

1. Our obligations

SNS Group Holdings Pty Ltd is committed to safeguarding the privacy of personal information of every individual interacting with the company – this includes client, vendor, employee, parent, child, elderly person, job applicant, and any relevant internal and external stakeholders.

SNS Group Holdings, our employees, professionals, and other members are bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) and other privacy laws and by a strict code of conduct that governs how private sector health service providers collect, use, disclose, and store your personal and sensitive information.

This policy details what personal information we will hold about you at any of our facilities, how you can access this information and the purposes for which your personal information is used and disclosed.

2. Information we collect

We collect and process different types of personal information depending on how you interact with us. We only collect information that is reasonably necessary for the delivery of our services or to help manage any business you may have with us.

We take all reasonable steps to ensure information we collect about you is accurate, complete and up to date. You can request incorrect information be amended.

We take appropriate measures to ensure information we collect about you is stored securely. We ensure to retain any record for certain periods of time depending on the type of record and facility.

Information we collect may include:

- Identification data – such as your name, gender, job title, photograph and date of birth.
- Contact details – such as your home and business address, email address and telephone number.
- Recruitment-related information – such as your name, email address, location, telephone number, qualifications, employment history, interests, types of roles you are interested in, your work application form and resume or CV. If you progress through the interview process, we may also collect interview notes, references, results of any psychometric tests and background checks (including criminal records checks), your work visa and other information to verify your identity and right to work.

Digital information – this includes information required to provide access to SNS portals (such as login information, IP addresses), and records of your use of this website or portal.

- Usage information – information we collect when you use our websites or apps, such as server log information (your IP address, browser type, operating system, browser language, time zone, access times and any referring addresses) and location information.
- Other information – this includes information about access and attendance to SNS premises and physical assets (such as security records about times of entry and exit, and information collected through CCTV), details about your use of our assets, communications with you (including complaints or concerns raised by you or any feedback or survey responses that you provide to us) and other information you voluntarily provide to SNS.
- Sensitive personal information – Some types of personal information are considered to be more private than others (which, depending on jurisdiction, includes information about someone's racial or ethnic origin, political opinions, religious beliefs or affiliations, health or medical conditions, genetic information, biometric information, sexual orientation, criminal record, trade-union membership and political association membership). This type of information is called "sensitive personal information".

Sometimes we may collect sensitive personal information about you (such as health or medical information, criminal history checks, or your racial or ethnic origin), but we will only do this as described in the next section: Why this information is collected.

3. Why this information is collected

We collect personal information for us to conduct our business and provide you with our services, which include job recruitment, managing contractual agreements, keeping an eye on who has access to our websites and apps, managing safety and security risks, and meeting regulatory requirements. We also collect sensitive personal information where you have provided your consent or where it is necessary to comply with legal obligations.

The purpose of collecting your personal information will depend on the type of business or service you are engaging in or about to engage with us. However, the following are the primary purposes for which we collect personal information:

- Managing our relationship with you – this includes providing you with information or services, improving our services and communicating with you;
- Business-related purposes – this includes negotiating, managing, and fulfilling our contracts with customers, suppliers and third parties (including e-commerce transactions); managing business relationships; conducting clearance procedures; managing accounts and records; supporting corporate social responsibility activities; resource planning and workforce management; activities and operations; internal investigations; and financial administration;
- Marketing and public relation purposes – this includes analysing the characteristics of visitors to our website; to prepare analytics and profiling for business intelligence purposes; to personalise your experience on our website; and managing our newsletters and communications;
- Recruitment-related purposes – this includes considering you for career opportunities (including internship positions) with SNS and inviting you to participate in recruitment activities and events;

- Managing safety and security risks – this includes managing and monitoring access and use of our premises and sites, safety and security at our sites (including through the use of CCTV), and our IT environment (including monitoring electronic communications) and the health of those on our sites;
- Website administration and internal operations – this includes troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- Legal obligations – this includes meeting obligations imposed under law; responding to lawful requests from governments and public authorities; and responding to potential or actual litigation.

4. How this information is collected

We will ordinarily collect your personal information directly from you. This may take place when our designated staff is directly administering your concern personally, or you may be asked to fill up our online registration form through our portal. It may also occur via our facilities admission process, in person or over the telephone.

Sometimes we may also need to collect information from third parties (e.g. a relative, power of attorney, employer or other health services provider), if it is unreasonable or impracticable to collect it from you (e.g. in the case of an emergency).

To facilitate the continuation of our service to meet your needs and manage any business with you, personal information is only ever released if required by law and agreed to with your consent. If you do not want your personal information disclosed and used when needed to provide services and meet compliance requirements, please let us know.

5. Use and disclosure of personal information

We may use and disclose your information for purposes directly related to the services you availed of or any business you entered into. We may share your personal information within our company as well as with third parties involved in running our business and with your authorised representatives.

Disclosures within SNS

We may share your personal information (which may sometimes include sensitive personal information) within our company who require the information for the purposes stated in this policy. Sharing of this information within our company is governed by a data transfer agreement that we have in place in this policy, which is bound by Australian Privacy Laws.

Disclosures outside SNS

We may also need to share your personal information (which may sometimes include sensitive personal information) with:

- people you have authorised to interact with us on your behalf (such as a relative, power of attorney, or another authorised representative);

- third parties who provide services we use to run our business (such as external service providers, information technology and other shared services functions, that provide IT services or that provide security for SNS sites or systems);
- prospective clients of all or part of our business; and
- government authorities or other persons where obliged to do so by an applicable law.

If we need to disclose personal information to third parties in a different country to where the information was collected, we will take appropriate measures to ensure that there is a lawful basis for the disclosure and that the disclosure complies with all applicable laws. This may include entering into a legally binding contract with the recipient under which they are obliged to handle your information in accordance with applicable laws.

We cannot use your information for direct marketing purposes unless you provide authorisation. Our policy ensures our staff treat your information confidentially and discreetly.

6. Storing personal information

The security of information is important to SNS. Our staff are responsible for maintaining the security of personal information from unauthorised access to misuse, loss and damage. We store personal information in a variety of ways, including paper and electronic formats.

We take strict precautions to ensure that your personal information remains secure and protected against unauthorised use. Your personal information is only kept by us for the purpose of fulfilling the purposes stated in this policy.

Information security

SNS has established policies, procedures and acquired technologies to maintain the protection of your personal information from the time of collection until the time of retention and disposal.

We also take measures to ensure that all our employees are aware of and are properly trained through applicable information security policies and procedures that are designed to keep your personal information protected and secure. We will investigate and take appropriate action if there will be any failure to comply with these policies and procedures.

Storing personal information

We generally store the personal information that we collect in an electronic document repository. SNS has established its electronic document management system, which is generally managed and hosted in a secure dedicated data centre in Perth, Australia.

We may also use third parties to store and process your personal information. However, we will only do this if the party agrees to comply with our procedures and policies or if they put in place equivalent security measures.

Information retention

SNS may retain personal information if it is reasonably needed for the purposes described in this policy or as otherwise mandated by law.

Job applicants

If you are applying for employment with SNS, and your application is unsuccessful, we may keep your personal information for 12 months for the purposes of considering you for other job opportunities within SNS. We have no obligation to retain your personal information for this purpose and may decide to delete your personal information at any time after an unsuccessful application.

You may request that we delete your personal information from our database at any time by emailing us at hello@sns.com. We will not deactivate your account on our job vacancy website, unless you request that we do so. You can apply for other roles in SNS at any time, even after an unsuccessful application.

If your account is inactive for 12 months, we may contact you to check whether you want it to remain active. If we do not hear from you, or if you ask us to do so, we will deactivate your account. Following deactivation, all your account information will be removed from our systems in accordance with our standard information retention and disposal policies.

7. Your rights and preferences

SNS acknowledges that you have rights concerning your personal information collected by us. We respond to all requests we receive from individuals wishing to exercise their rights in relation to any information we hold in accordance with applicable data protection laws.

If you wish to access, correct or update your personal information, you may contact us by sending email to: hello@sns.group or fill up our online form available on our website through "Contact us" section.

We value the accuracy and timeliness of the information we have on our records about you, so notify us promptly if you become aware of any inaccuracies or other changes that need to be made.

If you are concerned about how we are dealing with your personal information, then you may have the right to complain to an applicable data protection authority. You can contact the Commonwealth Privacy Commissioner (Office of the Australian Information Commissioner) through their website:

<https://www.oaic.gov.au/contact-us>

Before raising a complaint with a data protection authority, we recommend that you first raise the issue with us so we can address your concerns immediately. We will make a record of your complaint and will deal with it as quickly as we can while keeping you informed of progress. Even if we are not able to address your concern, we will be able to provide further information about how you can contact a relevant data protection authority.

8. Policy updates

SNS will update this policy when appropriate to reflect modifications to applicable laws or updates to our privacy compliance policy. This policy will always be available on the SNS website in its most recent revision.

9. Contacting us

If you have inquiries regarding the privacy of your information or if you have a complaint, do not hesitate to contact us by sending your email to: hello@sns.group or fill up our online form available on our website through "Contact us" section.

10. Further information

If you would like more information about privacy in general, please refer to the [Office of the Australian Information Commissioner's](#) website.

This policy is endorsed by SNS Group Holdings' Senior Management and its effectiveness reviewed annually.

A blue ink signature of Karl Depiazzi.

Karl Depiazzi
Co-CEO
17 August 2026

A blue ink signature of Andrew Fenech.

Andrew Fenech
Co-CEO
17 August 2026

REVISION HISTORY				
Rev #	Date	Issue Details	Prepared by	Reviewed by
1.0	29/07/2024	Creation, review and approval	Josephine Calderon	Andrew Fenech
1.1	24/07/2025	Reviewed; No changes have been made	Josephine Calderon	Catherine Fernandez
2.0	17/08/2026	Updated to the new SNS policy template and added the revision history table	Josephine Calderon	Catherine Fernandez