

# NORMAN DISNEY & YOUNG, A TETRA TECH COMPANY

## DATA PRIVACY POLICY

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At Norman Disney & Young (NDY), A Tetra Tech Company, we are committed to protecting your personal information and being transparent about what we do with it. We are committed to using your personal information in accordance with all applicable laws concerning the protection of personal information and not to do anything with your information you wouldn't reasonably expect.

This Privacy Policy explains:

- how NDY may obtain your personal information;
- what information we collect;
- how we will use that information;
- who we share your information with;
- how long we retain your information ;
- how we use cookies to provide services to you or to improve your use of our websites;
- and what your legal rights are.

We do not knowingly collect data relating to children through our website or any other company media.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

## ► How do we obtain your personal information

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply to work with us as an employee or as a consultant on one of our projects
- request our services;
- subscribe to our service or publications;
- request marketing to be sent to you; or
- enter a competition, promotion or survey.

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and similar technologies.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:

- (a) analytics and search providers such as Google;
- (b) recruitment agencies and online job messaging boards; and
- (c) through our Employee Referral programme

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## ► What information do we collect?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account.
- **Transaction Data** includes [details about payments to and from you and other details of products and services you have purchased from us].
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes any information you have given us on your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

You may chose to provide certain **Sensitive Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We may also collect information about criminal convictions and offences, or carry out psychometric testing as part of recruitment.

Before accepting or collecting sensitive personal data we will make it clear to you what purposes the data will be used.

## ► How do we use your information?

We will only use your personal data for the purposes it was intended. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at [data.info@ndy.com](mailto:data.info@ndy.com)

## ► Who do we share your information with?

When we collect your personal information we use strict procedures and security features to prevent unauthorised access. However, no data transmission over the Internet can be guaranteed to be 100% secure. Accordingly, while we try to protect your personal information, NDY cannot guarantee the security of any information you transmit to us and you do so at your own risk.

We will not sell your details to any third parties, but we may sometimes share your information with our trusted service providers (marketing, payroll, superannuation/pension administration etc.) who are authorised to act on our behalf, our

trading companies, and associated organisations who work on our behalf, or whom we work with in partnership to deliver our services.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will transfer the personal information we collect about you to the following countries: Australia, Canada, NZ, UK and the USA as well as other countries where we have a legitimate business interest in order to perform our contract with you.

Countries where we may transfer your data will provide varying levels of protection for your personal information. However, to ensure that your personal information does receive an adequate level of protection we have put in place corporate policies and procedures to ensure that your personal information is treated by those third parties in a way that is consistent. If you require further information about these protective measures, you can request it from [data.info@ndy.com](mailto:data.info@ndy.com)

## ► How long will you retain my personal information for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers and suppliers (including Contact, Identity, Financial and Transaction Data) for at least seven years after they cease being customers or suppliers for tax purposes.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## ► What are your legal rights?

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Contact details: [data.info@ndy.com](mailto:data.info@ndy.com)