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CIVIL  
GOVERNMENT SERVICES  
MINING & METALS  
OIL, GAS & CHEMICALS  
POWER

# Bechtel Western Australia Pty Ltd

## Privacy Policy For Wheatstone Project LNG Plant

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## 1.0 INTRODUCTION

In Western Australia, an individual's privacy is protected in a number of different ways, including;

- the *Surveillance Devices Act 1998* (WA) – regulates the use of surveillance systems in WA generally.
- the *Telecommunications Act 1997* (Cth) - information held by telecommunications companies; and
- the *Privacy Act 1988* (Cth) - personal information held by a Commonwealth government agency and most private sector companies and organisations;.

The *Privacy Act 1988* (Cth) establishes a single national scheme for the collection, holding, use, disclosure and transfer of personal information by Commonwealth government agencies and certain private sector organisations.

## 2.0 OUR OBLIGATIONS UNDER THE PRIVACY ACT 1988

The Privacy Act regulates personal information held by most private sector businesses with an annual turnover of \$3,000,000 or more. In particular, these private sector organisations must comply with the 13 Australian Privacy Principles (**APPs**). Under the APPs, these organisations are required to have clearly expressed policies on their management of personal information. Detailed information relating to the APPs may be located at [www.oaic.gov.au](http://www.oaic.gov.au).

Personal information contained in an employee record (as defined in the Privacy Act) that is used for a purpose directly connected with a current or former employment relationship is exempt from the Privacy Act. This exemption does not cover contractors or unsuccessful applicants for jobs.

## 3.0 DEFINITIONS

In this Privacy Policy:

- **Bechtel, we, us or our** refer to Bechtel (Western Australia ) Pty Ltd, and its affiliates and related companies including Bechtel Construction (Australia) Pty Ltd, performing services in Western Australia in connection with the Project;
- **Project** means the Wheatstone Project LNG Plant;
- **Project-related Sites** refers to Wheatstone Project LNG Plant and all associated facilities and locations where work is being performed for the Project and is under Bechtel's direction;
- **You or your** refers to you as an individual user of Project facilities, or our services;
- The singular includes the plural and vice versa;
- **Act** refers to the *Privacy Act 1988* (Cth);
- **APPs** refers to the Australian Privacy Principles contained in Schedule 1 to the Act; and

- **Personal information** has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

## 4.0 POLICY STATEMENT

Bechtel respects the privacy of personal information you may provide to us and is strongly committed to protecting your privacy when you interact with us. The way we manage your personal information is governed by the Privacy Act 1988 (Cth) and the Australian Privacy Principles established under the Act.

This Privacy Policy applies only to the Project and tells you how we manage any personal information we may collect about you. It does not apply to any other company or organisation, including sub-contractors. We do not accept any responsibility or liability for the privacy practices of such third party organisations. Please note that this Privacy Policy is to be read subject to any overriding provisions of law or contract.

## 5.0 COLLECTION AND USE

### 5.1 TYPES

It is our usual practice to collect personal information directly from the individual. The information we collect will depend on the nature of your dealings with us. The types of personal information we may collect include:

- your name, address, date of birth, telephone number, email address, and employer;
- your image and movements on Closed Circuit Television (CCTV) footage;
- your image and movements on digital recording devices;
- your movement in and out of secured areas by electronic monitoring devices and the use of access cards and RFID tags;
- any information required for security reasons, operational or safety reasons;
- personal information provided when you commence a business relationship with us; and
- any other personal information you provide when you request information, make an enquiry, enter a competition, correspond with us or lodge a complaint.

In some cases, we will collect personal information about you from third parties, such as your employer.

We may also collect sensitive information (which may include health information or other medical information) about you where it is relevant to our business activities (such as when we ask you to submit to a drugs and alcohol test before allowing you onto our site).

## **5.2 PURPOSES THAT WE COLLECT, USE HOLD AND DISCLOSE PERSONAL INFORMATION FOR**

We collect, hold, use and disclose personal information as a condition of entry to the Project-related Sites so that we may carry out our functions in a safe and secure environment. We may do this to:

- process applications effectively for the issue of passes, permissions and permits (including MSICs, and other identification cards);
- assess whether or not any passes, permissions and permits should be cancelled or suspended;
- comply with our legal and regulatory obligations including for maritime transport security (for example, Office of Transport Security (OTS) audits);
- maintain records required for security, maritime, insurance, claims or other legal purposes;
- undertake a drugs and alcohol test on you or a fitness for duty assessment on you, which may involve the collection of your health information and other sensitive information;
- record, investigate and analyse any incidents or occurrences (including potential incidents and occurrences) which occur on Project-related Sites;
- properly identify you and return any lost property misplaced on Project-related Sites;
- keep in contact with you (where you have requested us to do so) and provide you with any information you have requested;
- process any communications you send us (including answering any queries and dealing with any complaints or feedback you have);
- maintain any business relationship we may have with you;
- facilitate any relevant consultation process between you and us;
- manage or enforce a contract or agreement Bechtel has with you or investigate, respond to or defend claims made against, or involving, Bechtel;
- do anything you authorise or consent us to do; and
- take any action we are required or authorised to take by law.

## **5.3 CCTV FOOTAGE AND DIGITAL RECORDING DEVICES**

The reasons we collect CCTV footage or images on digital recording devices include:

- monitoring the safety and security of Project workers, visitors and their property and conducting incident investigations;
- monitoring and maintaining transport security;
- detecting and deterring criminal behaviour on Project-Related Sites; and
- detecting and deterring suspicious, inappropriate or unauthorised use of Project-Related Sites.

## **5.4 ELECTRONIC MONITORING DEVICES**

The reason we track your movement through readers of access card and RFID tag readers in certain locations include:

- monitoring the safety and security of Project workers, visitors and their property and conducting incident investigations; and
- detecting and deterring suspicious, inappropriate or unauthorised access to Project-related Sites.

## **5.5 REFUSAL**

If you refuse to provide us with your personal information, it may not be possible for us to provide you with the services or information you require or we may refuse to allow you to enter (or ask you to leave) any Project-related Site or other premises that are under our control.

## **6.0 DISCLOSURE**

We respect the privacy of your personal information and will only disclose it in accordance with the reasons for which it was collected and otherwise subject to the Privacy Act.

### **6.1 DISCLOSURE TO THIRD PARTIES**

Bechtel may disclose the personal information that it collects to third parties for the purposes set out above, including to:

- our clients, our employees, related bodies corporate, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes;
- our subcontractors, vendors, and clients for the purposes of supporting their recruiting and hiring efforts; and
- any organisation for any authorised purpose with your express consent.

### **6.2 DISCLOSURE TO GOVERNMENT AGENCIES**

We do not give it to other government agencies, organisations or anyone else unless one of the following applies:

- the individual has consented;
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies;
- disclosure is required or authorised by law;

- disclosure will prevent or lessen a serious and imminent threat to somebody's life or health; or
- it is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty.

On that basis we may disclose your personal information to:

- law enforcement agencies (for example, Australian Customs and Border Protection Service (ACBPS), the Australian Federal Police (AFP), the Western Australia Police (WAP));
- government agencies (for example, WorkCover, Office Transport Security, various Federal, State or Local government bodies); and
- any other entity to which we are required or authorised by law to disclose such information (for example, the courts).

## **6.2 DISCLOSURE OUTSIDE OF AUSTRALIA**

Bechtel may disclose the personal information to affiliated entities and third party service providers located overseas for the purposes set out above. We will take reasonable steps to ensure that the overseas recipients of personal information do not breach the privacy obligations as required under the Privacy Act.

Bechtel may disclose personal information to its affiliates and related entities located outside of Australia, including United States of America, United Kingdom, Malaysia, China, and Singapore. An overview of Bechtel's global operations and countries where it has offices can be viewed on <http://www.bechtel.com/offices.html>.

## **7.0 DATA QUALITY**

Bechtel takes steps to ensure that the personal information we collect is accurate, up to date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed, and at other times as necessary.

## **8.0 DATA SECURITY**

Bechtel takes reasonable precautions to safeguard your personal information against loss, unauthorised access, use, modification or disclosure and against other misuse. These steps include password protection for electronic files, securing paper files and physical access restrictions. We may be required by law to retain certain information for a set period of time. When no longer required, personal information is destroyed in a secure manner or deleted.

## **9.0 ACCESS AND CORRECTION**

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

## 10.0 COMPLAINTS

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and your complaint is resolved within a reasonable time (and in any event within the time required by the Act, if applicable).

## 11.0 CONTACT INFORMATION

If you need to contact us for the purposes of this Privacy Policy, you may contact during office hours (between 8.00am to 4.00pm – Monday to Friday):

**Post:** Adam Churchward  
Bechtel Australia Privacy Officer  
Level 3, 540 Wickham Street  
Fortitude Valley, Queensland 4006

**Email:** [privacy@bechtel.com](mailto:privacy@bechtel.com)

**Telephone:** (07) 3167 5340

If you wish to make a complaint about how Bechtel has managed your personal information, please contact us at the aforementioned number. If you are not satisfied with how your complaint has been handled, you can lodge a complaint with the Federal Privacy Commissioner at:

Telephone: 1300 363 992 (if calling from outside Australia including Norfolk Island please call: +61 2 9284 9749)

TTY: 1800 620 241 (this number is for the hearing impaired only, no voice calls)

Post: Director of Complaints, Office of the Federal Privacy Commissioner, GPO Box 5218, SYDNEY NSW 2001

Fax: +61 2 9284 9666

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Website: [http://www.oaic.gov.au/privacy-portal/complaints\\_privacy.html](http://www.oaic.gov.au/privacy-portal/complaints_privacy.html)



## 12.0 AMENDMENTS TO THE PRIVACY POLICY

This privacy policy was last updated on the date shown in Appendix A below.

Bechtel may amend this Privacy Policy at any time and from time to time. Any updated versions of this Privacy Policy will be posted on Bechtel's website and will be effective from the date of posting.

Any alterations shall also be recorded in the following register.

### Appendix A - Revision Record

A. DATE	B. AMENDMENT	C. SIGNATURE	D. COMMENTS