

Lockton Companies Australia - Privacy Notice for Candidates

WHAT IS THE PURPOSE OF THIS DOCUMENT?

This privacy notice describes how we collect, use and disclose personal information about you in accordance with the Australian *Privacy Act 1988* (Cth) (**Privacy Act**) and Australian Privacy Principles (**APPs**) and other privacy laws, as applicable (**Privacy Legislation**).

It applies to all prospective employees and workers (**Associates**) and contractors (**Consultants**) (collectively **Candidates**) of Lockton Companies Australia Pty Ltd (**Lockton**). You are receiving this privacy notice because you are applying for work with us (whether as an Associate or Consultant). It makes you aware of how and why your personal information will be handled, namely for the primary purpose of recruitment, and how long it will usually be retained for.

Lockton is committed to protecting the privacy and security of your personal information. Lockton is an "APP entity" under the Privacy Legislation. An APP entity must not do an act, or engage in a practice, that breaches an APP.

Australian legislative definitions and case law do not use the General Data Protection Regulation (**GDPR**) terminology of 'processor' and 'controller', but by determining the purposes and means of handling the personal information of Australians or candidates applying for employment in Australia, Lockton would likely be considered a data controller under GDPR concepts.

This notice does not form part of any contract of employment or other contract to provide services. In certain circumstances we may require your specific consent to handle your information, those circumstances are identified throughout this Privacy Notice.

AUSTRALIAN PRIVACY PRINCIPLES

We will handle your information in accordance with the Privacy Legislation, including as follows:

1. Managed in an open and transparent way, including by having an easily accessible, clearly expressed and up-to-date Privacy Notice and providing it to you at the time of collection.
2. Collected only if the information is reasonably necessary for, or directly related to, one or more of our functions or activities.
3. If the personal information is sensitive information about you, collected only with your consent and the information must be reasonably necessary for one or more of our functions or activities, or be subject to an exception, such as that the collection is required or authorised by law, or that a permitted general situation exists.
4. Used or disclosed only for the primary purpose for which it was collected, or for a secondary purpose only by consent or where an exception applies, such as that you would reasonably expect us to use the information and it is related to the primary purpose, or that a general or health permitted situation exists in relation to our use or disclosure of the information.
5. If the personal information is sensitive information about you, used or disclosed for an expected secondary purpose only if that secondary purpose is directly related to the primary purpose.
6. Not be used or disclosed for direct marketing purposes unless permitted under APP 7.
7. Kept reasonably accurate, up-to-date, complete and relevant.
8. Reasonably protected from misuse, interference and loss and from unauthorised access, modification or disclosure.
9. Able to be accessed or corrected by you in accordance with APP 12.
10. When no longer necessary for the purposes we have told you about, destroyed or de-identified where required by Privacy Legislation.

THE KINDS OF INFORMATION WE HOLD ABOUT YOU

Personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable.

There are special categories of personal information called "sensitive information" that require a higher level of protection. These categories are personal information concerning a person's: (1) racial or ethnic origin, (2) political opinions, (3) membership of a political association, (4) religious beliefs or affiliations, (5) professional or trade association membership, (6) trade union membership, (7) sexual orientation or practices, or (8) criminal record. Health information, genetic information, biometric information used for identification or identity verification and biometric templates are also sensitive information.

We will seek to collect, store, and use the following categories of personal information (which includes certain sensitive information) about you:

- The information you have provided to us in your curriculum vitae (**CV**) and covering letter;
- The information you have provided on our application form, including:
 - Name;

- Address;
- Email address;
- Contact phone number;
- Date of birth;
- Education and qualifications;
- Employment history and information;
- Information contained in entitlement to work documentation;
- Any information you provide to us during an interview;
- Any other information provided as part of the recruitment process such as references and personality assessment survey results;
- Next of kin and emergency contact information;
- Optionally and with your consent, as part of Lockton's diversity equity and inclusion strategy and initiatives:
 - Gender and gender identity
 - Racial or ethnic origin and nationality
- Reasonable adjustments (such as for attending interviews, including if optionally provided, disability) (if any);
- Public official information.

The information we collect may include a unique government related identifier. We will not adopt this as our own identifier, or use or disclose it except in permitted circumstances. These circumstances include to verify your identity.

Provision of diversity information is voluntary and will not affect your application.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about Candidates by lawful and fair means: through the application and recruitment process, either directly from Candidates, or from publicly available sources including professional networking platforms such as LinkedIn. We may sometimes collect additional information from third parties where it is unreasonable or impractical to collect it directly from you, including from former employers, employment agencies, education history providers, credit reference agencies, background check providers, and providers of personality assessment survey results.

If you fail to provide personal information

If you fail to provide certain information that we need to consider your application (such as evidence of qualifications or work history), we may not be able to process your application successfully. For example, if we require a credit check or references for this role and you do not provide us with relevant details, we will not be able to take your application further. We may also be prevented from complying with our legal obligations in relation to your application. We will tell you if your failure to provide us with certain information prevents us from performing certain activities or meeting legal requirements.

Do we need your consent to collect sensitive information?

Generally, we need your valid consent to collect your sensitive information, and the information we request must be reasonably necessary for our recruitment functions and activities, or for an expected secondary purpose that is directly related to our primary purpose of recruitment. However, we are permitted to collect your sensitive information in some other circumstances if they apply.

These circumstances include that the collection is required or authorised by or under an Australian law or a court/tribunal order, or a permitted general situation exists in relation to the collection of the information by us. Permitted general situations include where we reasonably believe that the collection is necessary to lessen or prevent a serious threat to the life, health or safety of anyone including you, or to public health or safety.

When you apply and where required by or where we otherwise choose to rely upon consent under applicable Privacy Legislation, we may seek your express consent to collect or otherwise handle certain personal information, particularly sensitive information. Any request for consent will be separate from other terms and conditions. In seeking your consent, we will provide you with relevant information, including: full details of the information that we are seeking, why Lockton wants the data, what Lockton will do with it, and how you can withdraw your consent at any time. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us and you should carefully consider whether you wish to consent.

Throughout this notice an asterisk (*) identifies those limited circumstances where we may seek or rely upon your consent in handling your personal information.

HOW WE WILL USE YOUR PERSONAL INFORMATION

We will only use your personal information in accordance with the Privacy Legislation. Most commonly, we will collect and use your personal information:

1. To assess your skills, qualifications, and suitability for the work or role;
2. To carry out background and reference checks, where applicable;
3. To communicate with you about the recruitment process;
4. To keep records related to our hiring processes;
5. To comply with a legal obligation or regulatory requirements;

6. In other circumstances where it is reasonably necessary for us to do so in order to undertake our functions and activities; or
7. Where you provide your express consent for us to do so (see section IV above on consent).

After we receive your CV and application information, we will assess that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to invite you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role or work. If we decide to offer you the role or work, we will then contact your references. We may also carry out criminal records and fitness and propriety checks at a later stage of the process before your appointment is confirmed.

We have set out below, in a table format, a description of the ways we plan to use your personal information, and the bases of our entitlement to do so. This includes specifying what our primary or secondary functions are where appropriate.

Note that we may use your personal information on more than one ground depending on the purpose or activity for its use. Additionally, our reliance on the respective grounds is not equally weighted, therefore reliance on certain bases will be prioritised over others. We will rely on consent only where required if you have completed express consent.

If you need more details about the specific legal ground we are relying on to handle your personal information where more than one ground has been set out in the table below, please contact our Privacy Officer at compliance.au@lockton.com.

Information Handling Type	Applicable Ground
Making a decision about your recruitment or appointment.	→ In accordance with the stated primary purpose (to recruit Candidates) including to ensure your suitability so we can on-board you.
Determining the terms on which you work for us.	→ In accordance with the stated primary purpose and for the secondary purpose of business management to enable us to run our business.
Checking you are legally entitled to work in Australia.	→ In accordance with the stated primary purpose and secondary purposes of business management to enable us to run our business, and to maintain appropriate records needed for defending legal claims.
Ascertaining your fitness to work (where relevant).	→ Enable us to comply with a legal obligation. → In accordance with the stated primary purpose and for the secondary purpose of business management to enable us to run our business, including to plan and manage our workforce, assess your fitness for work, manage health and safety risks, consider, and make reasonable adjustments).
Complying with health and safety obligations.	→ Enable us to comply with a legal obligation. → In accordance with the stated primary purpose and for the secondary purpose of business management to enable us to run our business, including manage health and safety risks. (This includes next of kin and emergency contact information).
Preventing and detecting fraud.	→ Enable us to comply with a legal obligation. → For the secondary purpose of business management to enable us to run our business, including for planning, including accounting and auditing to enable us to run our business).

Equal opportunities monitoring.	→ Enable us to comply with a legal obligation. → In accordance with the stated primary purpose and for the secondary purpose of business management to enable us to run our business (to ensure our business is a fair place to work).
Public official information, credit history and criminal records (see section below for more details on the collection of criminal record information):	→ Enable us to comply with legal obligation (to ensure that business and recruitment and hiring activities are compliant and in line with Australian law and practice including requirements in each State or Territory). → For our recruitment purposes (to ensure the company is a safe place to work and has a competent and qualified workforce). → *Consent of Candidate if required
Collecting, using and disclosing government related identifiers and information contained in identification documents to establish, verify or confirm a Candidate's identity, eligibility to work, qualifications, regulatory status, and suitability for employment or engagement.	→ Enable us to comply with a legal obligation. → In accordance with the stated primary purpose of recruitment (including verifying a Candidate's identity, eligibility to work in Australia, qualifications, professional standing and suitability for the role). → To establish or verify the identity of a Candidate where permitted by applicable Privacy Legislation, including where a government related identifier is reasonably necessary for identity verification purposes.

Change of purpose

We will use your personal information only for the primary purpose for which we collected it, unless we need to use it for a secondary purpose that you would reasonably expect us to use it for. If we need to use your personal information for an unrelated purpose, we will notify you during the recruitment process and we will explain the legal basis on which we are permitted to do so.

Please note that we may handle your personal information without your knowledge or consent, in compliance with the above rules, where this is required or authorised by law.

HOW WE USE INFORMATION THAT IS SENSITIVE INFORMATION

Information that is *sensitive information* requires higher levels of protection. As mentioned above, information about (1) racial or ethnic origin, (2) political opinions, (3) membership of a political association, (4) religious beliefs or affiliations, (5) professional or trade association membership, (6) trade union membership, (7) sexual orientation or practices, or (8) criminal record is personal information that is sensitive information. Health information, genetic information, biometric information used for identification or identity verification and biometric templates are also sensitive information. We need to meet further conditions and satisfy further requirements for collecting and using this type of personal information.

Generally, we may use sensitive information under applicable Privacy Legislation as follows:

1. In limited circumstances, with your express consent;
2. Where the use is required or authorised by or under an Australian law or a court/tribunal order, including where we have legal obligations or exercise rights in connection with employment, social security and social protection, such as in relation to superannuation or tax legislation;
3. In relation to suspected unlawful activity or serious misconduct;
4. Where it is needed to protect your or someone else's health or safety and it is unreasonable or impractical to obtain your consent.

If we obtain specific consent from you to handle any sensitive information about you, your consent must be freely given and you are under no obligation to provide it if you do not wish to.

Why we collect sensitive information

Lockton is committed to the company's diversity, equality, and inclusion strategies and initiatives and as a result would like to understand the needs of its Candidates in more depth. By collecting sensitive information, Lockton gets to know its Candidates better and its services can better cater to them to foster an inclusive and welcoming workplace environment.

Situations in which we will use your sensitive information

We have set out below, in a table format, a description of the sensitive information we plan to use, and why we are permitted to do so. We have also identified what our primary or secondary purposes are where appropriate.

Note that we may process your sensitive information for more than one lawful ground depending on the specific purpose for which we are using your personal information. If you need details about the specific legal ground we are relying on to use your sensitive information, please contact our Privacy Officer by email at compliance.au@lockton.com.

Collection of the following sensitive information is voluntary and primarily for diversity, equity and inclusion reporting and workforce demographic analysis.

Sensitive Information Category	Applicable ground	Additional ground
Racial or ethnic origin information	→ For our recruitment purpose (to ensure the company is a fair place to work and inclusive). In particular, we will use information about your race or national or ethnic origin, religious beliefs or affiliations or philosophical beliefs, or your sexual practices or sexual orientation, to ensure careful equal opportunity monitoring and reporting. → Legal Obligation (duty of care to assess fitness and requirements to make reasonable adjustments and ensure that the company is free from bias, harassment, and discrimination, protecting the rights and interests of identified or identifiable individuals etc).	→ Equality of opportunity or treatment
Religious beliefs or affiliations or philosophical beliefs		
Health (includes information about physical or mental health, including any disabilities)	→ Legal Obligation (duty of care to assess fitness and requirements to make reasonable adjustments and ensure that the company is free from bias, harassment, and discrimination, protecting the rights and interests of individuals).	→ Equality of opportunity or treatment → Employment, social security and social protection laws → Reasons for substantial public interests (with a basis in law)
Sexual Orientation or Practices	→ In particular, we will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process. → To manage health and safety risk and provide support, ensure a fair and inclusive workplace culture/diversity of staff and thought and to ensure meaningful equal opportunity monitoring and reporting). → *Consent of Candidate if required.	

INFORMATION ABOUT CRIMINAL RECORDS

We envisage that we will use information we collect about your criminal record (if any). A criminal record is personal information that is sensitive.

The Commonwealth Spent Convictions Scheme (**Scheme**) allows individuals not to disclose a conviction for a less serious offence after a period of good behaviour, and prohibits unauthorised use and disclosure of information about this conviction. The Scheme also covers pardons and quashed convictions.

There are some exclusions to the Scheme. If an exclusion applies to you, you do not have the right to withhold information about a conviction that would otherwise be spent. There are also state and territory spent conviction schemes. You may consent to having your spent conviction disclosed. If you consent, the above protections against use and disclosure specific to your spent conviction scheme are removed.

We may only collect and use criminal record information where the Privacy Legislation allows us to do so or where we are required to comply with applicable law and/or regulation. Because information about a criminal record is sensitive information, we need to have further justification and satisfy additional grounds for using it.

We may use criminal record information if you have provided your consent, or otherwise for the direct purpose of our recruitment function, or where required or authorised under law or permitted under general situation provisions, such as suspicion of unlawful activity or serious misconduct.

However, we will only collect criminal record information if we consider it appropriate given the nature of the role and where we are legally able or required by law to do so. Where appropriate, we will collect criminal record information as part of the recruitment process. In particular, we will collect information about your criminal convictions history if we would like to offer you the work or role (conditional on checks and any other conditions, such as references, being satisfactory) and we are required or entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the work or role you are being considered for.

We will use criminal record information in the following ways:

Information Use	Applicable grounds	Additional grounds
ASIC and APRA compliance	→ Legal obligation: the processing is necessary for us to comply with the law and regulatory bodies. → Primary or secondary purposes: the processing is necessary to ensure workforce maintains integrity and is fit to engage in regulated activities, manage financial instruments, and adhere to company standards. → *Consent if required.	→ Employment, social security and social protection law → Reasons for substantial public interests (with a basis in law) → Preventing or detecting unlawful acts → Preventing fraud
Fitness and Propriety	→ Legal obligation: the processing is necessary for us to comply with employment law and regulatory bodies. → Primary or secondary purpose: the processing is necessary to ensure workforce maintains integrity and is fit to engage in regulated activities, manage financial instruments, and adhere to company standards.	→ Employment, social security and social protection law → Reasons for substantial public interests (with a basis in law) → Preventing fraud
Other roles with regulatory oversight	→ Contract: Performance of our contract with you such as to monitor your qualification and competence for roles. → Legal obligation: the processing is necessary for us to comply with employment law and regulatory bodies.	→ Employment, social security and social protection law → Public interest provisions in relevant legislation → Equality of opportunity and treatment → Preventing fraud

AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision, or something that is directly related to making a decision, without human intervention. In Australia, automated decision making is regulated under the APPs in certain circumstances. These are if:

1. The APP entity has arranged for a computer program to make, or do a thing that is substantially and directly related to making, a decision;
2. Where that decision could reasonably be expected to significantly affect the rights or interests of an individual; and
3. Personal information about the individual is used in the operation of the computer program to make the decision or do the thing.

Currently Lockton does not use Candidates' personal information for automated decision-making purposes. If Lockton introduces automated decision making to its business operations in Australia, this Privacy Notice will be updated to contain information about:

1. The kinds of personal information used in the operation of such computer programs;
2. The kinds of such decisions made solely by the operation of such computer programs; and
3. The kinds of such decisions for which a thing, that is substantially and directly related to making the decision, is done by the operation of such computer programs.

INFORMATION SHARING

We may have to share your personal information with third parties, including third-party service providers and other entities in the Lockton group, for the purposes of processing your application.

If we do, you can expect a similar degree of protection in respect of your personal information. We require third parties to handle your personal information in accordance with the APPs.

We may transfer your personal information outside Australia in accordance with the APP 8 cross-border disclosure provisions. Before we disclose it to overseas recipients, we will either take reasonable steps such as imposition of contractual obligations to ensure they do not breach the APPs (other than APP 1), or that they are bound by equivalent laws, or that you have consented to and have been expressly informed of any resulting reduction in protections, or in certain other permitted general situations

Personal information may be disclosed to service providers or Lockton group entities located in Australia, the United States, India, the United Kingdom, Singapore, New Zealand and other countries where our service providers operate.

Why might you share my personal information with third parties?

We will share your personal information with third parties as needed where required or authorised by law, where disclosure is necessary to process your application or where the disclosure is related to our primary purpose of recruitment and you would reasonably expect the disclosure.

Which third-party service providers handle my personal information?

"Third parties" includes third-party service providers (including recruitment consultancies, background check providers, credit reference agencies, and other contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers in the context of the recruitment process: assistance with the recruitment process, background checks, credit reference checks, fitness and propriety checks and system maintenance and/or support.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

How secure is my information with third-party service providers and other entities in the Lockton group?

All our third-party service providers and other entities in the Lockton group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the Lockton group?

We will share your personal information with other entities in the Lockton group ("related bodies corporate") as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for preparing budgets, for system maintenance and/or support, hosting of data and analytics.

When might you transfer my information outside Australia?

We may transfer the personal information we collect about you to countries outside Australia, for example, to the United States of America, arising from our use of a talent platform hosted outside Australia for hiring and talent management purposes or in order to perform a contract we have with you if your application is successful. Those transfers would always be made in compliance with APP requirements for cross-border disclosure of personal information. That is, before we disclose it to overseas recipients, we will take reasonable steps such as imposition of contractual obligations to ensure they do not breach the APPs (other than APP 1), or that they are bound by equivalent laws, or that you have given written consent and have been expressly informed of any resulting reduction in protections.

We will also disclose outside Australia if required or authorised by law or in certain other permitted general situations.

DATA AND INFORMATION SECURITY

We have put in place technical and organisational measures to protect the security of your information. In doing this we take into account the state of the art, the costs of implementation and the nature, scope, context and purposes of our information handling practices as well as the likelihood and level of risks to your privacy. We may provide details of these measures upon request, but may need to withhold some for security reasons.

We have an Information Security Policy together with supplementary policies as needed. We take steps to ensure the policies are implemented and we ensure that controls are in place to enforce them. Our Information Security Policy and supplemental policies and measures are updated regularly and improved where necessary.

Third parties will only handle your personal information on our instructions and where they have given sufficient guarantees about their security measures and agreed to treat the information confidentially and to undertake the same security measures that we would have to take if Lockton itself was handling the information. We require any third-party service provider to make available all information necessary to demonstrate compliance with our security measures.

We have appropriate security measures to prevent your personal information, and sensitive information data from being accessed by unauthorised persons, misused, interfered with, modified, lost or disclosed. These measures include both physical measures like high-quality doors and locks with access control measures, alarms, security lighting, and CCTV, and technical measures such as network and system security and device security. From time to time we also perform vulnerability tests, and assess and evaluate the effectiveness of the measures we put in place. We limit access to your personal information and sensitive information to employees, agents, contractors and other third parties who we

have authorised and who have a business need to know. They will only handle your personal information and sensitive information on our instructions, and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Privacy Officer at compliance.au@lockton.com.

We have put in place procedures to deal with any suspected data security breach and will notify you and applicable regulators of a suspected breach where we are legally required to do so, including under the Privacy Act's Notifiable Data Breach scheme.

RETENTION OF PERSONAL INFORMATION

How long will you keep my information for?

We will generally retain your personal information and sensitive information only for as long as it is needed to fulfil the purposes we collected it for, ie. recruitment or to satisfy legal, regulatory, accounting or reporting requirements.

However, we retain unsuccessful Candidates' personal information for 2 (two) years after we have communicated our decision not to appoint you to a role. We retain this information for that period so that we can show, in the event of any legal claim, that we have not unlawfully discriminated against Candidates and that we have conducted the recruitment exercise in a fair and transparent way. If you are not successful and you have given your written consent, we may also retain your personal information with a view to contacting you about other relevant job opportunities that may become available at Lockton from time to time. After this period, we will take steps to securely destroy your personal information or to ensure that the information is de-identified, in accordance with APP 11. We periodically review your personal information and sensitive information and delete anything we no longer need for any purpose or are no longer required by law to retain.

If you have been successful in applying for employment with Lockton and become an Associate, your personal information will then be retained in accordance with our Information Security Policy and Workplace Privacy Notice which will be made available to you upon the commencement of employment.

For Consultants, details of more retention periods for different aspects of your personal information and sensitive information are available in our [Privacy Policy](#). To determine the appropriate retention periods for personal information, we consider the amount, nature, and sensitivity of your information, the potential risk of harm from unauthorised use or disclosure of the personal data, the purposes for which we hold your personal information and whether we can achieve those purposes by other means, and any retention or disclosure requirements under applicable Australian laws including tax laws.

If we deidentify the information we have collected about you, that information is no longer considered personal information and is not subject to the APPs, so we may use it without further notice to you.

RIGHTS OF ACCESS AND CORRECTION

If Lockton holds personal information about you, under certain circumstances, by law Lockton must:

- **Respond to an access request you make** within a reasonable time after you make your request.
- **Provide access to that information** in the manner you request if reasonable and practical to do so, unless specified exceptions apply. We are not required to give access in the following circumstances:
 - we reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual or to public health or public safety; or
 - giving access would have an unreasonable impact on the privacy of other individuals; or
 - the request for access is frivolous or vexatious; or
 - the information relates to existing or anticipated legal proceedings between you and Lockton, and would not be accessible via the process of discovery in those proceedings; or
 - giving access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations; or
 - giving access would be unlawful; or
 - denying access is required or authorised by or under an Australian law or a court/Tribunal order; or
 - both of the following apply:
 - we have reason to suspect that unlawful activity or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in;
 - giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
 - giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
 - giving access would reveal evaluative information generated within Lockton in connection with a commercially sensitive decision-making process.

We will not charge you to make an access request, but we may make a reasonable charge for access. If we refuse access to the information that you have requested, we will write to you to explain our reasons for refusal and the mechanisms you can use to complain about the refusal.

Make corrections to information if requested

If we hold personal information about you, and you request correction of that information or we are satisfied that, in light of the purpose for which it is held, the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, Lockton must take reasonable steps to correct

it and, on request, provide reasonable notification of the correction to any other APP entity to which the personal information was previously disclosed, unless impractical or unlawful to do so. If we refuse to correct your information and you request us to associate the information with notice that it is inaccurate, out-of-date, incomplete, irrelevant or misleading, we must take reasonable steps to make that notice apparent. We will not charge you in connection with correction of your personal information.

What we may need from you

To respond to your access or correction request, we may need to ask you for specific information to help us confirm your identity and ensure your right to access or correct the information. This is another appropriate security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the circumstances where you may have provided your consent to the collection, use, disclosure, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific activity at any time. To withdraw your consent, please contact the Privacy Officer. Once we have received notification that you have withdrawn your consent, we will no longer use, disclose, transfer or otherwise handle your information for the purpose or purposes you originally agreed to, unless we are otherwise permitted or required by law to do so.

PRIVACY OFFICER

We have appointed a Privacy Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our Privacy Officer:

Privacy Officer
Lockton Companies Australia Pty Ltd
Level 18, 45 Clarence Street Sydney NSW 2000, Australia
Email: compliance.au@lockton.com

If you believe Lockton has breached applicable privacy laws or mishandled your personal information, you may lodge a privacy complaint with the Privacy Officer. We will acknowledge your complaint and aim to respond to it promptly and within a reasonable period. You also have the right to make a complaint at any time to the Office of the Australian Information Commissioner (**OAIC**), Australia's privacy regulator.

OAIC contact details

	1300 363 992
	Monday to Thursday
	10 am to 4 pm (AEST/AEDT)
For a phone enquiry	
For an online enquiry	Submit an Enquiry form
Post	GPO Box 5288 Sydney NSW 2001
Fax	+61 2 6123 5145

CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice is updated from time to time as required and published on our Australian website. Sometimes we may also use other methods to notify you about how your personal information is handled.

This version of our Privacy Notice is current as at September 2026. Historic versions can be obtained by contacting our Privacy Officer.

If you have any questions about this privacy notice, please contact the Privacy Officer by email to compliance.au@lockton.com .

<https://global.lockton.com/au/en>

ADELAIDE | BRISBANE | DARWIN | HOBART | MELBOURNE | PERTH | SYDNEY