

Privacy Policy

Policy Owner:	Chief Executive Officer
Process Owner:	General Counsel
Approval Authority:	ARRC Group Board of Directors via Audit and Risk Committee
Effective Date:	31 March 2026
Review Date:	31 March 2028
Version:	1.0
Applies To:	All Directors, officers, employees, contractors, consultants, service providers and any other persons performing work for, with, or on behalf of the ARRC Group.

Definitions and Interpretation

ARRC Group means any wholly owned or controlled entity of Council, or a subsidiary of any wholly owned or controlled entity of Council, related to the ARRC Project (including ARRC Organics (ABN 88 691 906 297), ARRC Gold Coast (once established by Council) and other proposed entities).

Staff is a term that encompasses all ARRC Group Staff including permanent, fixed term, trainees, apprentices, casual employees, contingent labour, contractors or subcontractors, work experience students, hosted trainees, volunteers, consultants, vocational placements, Board members or any other person who provides services on a paid or voluntary basis to the ARRC Group.

Purpose

The purpose of this Policy is to outline the ARRC Group's commitment to protecting personal information in accordance with applicable privacy legislation. This includes compliance with the *Privacy Act 1988 (Cth)*, including the Australian Privacy Principles (APPs), and, where applicable to public functions or partnerships, the *Information Privacy Act 2009 (Qld)*.

This Policy ensures that personal information is collected, used, stored, and disclosed lawfully, transparently, and ethically, and that the rights of individuals to privacy and data protection are respected and upheld.

Scope

This policy applies to all Staff across the ARRC Group and governs the handling of personal information in connection with all ARRC Group activities, functions and operations.

This Policy applies to:

- All personal information collected, held, used, stored, disclosed or otherwise processed by or on behalf of the ARRC Group in any form, including electronic, paper-based, visual, audio, photographic or digital records.
- All individuals performing work for, with, or on behalf of the ARRC Group, including:
 - Directors and officers;
 - employees (permanent, temporary, casual or fixed-term);
 - contractors, subcontractors, consultants, professional advisers, agency staff, volunteers; and
 - any third parties who access, manage, or process personal information under an arrangement with the ARRC Group.
- All ARRC Group activities and functions, including:
 - operational, commercial, governance, regulatory, and corporate functions;
 - stakeholder, community, public sector, and partner engagements;
 - procurement, recruitment, employment, and contractor management activities; and
 - the use of information systems, platforms, devices, and data-sharing arrangements.

This Policy applies to the handling of personal information:

- in the workplace or at any ARRC Group site;
- during work-related activities, events, meetings, travel, conferences, and engagements; and
- outside normal working hours or physical workplaces where there is a connection to work, including remote work, digital activity, and online or social media conduct, where such conduct involves, accesses, references, or may impact personal information held by the ARRC Group.

This Policy also applies to third-party arrangements, including outsourcing, service provision, partnerships, or collaborations, where personal information is shared with, received from, or processed by external parties on behalf of the ARRC Group.

Compliance with this Privacy Policy is a condition of employment or engagement of all Staff and forms part of the ARRC Group's broader governance, risk and ethical framework, as does the Employee Code of Conduct.

Policy Statement

The ARRC Group is committed to responsible data stewardship and protecting the privacy of individuals. The company will ensure compliance with:

- the *Privacy Act 1988 (Cth)* and the 13 Australian Privacy Principles (**APPs**), which regulate the handling of personal information by private sector entities;
- the *Information Privacy Act 2009 (Qld)*, including its Information Privacy Principles (**IPPs**) and National Privacy Principles (NPPs) where applicable through contractual arrangements or partnerships with public sector bodies;
- ARRC Group's contractual, ethical, and governance obligations.

The ARRC Group will take reasonable steps to ensure that all personal information is managed in a manner that promotes public confidence, supports legal compliance, and enables efficient, transparent business operations.

Where an ARRC Group entity is not directly subject to State privacy legislation, compliance with such legislation will apply only to the extent required by contract, funding agreement, or partnership with a public sector body.

Privacy obligations

The ARRC Group will:

Collection of Personal Information

- Only collect personal information that is necessary for lawful business functions.
- Collect information directly from the individual where reasonable and practical.
- Provide clear notices of collection, including the purpose, legal basis, and how the information will be used or disclosed.

Use and Disclosure

- Only use personal information for the purpose it was collected, or for a related secondary purpose that the individual would reasonably expect.
- Not disclose personal information to third parties unless the individual has consented, it is required or authorised by law, or it is otherwise in accordance with the APPs or IPPs.
- Ensure any overseas disclosure complies with APP 8 and has adequate privacy protections in place or where possible avoid such overseas disclosure.
- Ensure that third parties who handle personal information on behalf of the ARRC Group are subject to contractual privacy, confidentiality and data-security obligations consistent with this Policy.

Data Quality and Security

- Take reasonable steps to ensure that personal information is accurate, complete, and up to date.
- Implement and maintain appropriate technical and organisational security controls to protect personal information from misuse, interference, loss, or unauthorised access.

Access and Correction

- Provide individuals with access to their personal information on request, except where exemptions apply.
- Correct personal information where it is inaccurate, out-of-date, incomplete, irrelevant, or misleading.

Storage and Retention

- Retain personal information only for as long as necessary to fulfil its lawful purpose.
- De-identify or securely destroy personal information when it is no longer required.

Privacy Impact and Risk Management

- The Chief Executive Officer (or delegate) is responsible for ensuring that Privacy Impact Assessments (PIAs) are undertaken where required.
- Incorporate privacy into risk assessments and governance frameworks.

Breach Notification

- All personnel must immediately report any actual or suspected data breach in accordance with ARRC Group procedures to enable timely assessment and notification.
- Notify affected individuals and the Office of the Australian Information Commissioner (**OAIC**) if a breach is likely to result in serious harm, in accordance with the Notifiable Data Breaches (**NDB**) scheme.

Training and Governance

- Provide regular training to Staff and contractors on their privacy obligations.
- Embed privacy and data protection into corporate governance and operational practices.

Roles and responsibilities

Board and Executives: Oversight of privacy governance and compliance frameworks.

Chief Executive Officer (CEO) and Managers: Ensuring implementation and operational compliance

All Personnel: Adherence to this policy and related procedures.

Privacy Officer: Monitoring compliance, responding to access requests, complaints, and managing breaches.

Complaints and inquiries

Individuals can raise concerns about privacy breaches or request access/correction of their information by contacting the Privacy Officer (General Counsel).

Complaints will be managed in accordance with the ARRC Group's Complaints Policy, Complaints process and privacy legislation.

Interpretation

In the event of any ambiguity or inconsistency between this Policy and applicable legislation or regulations, the provisions of the relevant legislation and regulations shall prevail.

Related Documents

Complaints Policy
Complaints process

Compliance

The ARRC Group operates under the following laws and obligations:

Information Privacy Act 2009 (Qld)
Privacy Act 1988 (Cth)
Right to Information Act 2009 (Qld)
Corporations Act 2001 (Cth)
Public Health Act 2005 (Qld)
Criminal Code Act 1899 (Qld)

Review and Amendments

This Policy will be reviewed biennially or earlier where required by legislative changes, operational feedback, or incident investigations.

Approved by:

ARRC Board of Directors