

Privacy Policy

Purpose

Protecting the privacy and confidentiality of all employees, candidates and clients is an integral part of Enco's Operating Values and Integrated Management System. Enco is committed to maintaining the highest standards of confidentiality and ensuring that all personal, sensitive and proprietary information is handled responsibly and lawfully.

Our aim is to foster a culture of trust, discretion and professionalism, and to manage information in a way that supports ethical business conduct and regulatory compliance.

Legal Compliance

Enco is committed to maintaining a compliant Privacy Management System, which is reviewed regularly to ensure adherence to the following legislation:

- **Privacy Act 1988 (Cth)**
- **Equal Opportunity Act 1984 (WA)**
- **Fair Work Act 2009 (Cth)** (including associated rules and regulations)

These laws guide the way personal and sensitive information is collected, stored, accessed, disclosed and disposed of.

Policy Objectives

The objectives of this policy are to:

- Promote procedural fairness across all interactions and processes
- Uphold reasonable management action in dealing with confidential information
- Commit to employee health, safety and wellbeing, especially in relation to privacy-related matters
- Educate employees through training and information on confidentiality obligations
- Clarify what constitutes private and confidential information
- Ensure appropriate documentation processes for candidate and client care
- Provide staff with clear guidance, instruction and supervision on how to handle sensitive information professionally
- Foster a workplace culture that values confidentiality and discretion, enabling strong and respectful relationships with stakeholders.

Responsibilities

Management Responsibilities

All levels of management are responsible for:

- Developing, implementing and maintaining Enco's Privacy Management System
- Preventing the unauthorised disclosure of personal or confidential information
- Ensuring all employees are informed, trained and supervised in matters relating to privacy
- Leading by example in maintaining confidentiality in all business dealings
- Reviewing systems and controls to safeguard sensitive data.

Employee Responsibilities

All employees and contractors are expected to:

- Understand and comply with Enco's privacy obligations
- Take reasonable steps to protect the confidentiality of colleagues, candidates and clients
- Ensure that personal or sensitive information is not disclosed without authorisation
- Report any suspected privacy breaches or risks through the appropriate channels
- Treat all documentation and information with the highest standard of care and discretion.

Scope of Confidential Information

Private and confidential information may include (but is not limited to):

- Employee and candidate personal details, including medical and financial information
- Client business operations, data and intellectual property
- Internal company records, reports and performance data
- Information gathered during recruitment, assessments and employment
- Details discussed during HR processes, investigations or grievance procedures.

Data Handling and Security

Enco implements data protection measures to ensure information is handled securely, including:

- Secure access controls for systems and documents
- Controlled sharing of information on a need-to-know basis
- Appropriate digital and physical data storage and disposal procedures
- Breach reporting protocols in line with Notifiable Data Breach requirements (Privacy Act 1988).

Alignment with Enco Group – Values Statement

This policy is guided by the **Enco Group – Values Statement**, which defines the organisational principles that underpin our decisions, actions and conduct. All employees and contractors must read this policy alongside the Values Statement and uphold the behaviours that reflect these values in their daily work.

Policy Review and Communication

This policy will be reviewed periodically in line with Enco's Integrated Management System review process to ensure ongoing relevance, effectiveness and compliance.

It is communicated to all employees, contractors and visitors, and is readily available through Enco's internal platforms. The Code of Conduct is also embedded in onboarding, training and performance management systems to ensure consistent application across the business.