



PRIVACY POLICY

Wallis Drilling Pty Ltd, ACN 009 091 070 (referred to as **we, us, or Wallis Drilling**) is committed to managing personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (referred to as **privacy law**).

We are committed to being transparent about how we handle your personal information, so you can engage with us confidently and securely.

This Privacy Policy (**Policy**) explains how we handle personal information about individuals, including clients, job applicants, contractors, visitors to our premises or those of our clients or business partners, and users of our website. This Policy also applies to employees to the extent authorised by privacy law and should be read together with any employee-specific privacy notices, workplace policies, or contractual obligations that may apply.

By providing us with your personal information, you consent to its collection, storage, use, and disclosure in accordance with this Policy.

This Policy provides important information about:

- how and why we collect, use, store and disclose your personal information;
- how you can access and correct the personal information we hold about you; and
- how you can make a complaint about the way we have handled your personal information.

Wallis Drilling requires that all aspects of its business operations and all of our employees, officers and contractors comply with this Policy and the privacy laws.

We may change this Policy from time to time, without notice. You may obtain a copy of the up-to-date version of this Policy from our website or by contacting our HR Manager using details provided at the end of this document.

1. What is personal information?

“**Personal information**” refers to information or an opinion that identifies you. The information or opinion will still be considered “personal information” whether it is:

- (a) factually true or false; or
- (b) is available by way of spoken word or recorded in writing or any other format.

Some examples of personal information include a person’s name, home address, email address, date of birth or bank account details.

Certain types of personal information are given a higher level of protection by privacy law, and called “**sensitive information**”. Some examples of sensitive information include information about a person’s health, ethnic origin, religious beliefs or criminal record.

2. What “personal information” is not covered by this policy?

- 2.1 Like privacy law, this Policy does not apply to the handling of personal information of an employee of Wallis in a manner that is directly related to the employment relationship. An employee record means a record of personal information about a current or former employee, and includes medical information or records.
- 2.2 In any case, Wallis Drilling remains committed to managing all employee records responsibly and securely. Current or former Wallis Drilling employees should refer to their individual contract of employment, their direct report or other relevant Wallis Drilling policies for more information on our handling of employee records.
- 2.3 Privacy laws will apply to the way we handle sensitive information where it relates to a job applicant or contractor.

3. Why do we collect, use, disclose and store your personal information?

- 3.1 We collect, use, disclose and store your personal information where reasonably necessary to pursue at least one of our primary commercial functions or activities (e.g. the provision of drilling services for exploration and mining projects) or where required by or authorised under law or a court/tribunal order.
- 3.2 Personal information that we collect, hold, use and disclose about you is typically used to provide our services to you and / or our clients, including:
 - (a) to provide and manage equipment and labour services;
 - (b) to manage our client and business relationships, process payments and manage accounts;
 - (c) undertake recruitment or human resources activities, including to help confirm a job applicant’s suitability for a role or assess an employee’s suitability for ongoing or specific tasks;
 - (d) to meet our contractual and/or legal/regulatory obligations.
- 3.3 We may also collect, use, disclose or store your personal information to undertake activities which are *associated* with our primary commercial functions, for example:
 - (a) planning, developing, improving and expanding our facilities and services;
 - (b) informing you of our activities, events, facilities and services;
 - (c) managing our employees and/or contractors;
 - (d) carrying out investigations or considering complaints;
 - (e) insurance-related purposes; and
 - (f) assisting government and law enforcement agencies or regulators.

4. What if you do not want to give us your personal information?

- 4.1 You are in control of who you share your personal information with. In some cases, if you do not provide the information we need, we may be unable to provide our goods or services, communicate with you, respond to your enquiries or handle incidents with clarity.
- 4.2 Upon request, we may offer you the option of not identifying yourself, or of using a pseudonym, provided it is lawful and practicable to do so.

5. What personal information do we collect and store, and how?

- 5.1 The types of personal information we collect will depend on the nature and purpose of our interaction with you (for example, when you use any of our services, visit our website, contact us or otherwise interact with us). We maintain both paper-based and electronic records of personal information (as applicable).
- 5.2 In relation to our core services (and associated support services), we may collect personal information about:
 - (a) current and prospective clients;
 - (b) people enquiring about our business;
 - (c) visitors to our website;
 - (d) service providers and contractors engaged by Wallis Drilling;
 - (e) job applicants;
 - (f) individuals who visit our premises or the premises of our clients or business partners;
 - (g) employees of Wallis Drilling.
- 5.3 We may collect the following types of personal information from you:
 - (a) **identity details** (e.g. name, age, date of birth, nationality, marital status, audio and/or visual recordings);
 - (b) **contact details** (e.g. residential and/or postal address, email address, telephone number);
 - (c) **service-related details** (e.g. transaction history with us, accident and incident information, your employees' names);
 - (d) **technical details** (e.g. your IP address, the types of devices you use to access our website, device attributes, browser type, operating system, location data and other pages you have visited);
 - (e) **financial details** (e.g. bank account or credit card information);

- (f) **work-related details** (e.g. employment history, work experience, training/education, qualifications, superannuation information, licences and memberships);
- (g) **government identifier details** (e.g. driver's licence, tax file number, passport).

5.4 Typically, Wallis Drilling only collects sensitive information about:

- (a) job applicants and prospective contractors during recruitment processes; and
- (b) employees and contractors for legitimate purposes relating to their employment or engagement relationship with us.

5.5 The types of sensitive information we usually collect includes:

- (a) health information (including medical history) relevant to a job applicant, an existing employee's ability to perform work for us or incident management;
- (b) criminal record information (e.g. national police clearance), including any disclosable court outcomes and pending charges from all Australian police jurisdictions; and
- (c) nationality information in the form of residency or visa details.

6. How do we collect personal information about you?

6.1 Wallis Drilling will collect your personal information directly from you whenever you interact with us and where information is reasonably necessary for our functions or activities. For example, we may collect this information when you:

- (a) enquire about, or purchase, our goods or services;
- (b) apply for a job with us;
- (c) attend our premises or the premises of our clients or business partners;
- (d) access our website or our social media pages.

6.2 We may also collect personal information from third parties where you would reasonably expect the personal information to be collected or where it is unreasonable or impracticable to collect it directly from you. For example:

- (a) when direct collection might jeopardise the purpose of collection or the integrity of the personal information collected; or
- (b) when the time and cost involved in collecting directly from you is excessive.

6.3 We will only collect your sensitive information with your consent, unless the collection is required or authorised by law.

7. Do we use monitoring/surveillance devices to collect personal information?

7.1 We may also collect personal information through the use of monitoring systems, such as:

- (a) Closed-Circuit Television (CCTV) cameras attached to our equipment at our sites and at client sites where we provide services. These cameras may capture personal information, including images and video recordings of individuals who visit our sites or the sites of our clients where we provide services.
- (b) In-vehicle monitoring systems installed in some company vehicles, which may record images, video, and location data. These systems may capture personal information, including images and video recordings of individuals interacting with our vehicles.

7.2 We collect this information to monitor and ensure the safety and security of our operations. This includes protecting people, property, and equipment, and complying with workplace health and safety obligations. Where applicable, we also comply with the requirements under privacy law to notify individuals that their image may be captured before recording.

7.3 We do not record in areas where individuals have a reasonable expectation of privacy (such as bathrooms or change rooms), and audio recording is disabled unless expressly permitted by law.

8. Do we collect information from our website or other digital platforms?

8.1 Wallis Drilling may collect personal information about you when you use and access our website.

8.2 While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

8.3 We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

8.4 Our website may contain links to external websites. We are not responsible for the privacy practices or collection and use of personal information by third party websites. Please read any terms and conditions and privacy policies that apply to relevant third party websites to ensure you understand and agree to the way your personal information will be used by these third party websites to interact with us.

9. Do we use your personal information for direct marketing?

9.1 Wallis Drilling may use or disclose personal information (other than sensitive information) for marketing and promotional information in relation to the goods and services we offer, provided:

- (a) we collected the information directly from you;
 - (b) you have consented to, or would reasonably expect us to, use or disclose the information for that purpose; and
 - (c) you have not opted-out in receiving marketing communications from us by following the opt-out instructions provided in the communication.
- 9.2 If you have previously consented to us using your personal information for direct marketing purposes, you may opt-out at any time by
- (a) by emailing us at our contact details below; or
 - (b) clicking the 'unsubscribe' link at the bottom of any direct marketing email you might receive.
- 9.3 Our direct marketing communications and information may take the form of emails, SMS, mail or other forms of communication, in accordance with the *Spam Act 2003* (Cth) and the *Do Not Call Register Act 2006* (Cth).

10. How and why do we use and/or share your personal information?

- 10.1 Wallis Drilling will only use or share your personal information for the purpose it was collected. This ordinarily includes to:
- (a) provide our services (e.g. provision of equipment, vehicles and labour hire to clients);
 - (b) run our business (e.g. service delivery planning, billing, investigating complaints/incidents);
 - (c) send you information about services you might be interested in;
 - (d) ensure quality assurance, training, and compliance;
 - (e) carry out analytics, business improvement and reporting; or
 - (f) process job applications, onboard employees and engage with contractors.
- 10.2 We may also use or share your personal information for another (secondary) purpose, where:
- (a) you have provided your consent for us to do so;
 - (b) where we are authorised or required by or under law;
 - (c) you would reasonably expect us to use it for that other purpose, and the information is related to the primary purpose of collection or, in the case of sensitive information, directly related to the primary purpose; or

- (d) we believe the other disclosure is reasonably necessary for enforcement-related activities.

11. Who do we share your personal information with?

11.1 Wallis Drilling may disclose personal information for the purposes described in this Policy to the following third parties (without limitation):

- (a) clients (e.g. for the provision of equipment, vehicles and labour hire);
- (b) suppliers, contractors and service providers (e.g. labour hire providers, software service providers);
- (c) our agents, professional advisers, or business partners (e.g. insurance brokers, pre-employment medical assessors);
- (d) government agencies, law enforcement agencies, or as required, authorised or permitted by law (e.g. insurers).

11.2 From time to time, third parties may request access to the sensitive information we hold about our employees and/or contractors. For example, this may include our:

- (a) existing or potential clients engaging with us for the purpose of meeting site access or work health and safety requirements;
- (b) your treating health practitioner or an independent health practitioner for the purpose of assessing your fitness for work, any reasonable adjustments that are required or to assist in administering workers' compensation; or
- (c) workers compensation bodies, insurers and insurance brokers for the purpose of administering workers' compensation matters.

11.3 However, we will only disclose sensitive information with your consent or other appropriate authority. Refusal to provide consent may limit our ability to progress the relevant engagement or matter.

11.4 Where it is unreasonable or impracticable to obtain consent (for example, to protect life, health or safety), we may use or disclose personal information to contact next of kin, medical providers, emergency services or law enforcement.

11.5 If ownership or control of all or part of our business changes, we may transfer your personal information to the new owner.

11.6 We do **not** sell or rent personal information to third parties.

12. Do we share personal information to overseas recipients?

12.1 From time to time, Wallis Drilling may disclose personal information to an overseas recipient in accordance with this Policy. This generally occurs where data is being stored and accessed by way of cloud computing. For example, where our clients require us to

enter personal information into a database or computer systems controlled by them which stores or processes data in servers/clouds overseas.

- 12.2 Before disclosing personal information to an overseas recipient, we will take such steps as are reasonable in the circumstances to ensure that the overseas recipient is contractually bound to comply with Australia's privacy law, unless the recipient is already subject to privacy related legal obligations which are substantially similar to Australia's privacy law. We may otherwise disclose personal information to an overseas recipient if you have provided your consent to such disclosure or we are required or authorised to make such disclosure by law.

13. Do we use personal information for automated decision-making processes?

- 13.1 Wallis Drilling may use personal information in automated decision-making (**ADM**) processes for the purposes of workplace safety and security. These processes may involve computer programs that make or substantially assist in making decisions which could reasonably be expected to affect an individual's rights or interests.
- 13.2 The computer programs (e.g. CCTV, in-vehicle monitoring systems or other automation systems) used in these processes may handle the following kinds of personal information:
- (a) visual and/or audio recordings;
 - (b) vehicle telemetry and behavioural data (e.g. speed, location, and driving patterns);
 - (c) metadata and other system-generated information associated with Wallis' vehicles, premises, machinery, or company equipment.
- 13.3 The computer programs may automatically identify or flag potential safety, emergency or policy issues and generate reports or alerts that assist management in decision-making. All automated outputs are reviewed by a human before any final decision is made that could significantly affect an individual. The types of decisions that may be made as a result include loss of site access or a written warning.
- 13.4 Individuals are welcome to contact us for further information about how personal information is used in ADM or to request a review of any decision that has been made or substantially assisted by an automated process.

14. How do we safeguard your personal information?

- 14.1 Wallis Drilling takes reasonable steps to ensure the personal information we hold is protected from misuse, interference and loss, as well as unauthorised access, modification or disclosure.
- 14.2 We mainly store information in computer systems and databases operated either by us or our external service providers. If we use an external service provider to store information on our behalf, we take reasonable steps to ensure the information can be accessed and retrieved in an appropriate format. Some information about you is recorded in paper files that we store securely.

- 14.3 Access to personal information is restricted to employees who require it to perform their role. We use a number of physical, administrative, and technical measures to safeguard and protect your personal information including:
- (a) third party cybersecurity software products;
 - (b) using encryption and other cryptographic controls;
 - (c) storing hardcopy information on secure premises, only accessible by authorised employees/contractors;
 - (d) limiting access to electronic systems on which information is processed and stored to authorised employees/contractors;
 - (e) engaging external IT service providers to support appropriate data backup arrangements and to assist with identifying, reporting on, and addressing system errors where required;
 - (f) requiring all employees/contractors to periodically reset passwords and complete training about information security; and
 - (g) monitoring and regularly reviewing our practice against our own policies and against industry best practice.
- 14.4 If we hold personal information about you which we no longer require, we will take reasonable steps to destroy the information or ensure that it is de-identified (unless we are required or authorised by law).
- 14.5 In the event personal information held by us has been accessed, disclosed without authorisation, or is lost, we will take immediate action to contain, assess and remediate the incident in accordance with our data breach response procedure.

15. Quality of personal information

- 15.1 We will endeavour to take reasonable steps to ensure that the personal information that we collect is accurate, up-to-date and complete, including (without limitation):
- (a) ensuring records are updated promptly and new personal information is added to relevant existing records; and
 - (b) reminding individuals to update their personal information when we engage with them.
- 15.2 If you think that the personal information we hold about you might be out of date and needs to be corrected, please contact us using the details located below.

- 16. How can you request us to provide access to or correct your personal information?**
- 16.1 You have the right to ask for access to personal information that we hold about you, and to ask that it is corrected. You can ask for access or correction by contacting our HR Manager on the contact details below.
- 16.2 Once contacted, we will endeavour to respond to you in relation to your request within 30 days.
- 16.3 We will give you access to your personal information and take reasonable steps to correct it if we consider it is incorrect, unless there is a law that allows or authorises or requires us not to.
- 16.4 Upon a request for access or correction being made, we will ask you to verify your identity before we give you access to your information or agree to make any corrections to it. We may also request the following information to assist us process your request:
- (a) your contact details;
 - (b) whether the personal information relates to you or another person (if the information relates to another person, you will need to demonstrate that you have their authority to act on their behalf);
 - (c) what information you are seeking to access (e.g. dates, location, subject matter and any other information that will help us identify the information you are seeking);
 - (d) the reason(s) you wish to access the information;
 - (e) your preferred method of receiving the information (e.g. in writing via email or relayed in person).
- 16.5 If we refuse to correct your personal information, you can ask us to associate (e.g. attach or link) a statement with your personal information, to the effect that you believe the information is incorrect and why.
- 16.6 Please note, there are some circumstances under privacy law that requires or authorises us to refuse a request to access or correct the personal information we hold. If we refuse your access or correction request, we will notify you in writing setting out our reasons for doing so.
- 16.7 We may charge reasonable fees to cover our costs associated with responding to a request for personal information. The fees will be determined on a case-by-case basis and we will inform you of the likely fees before they are incurred. We will not charge fees for requests for the correction of personal information or for associating the statement with the personal information.

17. How can you make a complaint about the way we have handled your personal information?

17.1 If you have a complaint about the way in which we have handled your personal information in compliance with applicable law or dealt with any privacy issue (including your request for access or correction of your personal information) you should contact our HR Manager using the details set out below.

17.2 In making a complaint, we may request that you provide us with the following information:

- (a) your name;
- (b) your preferred contact details (e.g. email address and/or telephone number)
- (c) a clear description of your complaint or concerns; and
- (d) any supporting material.

17.3 Once we have received your complaint, we will take steps to consider your complaint and respond to you within a reasonable period of time (generally 30 days).

17.4 We may contact you by telephone or in writing to:

- (a) seek further information about your complaint; or
- (b) notify you of the outcome of our investigation

17.5 If you remain unsatisfied with the way we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner for guidance on alternative courses of action which may be available. The OAIC may be contacted as follows:

Online form: www.oaic.gov.au/contact-us

Telephone: 1300 363 992

Post: GPO Box 5288, Sydney NSW 2001

Fax: +61 2 6123 5145

18. How can you contact us?

18.1 If you have any questions about this Policy, please contact our HR Manager on the details below:

Email: hr@wallisdrilling.com.au

Telephone: 08 9374 1111



Address: 220 Bushmead Road, HAZELMERE WA 6055

Post: PO box 3579
Midland WA 6056

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1.0	16 March 2026	16 March 2027	HR Manager	Frances O'Grady