

## PRIVACY POLICY

NHN Group understands that personal information can be used to identify a person and should only be used by the NHN Group in limited circumstances. Personal Information may refer to information that could reasonably ascertain a person's identity. Other types of information may include but not limited to; a person's health, race or ethnic origin, religious beliefs, sexual preference, or employment records relating to the employment of the employee or a former employee.

NHN Group collects personal information from job applicants and candidates during the recruitment and on-boarding process. NHN Group aims to comply and enforce best practice privacy legislation. This Policy outlines the collection, use and disclosure of personal information we receive from employees, clients, contractors and suppliers or equivalent.

A failure by an applicant to provide any lawfully requested information may result in the processing of the application being delayed or may result in the application being unsuccessful. Any information which is provided by an applicant which is later found to be false may result in the person's application being unsuccessful. If the person is employed, it may result in the termination of that person's employment.

The collection of personal information from applicants may be obtained from a third party source, such as an online recruitment platform or agency. If an applicant is unsuccessful, unless otherwise specified by the applicant to destroy their application, applicant information may be stored for such use as other job openings.

Employees of the NHN Group do not have a general right to access and review their personal records, which are held about them by the NHN Group. An employee may, however, access certain records as specified in statute, about their employment, including:

- basic employment details;
- pay and overtime hours;
- hour arrangements;
- leave entitlements;
- superannuation contributions;
- flexibility arrangements
- annual earnings;
- termination of employment details; and
- transfer of business records.

NHN Group will provide an employee with a copy of these records within 3 business days of the request being made at the premises where the employee works. Alternatively, a copy will be posted to the employee or former employee within 14 days of the request being made.

NHN Group is required to keep employment records for a period of seven years from the date on which an entry is made or from termination of an employee's employment, depending on which happens first. In the case of other records such as tax records, the NHN Group must maintain those records for a continuous period of seven years from the date the entry is made.

Employees of the NHN Group are not permitted to disclose confidential or personal information, which is collected by the NHN Group about its suppliers, customers, agents or contractors. If an employee is not sure whether information is confidential or personal, they must check with the NHN Group, Chief Operating Officer. Confidential and personal Information is information that is not in the public domain. It includes, but is not limited to, the following types of information:

- any personal information about an individual which has been collected by the NHN Group;
- any information about a supplier, customer, agent or contractor of the NHN Group;
- any personal information about an employee or colleague (including a prospective or former employee); and
- any information about the NHN Group's business affairs or business systems.

A breach of this Policy may lead to disciplinary action including, but not limited to, termination of employment.



**Scott Cook**  
Managing Director  
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