you
To help us meet our warranty obligations	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Client ➤ Technical 		<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ Legal and regulatory requirement
To help us assess an application submitted by you or on your behalf in relation to your employment with KLM Spatial	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Client ➤ Technical ➤ Profile ➤ Financial 		<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ Legal and regulatory requirement ➤ Necessary for our legitimate interests (e.g., to determine your suitability for employment with us) ➤ Arranging for payment to you in accordance with your employment contract
To help us review, manage and enhance our Services and develop insights used in reports or other content developed by us	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Client ➤ Technical ➤ Marketing Communications ➤ Profile 	and	<ul style="list-style-type: none"> ➤ Necessary for our legitimate interests (e.g., to study how our customers interact with and use our services, to develop our services, to grow our business, and to inform our marketing strategy)
To communicate with you, including by email, mobile and in-application notifications	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Profile 		<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ Necessary for our legitimate interests (e.g., to resolve any matters that require additional services or attention by us in relation to the services delivered to you)
To process payments and administer your account, including to send you account related reminders	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Financial ➤ Transaction ➤ Client 		<ul style="list-style-type: none"> ➤ Legal and regulatory requirement ➤ Necessary for our legitimate interests (e.g., to recover debts due to us)
To investigate any complaints about or made by you	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Financial ➤ Transaction ➤ Client 		<ul style="list-style-type: none"> ➤ Legal and regulatory requirement ➤ Necessary for our legitimate interests (e.g., to ensure that we continue to deliver services in accordance with industry best-practice)
To do anything else as required or permitted by any law	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Financial ➤ Transaction ➤ Client ➤ Technical 		<ul style="list-style-type: none"> ➤ Legal and regulatory requirement ➤ Necessary for our legitimate interests ➤ Improvement of delivery of Services to you

-
- Marketing and Communications
 - Profile
-

WHAT WE COLLECT

The kinds of personal information, credit information and credit eligibility information we collect from you or about you, depends on the transaction you have entered into with us, the services you or your organisation have contracted us to provide, and the services you or your organisation are interested in.

Personal Information. Personal information we collect about you may include identification information such as your name, address, email address, phone number(s), financial and payment information and such other information necessary or convenient for delivering our services. If you are a contractor (or a prospective employee or contractor), we collect your name, address, gender, date of birth, telephone numbers, voice and image, email address, education, qualifications, employment experience, CV or resume, background checks, referee checks, banking, tax and superannuation accounts and identification numbers, next of kin or emergency contact details, and medical certificates or health information.

Credit information. We will generally collect credit information from you if you apply for a commercial credit account with us, or you are or propose to become a guarantor for someone else's commercial credit account with us. The kinds of credit information we commonly collect and hold from you or about you include your name, alias or previous names, date of birth, gender, drivers licence details, current and 2 previous residential addresses, and name of your current employer. We will also collect information relating to your personal current credit liabilities, previous credit payments and defaults, current and previous Court proceedings and insolvency actions against you and information about your credit worthiness. This credit information may relate to both consumer and/or commercial credit.

Other information. We may collect, and you consent to us collecting, information relating to you that is not personal information, such as data relating to your activity on our website and social media, including:

the internet protocol address or MAC address and a component of the domain name used (e.g., .com or .net);

the type of browser and operating system you used;

the date and time you visited our website;

the web pages or services you accessed at our website;

the time spent on individual pages and our website overall;

which files you downloaded;

information about your computer and Internet connections using cookies;

when using social media, any information that you allow the social media site to share; and

information regarding your dealings with us, including feedback and insights; and

information regarding your past or current employment if you apply for employment with us, interact with us on behalf of your employer, or apply to volunteer with us.

Sensitive information. We will only collect, hold, use or disclose any sensitive information about you with your consent or if you volunteer such sensitive information to us. In particular we will collect sensitive information if it is relevant to our services, including for example, religious affiliations for the proposal of a cultural permit.

Generally, we do not collect sensitive or health information. However, we may collect sensitive information from you or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. For example, we may collect some sensitive information from or about our current and prospective employees and contractors, in order to make operational decisions about our business and for site and project planning etc. In all other situations, we will specifically seek your consent.

HOW AND WHY, WE COLLECT AND HOLD

Why we collect. We collect, hold, use and disclose personal information, credit information and credit eligibility information from you or about you where it is reasonably necessary for us to carry out our business functions, activities and services. For example, we collect, hold, use and disclose your personal information, credit information and credit eligibility information as necessary to provide our services, and to schedule and complete our contracts and projects and for the purposes of assessing your application for a commercial credit account with us, and for collecting overdue payments.

Guarantor. If you are a guarantor or proposed guarantor for someone else's credit account, we collect, hold, use and disclose credit information and credit eligibility information about you for the purpose of assessing your suitability as a guarantor, and (if necessary) for enforcing the guarantee and collecting payments owed to us.

How we collect. We aim to collect personal information, credit information and credit eligibility information directly from you, unless it is unreasonable or impracticable for us to do so.

For example, we collect this kind of information from you or about you:

- when you complete an application, consent, purchase, account sign-up or similar form via our website or otherwise;
- when you contact us to submit a query or request;
- through telephone calls, consultations and meetings with us;
- when you post information or otherwise interact with our website;
- from your activity on our website and social media platforms
- when you participate in one of our surveys;
- from those who request our services on your behalf;
- from publicly available sources of information;
- from government regulators, law enforcement agencies and other government entities;
- from business contacts, external service providers and suppliers; or
- by other means reasonably necessary.

Third party collection. If we collect any personal information about you from someone other than you, to the extent not already set out in this Privacy Policy, we will inform you of the fact that we will collect, or have collected, such information and the circumstances of that collection before, at or as soon as reasonably practicable after we collect such personal information.

Authority. If you provide us with the personal information of another individual, without limiting any other provision of this Privacy Policy, you acknowledge and agree that the other individual:

- has authorised you to provide their personal information to us; and
- consents to us using their personal information in order for us to provide our services.

Unsolicited information. If we receive unsolicited personal information about you that we could not have collected in accordance with this Privacy Policy and the Privacy Legislation, we will, within a reasonable period, destroy or permanently de-identify such information received.

Anonymity. If you would like to access any of our services on an anonymous or pseudonymous basis we will take reasonable steps to comply with your request, however:

- you may be precluded from taking advantage of some or all of our services; and
- we will require you to identify yourself if:
 - we are required by law to deal with individuals who have identified themselves; or
 - it is impracticable for us to deal with you if you do not identify yourself.

Collecting credit information. We will also collect credit information about you from specific requests that we make to credit reporting bodies. In some instances, we may receive credit information about you from other credit providers with whom you deal. Credit eligibility information will be disclosed to us by credit reporting bodies in response to our request. Our obligation under the Privacy Legislation does not require us to obtain individual consent to the disclosure of information to a credit reporting body.

Holding credit eligibility information. We hold reports and information disclosed to us by a credit reporting body (such as Equifax). We also compile our own, internal credit file about you on the basis of such information. This information relates to an assessment of your personal credit worthiness.

Destruction. We will retain your personal information, credit information and credit eligibility information whilst it is required for any of our business functions, or for any other lawful purpose. We will take reasonable steps, and we will use secure methods to destroy or permanently de-identify your personal information, credit information and/or credit eligibility information if the purpose for which we collected the personal information, credit information or credit eligibility information from you no longer exists or applies. As an example, our destruction and de-identification methods may include:

- (a) Paper records being placed in security bins and shredded; or
- (b) Electronic records being delivered from all locations to the best of our ability or encrypted and/or placed beyond use.

Website and Google Analytics. We have integrated Google Analytics into our website (see <http://www.google.com/analytics/> for details). We use Google Analytics Demographics and Interest Reports to obtain a more detailed understanding of our website users and their potential needs. Data collected from such reports may be used to more accurately target marketing and advertising campaigns based on demographic information and more generally for the purposes detailed in this Privacy Policy. We do not collect personal information about individuals by such methods; only aggregate data is collected and used for planning purposes.

Cookies. We may use 'cookie' technology to assist us to determine in the aggregate the total number of visitors to the website on an ongoing basis and the types of internet browsers and operating systems used by users of the website. This information is used to enhance the usability and functionality of our website and for marketing, advertising and analytic purposes. When you browse our website, contact us electronically, or engage with us on social media, we may also record geographical tagging, cookies, your IP address and statistical data from your activity. We may use your personal information to customise and improve your user experience on our website and other social media platforms. By using our website, you agree that we can record this information from your device and access them when you visit the site in the future. If you want to delete any cookies that are already on your computer, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies. Please note that by deleting our cookies or disabling future cookies that you may not be able to access certain areas or features of our site. Our website may also contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

If not collected. If we do not collect, hold, use or disclose your personal information, credit information or credit eligibility information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction or project you have entered into, or provide the services that you or your organisation have contracted us to provide.

USE

Primary use. We will only use and disclose your personal information:

- for purposes which are related to our functions, activities and services; or
- if we otherwise get your consent to do so,
- in accordance with this Privacy Policy and the Privacy Legislation.

Reasonable uses. We also collect, hold, use and disclose your personal information, credit information and credit eligibility information for related purposes that you would reasonably expect, such as our administrative and accounting functions, business operations, site and project scheduling, record keeping,

payment processing, fraud checks, providing you with information about other services offered by us, marketing and promotions, market research, customer feedback and quality assurance surveys, statistical collation, social media analysis and website traffic analysis. We will disclose credit information about you to credit reporting bodies for purposes related to assessing your credit worthiness, and reporting on payment defaults. Where we wish to use or disclose your personal information, credit information or credit eligibility information for other purposes, we will obtain your consent. We may disclose credit eligibility information to other credit providers and to guarantors, where we have obtained your consent.

Third parties. We may also disclose personal information, credit information and credit eligibility information to third parties (including debt collectors, government departments and enforcement bodies) where required or permitted by law, or where it is reasonably necessary to provide our services, and to schedule and complete our contract and projects.

Direct marketing. We will offer you a choice as to whether you want to receive direct marketing communications about services. If you choose not to receive these communications, we will not use your personal information for this purpose.

We will otherwise only use or disclose your personal information for the purposes of direct marketing if:

- we collected the information from you;
- it is reasonable in the circumstances to expect that we would use or disclose the information for direct marketing purposes;
- we provide you with a simple means to 'opt-out' of direct marketing communications from us; and
- you have not elected to 'opt-out' from receiving such direct marketing communications from us.

Opt-out. Where we use your personal information for marketing and promotional communications, you can opt out at any time by notifying us. Opt out procedures are also included in our marketing communications.

Automated Decision Making. We do not make decisions solely through the use of automated decision platforms or in any manner which may affect your rights or interest, or which are used to assist substantially and directly in making that decision. If we made a decision solely through an automated decision platform, or which may affect your rights or interest, or which are used to assist substantially and directly in making that decision, we will notify you directly.

DISCLOSURE

How we disclose. We may disclose personal information and you consent to us disclosing such personal information to:

- third party service providers who perform functions or provide services on our behalf;
- relevant regulatory bodies in the industry in which we or you operate;
- our professional advisors, including our accountants, auditors and lawyers;
- persons authorised by you to receive information held by us;
- a government authority, law enforcement agency, pursuant to a court order or as otherwise required by law; or
- a party to a transaction involving the sale of our business or its assets.

Overseas disclosure. We do not share any personal information, credit information or credit eligibility information overseas. If we are required to disclose this information overseas, we will seek your consent prior to any disclosure.

ACCESS + CORRECTION

Access. We will take reasonable steps to ensure that the personal information, credit information and credit eligibility information we use or disclose is accurate, complete and up to date, having regard to the purpose of the use or disclosure. We rely on the personal information, credit information and credit eligibility information we hold about you to efficiently provide our services, and to schedule and administer our contract and projects. For this reason, it is very important that the personal information, credit information and credit eligibility information we collect from you is accurate, complete and up-to-date. If you require

access to your personal information, please contact us using our contact details set out in this Privacy Policy. You may be required to put your request in writing and provide proof of identity.

Exceptions. We are not obliged to allow access to your personal information if:

- it would pose a serious threat to the life, health or safety of any individual or to the public;
- it would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- it relates to existing or anticipated legal proceedings between you and us and would not ordinarily be accessible by the discovery process in such proceedings;
- it would reveal our intentions in relation to negotiations with you in a way that would prejudice those negotiations;
- it would be unlawful;
- denying access is required or authorised by or under an Australian law or a court/tribunal order;
- we have reason to suspect that unlawful activity, or misconduct of a serious nature relating to our functions or activities has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
- it would likely prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body;
- it would reveal commercially sensitive information; or
- a relevant law provides that we are not obliged to allow access to your personal information (e.g. the Privacy Act).

Response to access request. If you make a request for access to personal information, we will:

- respond to your request within a reasonable period after the request is made; and
- if reasonable and practicable, give access to the personal information as requested.

Refusal of access. If we refuse to give access to the personal information, we will give you a written notice that sets out at a minimum:

- our reasons for the refusal (to the extent it is reasonable to do so); and
- the mechanisms available to complain about the refusal.

Correction. We request that you keep your personal information as current as possible. If you feel that information about you is not accurate or your details have or are about to change, you can contact us using our contact details set out in this Privacy Policy and we will correct or update your personal information.

Response to correction request. If you otherwise make a request for us to correct your personal information, we will:

- respond to your request within a reasonable period after the request is made; and
- if reasonable and practicable, correct the information as requested.

Refusal to correct. If we refuse a request to correct personal information, we will:

- give you a written notice setting out the reasons for the refusal and how you may make a complaint; and
- take reasonable steps to include a note with your personal information of the fact that we refused to correct it.

SECURITY + PROTECTION

Reasonable protections. We have physical, electronic, organisational, technical and procedural safeguards in place for personal information, credit information and credit eligibility information and we will take all reasonable steps to:

ensure that the personal information, credit information and credit eligibility information we collect is accurate, up to date and complete;

ensure that the personal information, credit information and credit eligibility information we hold, use or disclose is, with regard to the relevant purpose, accurate, up to date, complete and relevant; and

protect personal information, credit information and credit eligibility information from misuse, interference and loss or unauthorised access, modification and disclosure.

Security. We store your electronic personal information, credit information and credit eligibility information on a secure server behind a firewall and use security software, multi-factor authentication, network passwords and facial recognition to protect your personal information, credit information and credit eligibility information from unauthorised access, destruction, use, modification or disclosure. The information held and stored on paper is stored in lockable filing cabinets. Our premises has secured entry and monitored alarms. Only authorised personnel may access your personal information for the purposes of disclosure set out in this Privacy Policy.

Obligation to notify. Please contact us immediately if you become aware of or suspect any misuse or loss of your personal information.

DATA BREACHES

Compliance. We are required to comply with the Notifiable Data Breaches scheme under Part IIIC of the Privacy Act.

Investigation and assessment. If we become aware that a data breach in respect of personal information, credit information and/or credit eligibility information held by us may have occurred, we will:

investigate the circumstances surrounding the potential data breach to determine whether a data breach has occurred; and

if a data breach has occurred, carry out a reasonable and expeditious assessment of whether there are reasonable grounds to believe that the relevant circumstances amount to an eligible data breach.

Undertaking. If we become aware that there has been an eligible data breach in respect of information held by us, and the information relates to you or you are at risk from the eligible data breach, we will ensure that either we, or a relevant APP entity that is the subject of the same eligible data breach:

prepare a statement that complies with subsection 26WK(3) of the Privacy Act;

provide a copy of the statement to the Office of the Australian Information Commissioner (**OAIC**); and

if it is practicable, notify you of the contents of the statement, or otherwise publish a copy of the statement on our website and take reasonable steps to publicise the contents of the statement, as soon as practicable after the completion of the preparation of the statement.

COMPLAINTS

Complaint. If you have a complaint about how we collect, use, disclose, manage or protect your personal information, or consider that we have breached the Privacy Act, APPs or CR Code, please contact us using our contact details below. We will respond to your complaint within 14 days of receiving the complaint.

Response and resolution. Once the complaint has been received, we may resolve the matter in a number of ways:

Request for further information: We may request further information from you. Please provide us with as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and determine an appropriate solution.

Discuss options: We will discuss options for resolution with you and if you have suggestions about how the matter might be resolved you should raise these with our Privacy Officer.

Investigation: Where necessary, the complaint will be investigated. We will try to do so within a reasonable time frame. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.

Conduct of our employees: If your complaint involves the conduct of our employees, we will raise the matter with the employees concerned and seek their comment and input in the resolution of the complaint.

Notice of decision. After investigating the complaint, we will give you a written notice about our decision.

OAIC. You are free to lodge a complaint directly with the OAIC online, by mail, fax or email. For more information, please visit the OAIC website at oaic.gov.au.

CONTACT

Contact. Please forward all correspondence in respect of this Privacy Policy to:

Privacy Officer

Aaron Goodall

KLM Spatial

Address: Level 4, 31 Dalmore Drive

Scoresby VIC 179

Phone: 03 9794 1603

Email: privacy@klms.com.au

RELATED DOCUMENTS

Confidentiality Policy

RESPONSIBLE PERSON

Human Resources

Directors

Managers

Employees

Document Control

Date Approved	Version Number	Author	Reviewer	Distributed
25 July 2025	1	Laura Quinlan	Aaron Goodall	Internal