

## FRV Privacy Policy

### Identification and Contact Details of the Person in Charge

FRV SHI B.V., a private company with limited liability (besloten vennootschap met beperkte aansprakelijkheid), having its corporate seat at Amsterdam and its Australian subsidiaries (together, “FRV”, “we” or “us”) is responsible for processing your personal information, whether your personal information is collected through this website or through other channels. The purpose of this privacy policy (the “Privacy Policy”) is to provide the user with information on the rights that protect them according to the Privacy Act 1988 (Cth) (“Privacy Act”). If you have any questions regarding the processing of your data, please contact FRV at the following e-mail address: [privacyaustralia@frv.com](mailto:privacyaustralia@frv.com)

This Privacy Policy develops and gives substance to the Data Privacy principles set out in the FRV Code of Conduct, Section 19.A. Please read this Privacy Policy carefully to understand the approaches and practices regarding your personal information and how it will be treated. By providing us with your personal information, you accept and consent to the practices described in this Privacy Policy. Our website may contain links to sites of other FRV or Abdul Latif Jameel businesses, partner networks, advertisers and subsidiaries. If you follow a link to any of these sites, please note that these sites have their own privacy policies and FRV does not accept any responsibility or liability for these sites or policies. Please check these policies before submitting any personal information to those sites. In any case, when you visit our website, your data will be treated in accordance with the Privacy Act and in no case will automated decisions be taken.

### Purpose

FRV may collect, hold, use and disclose your personal information for the following purposes:

- To consider your employment application and verify your suitability to work with us or access our business. The provision of the required personal information is necessary and failure to provide it will prevent the continuity of the selection process;
- Installation of different cookies and other tracking devices when browsing our website, as explained in the [Cookie Policy](#), to analyse website traffic;
- To contact and communicate with you about your business or other relationship with us or third parties for whom we act or perform functions;
- To decide whether or not to enter into a business relationship with you;
- For your business or other relationship with us or third parties for whom we act or perform functions;
- To provide technology, products and services to you;
- To make payments to you for good or services that you provide to us, including paying your remuneration and other benefits and entitlements;
- To create a contractor record and to have a contractor relationship with you;
- To answer your enquiries and provide any information or documents you request; and
- To update your records and keep your contact details up to date, including records of our interactions with you.

## What personal information do we collect generally?

In connection with the above-mentioned purposes, FRV may collect the following categories of data:

- Identification data: name, surname, postal address, e-mail address, postal code and telephone number;
- Academic and professional data: training/degree, academic history, professional experience, membership of professional colleges or associations, in the case of selection processes;
- Employment data: employment history;
- Location and traffic data;
- Land and property information, including lot, deposited plan, title, price and address;
- Financial details, including bank account numbers and tax details;
- Any other personal information that may be required in order to facilitate your dealings with us.

The following information will be collected automatically for every visit to our website:

- Technical information such as IP addresses used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- Information about your visit, such as all the URLs you have clicked on, on and from our website (including date and time); pages you have visited; page responses time, download errors, duration of visits to certain pages, information about your interaction with the page (such as scrolling, clicks and mouseover) and the methods used to navigate from the page and any telephone numbers used to call any contact telephone number.

Personal information may also be provided by different collaborating entities, such as universities and business schools with which FRV has academic agreements.

If we are not able to collect your personal information, we may be partly or wholly unable to assist or respond to you properly. Depending on the circumstances in which you and we are interacting, we may be unable to consider an employment application, unable to respond to your queries, unable to provide you with products or services to the same standard (or at all), and your use of our website may be limited and not as enjoyable.

## How do we collect your personal information?

Directly from you: Unless it is unreasonable or impracticable to do so, we try to collect your personal information directly from you. We may collect personal information from you through our website, by social media, by telephone, through letters and emails, or in person.

From third parties: We may also collect personal information about you from third parties, including your authorised representatives, our agents or third parties with whom we have business relationships. If you are applying for employment with us, we may also collect personal information from your current and former employers, educational institutions and (with your permission) your referees.

## How do we store and secure your personal information?

**Securing your information:** We store information in different ways, including in hardcopy and electronic form. Our security safeguards include:

- technical and organisational solutions such as security controls and internal processes to help us protect your information from misuse, interference, loss or unauthorised access, modification or disclosure;
- confidentiality requirements for employees and contractors;
- document retention policies, systems and site access restrictions; and
- website security systems, including firewalls and data encryption on our websites (see our Terms of Use at <https://frv.com/en/terms-of-use/> for details).

**Information held overseas:** We may hold overseas or disclose to third parties overseas your personal and credit related information. Your personal and credit related information may be held in Spain, the Netherlands and Ireland or any other EU country where Microsoft datacentres are located. If your personal information is held in other overseas countries in the future, we will update this policy.

Where your personal or credit related information is held overseas, we or the overseas service providers may disclose your information when required by Australian or foreign law.

### **How long do we keep your information?**

The user's personal information will only be kept for the time necessary to provide the services indicated above and in accordance with record-keeping laws and standards. For example, if an application for employment with us is not successful in the first instance, the curriculum vitae data will be kept for two years from the day it was last updated, unless you request its deletion.

### **Communication of data to third parties**

We may disclose personal information for the purposes described in this privacy policy to:

- our employees and affiliates;
- third party suppliers and service providers (including providers who assist us to operate our business and provide our technology, products and services to you);
- professional advisers, dealers, agents and business partners;
- payment systems operators; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

We may also disclose your personal information to others where:

- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

### **User's rights (how to access personal information and seek correction)**

You may exercise the following rights:

- Right of access: You have the right to access the personal information that we hold about you. When you request information we hold about you, we will respond to all requests for

access within a reasonable period. We may refuse to give you access to your personal or credit-related information in circumstances permitted under the Privacy Act such as where giving access may have an unreasonable impact on the privacy of others.

- Right of rectification: You have the right to ask us to correct your personal information if it is inaccurate, out of date, irrelevant, misleading or incomplete. We will consider whether the information requires correction and notify you of our review.

You can exercise your rights by indicating the right you wish to exercise and the identification data by sending an email to the following address: [privacyaustralia@frv.com](mailto:privacyaustralia@frv.com)

If you wish to access your personal information, the process is as follows:

- Before we provide you with access to your personal information we may require some proof of identity. When contacting us to request access to or correction of any personal information we hold about you, we ask that you provide us with as much detail as you can about the information in question as this will help us to retrieve it.
- We will not charge you for requesting access to your personal information.
- After we have investigated the request for access we will advise you what personal information we hold and provide details of that personal information.
- We will comply with all reasonable requests by you to provide details of the personal information that we hold in the requested format within 30 days of receiving the request.
- If we do not provide access to the information we will provide written reasons setting out why we do not believe we need to provide access. We will also advise you about mechanisms to complain about the refusal to provide personal information.

If you wish to correct your personal information, the process is as follows:

- If we hold personal information about you and we are reasonably satisfied (having regard to the purpose of any personal information) that the information is inaccurate, out of date, incomplete, irrelevant or misleading, or we receive a request to correct the information, we will take reasonable steps to correct the information.
- We may need to seek additional information from you and other sources in the course of verifying the information.
- If we correct personal information that we have previously disclosed, we will take reasonable steps to notify the entity to which we disclosed the information of the correction.
- We may not always make amendments to an individual's personal or credit information. If we do not make the correction to the information we will provide written reasons setting out why we do not believe we need to make the correction. We will also advise you about mechanisms to complain about the refusal to correct the personal information.
- After notifying you of our refusal to correct personal information, you may request us to associate a statement with the record that contains the personal information to the effect that you consider the information to be inaccurate, out of date, incomplete, irrelevant or misleading. We will take reasonable steps to associate that statement into our records.

## **Notifiable Data Breach**

If we become aware that there are reasonable grounds to suspect that your personal information that we hold, is accessed, or disclosed without authorisation or is lost, our Privacy Officer will notify you directly and the Office of the Australian Information Commissioner (OAIC) within 30 days of becoming aware, where it is likely to result in serious harm to you.

## How to make a complaint

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can email [privacyaustralia@frv.com](mailto:privacyaustralia@frv.com). Please include your name, email address and/or telephone number and clearly describe your complaint.

We request that complaints about breaches of privacy be made in writing, so that we can be sure about the details of the complaint. We will attempt to confirm with you as appropriate and necessary your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

If you think that we have failed to resolve the complaint satisfactorily, you can refer your complaint to our Communications Channel or to the Office of the Australian Information Commissioner (OAIC).

The Company maintains a confidential and anonymous external Communications Channel, through which any employee or Third Parties can report about concerns or violations to the Code of conduct and Compliance policies. The communications will be sent to the following e-mail address [privacyaustralia@frv.com](mailto:privacyaustralia@frv.com). The communications received will be analyzed by a specialized external service, and if appropriate, admitted for processing, giving them follow-up in accordance with the code of conduct complaints procedure.

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You have the right to file a complaint to the OAIC if you believe that a breach of data protection legislation may have been committed with respect to the processing of your personal information by visiting [www.oaic.gov.au](http://www.oaic.gov.au), calling 1300 363 992 or by emailing [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

## Cookies

FRV will only use the data storage and recovery devices (cookies) once users have given their prior consent to do so through the pop-up-window that appears when our website is first accessed. You can find out more about how we use cookies in our [Cookie Policy](#).

## Changes to this Privacy Policy

This Privacy Policy may be amended from time to time and the new version will be posted on this page with the updated date. You should check our website from time to time for changes as they will apply to you. By continuing to provide information, use our website and, where applicable, confirm your acceptance of the Privacy Policy, you agree to any changes to this Privacy Policy.

## Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to our Privacy Officer at [privacyaustralia@frv.com](mailto:privacyaustralia@frv.com).

**Date of Policy: April 2024**