

## Overview

The Toll Way is the underpinning foundation of our core beliefs and values which guides our decisions and actions.

Toll is committed to protecting the privacy of anyone who applies for employment or other engagement with Toll (**Candidates**).

## Scope

We set out below information regarding Toll's collection, analysis, disclosure and other use of Candidates' personal information. If you accept employment with or are otherwise engaged by Toll we will, of course, collect more information about you and make other uses of your information – this will be explained to you as part of the on-boarding process.

## Principles

### 1. Information Collected From Candidates

#### Where do you collect information from?

- 1.1 Toll collects information about Candidates in the course of the recruitment process. Some of this information is collected directly from you (for example, in forms that you are asked to complete, or in interviews or through the completion of tests). Other information is generated automatically when you use or otherwise interact with Toll's systems (for example, when you log in to our website); or provided to us by third parties (for example, recruitment agencies, referees and educational institutions), including by third party service providers or publicly available sources for anti-money laundering, background checking and similar purposes, and to protect our business and comply with our legal and regulatory obligations. Toll will also generate its own assessment information about you during the recruitment process.

#### What types of information do you collect?

- 1.2 The information we collect about Candidates includes:
- 1.2.1 basic information about yourself, such as name, contact details and gender, image and information provided to verify your identity;
  - 1.2.2 information regarding your employment and educational history, any role or roles for which you are applying or being considered and your relevant personal interests, attributes and career aspirations and plans, and results of background checks;
  - 1.2.3 other information about yourself that you provide in a CV or similar document; and
  - 1.2.4 information regarding racial or ethnic origin, age, gender, health and disability, which we collect for equality of opportunity monitoring purposes, only with your explicit consent.
- 1.3 Generally you should assume that, if we ask you for information, we need it for our recruitment purposes. In some cases we may not be able to consider your application if you cannot provide information that we request. There may be occasions where we need information to comply with a legal obligation, or conversely where provision of information is entirely optional and would not affect your application – we will let you know if this is the case.

## 2. **Our use of your information**

### **How do you use the information you collect about me?**

- 2.1 We use Candidate information to manage the recruitment process and assess you for employment or other engagement, to monitor and improve our recruitment processes and for related purposes (including equality of opportunity monitoring), compliance with law and regulation, for internal operations, including research, statistical and survey purposes, ensuring the security of our business and purposes relating to legal claims made by or against us.
- 2.2 We will take appropriate measures to ensure that we keep your personal information secure, accurate and up to date.

### **What happens if my application is unsuccessful?**

- 2.3 If you are unsuccessful in your application, we may also retain your Candidate information and use it to assess your suitability for future positions and roles within the organisation, as further described in paragraph 5.1 below

### **Will you ask for my consent?**

- 2.4 We are entitled to use, disclose and otherwise process Candidates' (and former Candidates') information as described in this notice, on the basis that we have a legitimate interest in carrying out the processing set out in paragraph 2.1. We do not rely on Candidates' consent to collect, use or otherwise process their personal information other than in exceptional circumstances where our processing is genuinely optional (for example, collection of certain information for equality of opportunity monitoring as discussed in paragraph 1.2.4 above) – in those circumstances we will ask for your consent on a case-by-case basis. Some processing may also be necessary so that we can perform a contract with you or because it is required by law.

## 3. **Disclosure of Candidate information**

### **Who do you disclose my information to?**

- 3.1 Toll may disclose Candidate information, where reasonably necessary for the various purposes set out in paragraph 2, to:
- 3.1.1 recruitment agencies working with us in relation to your potential recruitment;
  - 3.1.2 other service providers processing Candidate information on our behalf in the course of supporting our business and operations;
  - 3.1.3 a person who takes over our business and assets, or relevant parts of them;
  - 3.1.4 other members of the Toll group;
  - 3.1.5 third parties to whom Toll is required to disclose information by law or regulatory requirement (including litigation counterparties); and
  - 3.1.6 competent regulatory and prosecuting authorities.
- 3.2 If you give us names of potential referees, we will disclose the fact that you are applying to work with us to them when we ask them for references.

#### 4. **International data transfers**

##### **Will you transfer my information overseas?**

The disclosures of Candidate information described in paragraph 3 may involve international transfers, including transfers to countries outside the European Economic Area which do not have data protection laws as strict as those in the UK. In these cases, where we transfer Candidate information to other members of the Toll group or third party service providers acting on our behalf, we do so on the basis of agreements put in place to protect your information in a form approved for this purpose by the European Commission.

#### 5. **Retention and deletion**

##### **How long will you retain my information for?**

- 5.1 We will generally retain information about you throughout the recruitment process. We will usually delete this information after the recruitment process ends. Some information will be retained after the process ends, either because you are employed or otherwise engaged by us or, if your application is withdrawn or unsuccessful, because we retain information in case you apply to work for us again (or a suitable position within the Toll group becomes available) or a recruitment-related dispute arises between us.
- 5.2 As a general principle, we do not retain Candidate information (except in anonymised / statistical form) for longer than we need it, given the purposes for which it is held.

#### 6. **Rights and questions**

##### **What rights do I have in respect of the information you hold about me?**

- 6.1 With limited exceptions, Candidates have legal rights to be given copies of the personal information that we hold about them and to require inaccurate information to be corrected. In some circumstances you can also require us to delete (or restrict or stop making active use of) your personal information. In certain limited circumstances, to receive some of the personal information that you have provided to us in a structured, commonly used and machine-readable format and to transmit that information to another service provider.

##### **Who do I contact about this notice?**

- 6.2 If you wish to exercise any of these rights, would like to see copies of any of the agreements referred to in paragraph 4 or have other questions about our Candidate information processing or related policies, please contact the Data Compliance Lead:

Data Compliance Lead  
Toll Holdings Limited  
Level 7, 380 St Kilda Road  
Melbourne VIC 3004, Australia  
Email: [privacy@tollgroup.com](mailto:privacy@tollgroup.com)

##### **Can I make complaints to the data protection authority?**

- 6.3 You also have the right, at any time, to lodge a complaint about our processing of your personal information with the relevant data protection authority in the jurisdiction where you are located.