

PRIVACY POLICY – Multiplex Construction Canada Limited

Introduction and Scope

Multiplex Construction Canada Limited (“**Multiplex**”) is committed to protecting the privacy and confidentiality of personal information in our custody or control in accordance with Canadian privacy laws, including the federal Personal Information Protection and Electronic Documents Act (PIPEDA) and any applicable provincial private-sector privacy laws. This Privacy Policy describes how we collect, use, disclose, and safeguard personal information, and the rights and choices you have regarding your information. It applies to our operations in Canada and to personal information of individuals who interact with us, including visitors to our websites, clients and other business partners (such as subcontractors and suppliers), job applicants, project site visitors, and members of the public who engage with Multiplex.

Information We Collect

We collect personal information that you provide to us or that is generated through your interactions with Multiplex. The types of personal information we may collect include:

- **Contact and Identity Information:** For example, your name, address, telephone number, email address, and other contact details, as well as business contact information (such as your job title, company name, and business address).
- **Business and Transaction Information:** Details related to the products and services you or your company request or receive from us (e.g. project contracts or service agreements), billing and payment information, and communications you exchange with us (such as inquiries, feedback, or complaint details).
- **Job Applicant Information:** If you apply for a job with Multiplex, we collect the personal information you provide in your application. This may include your CV, contact details, employment and education history, qualifications, and references. We use this information to evaluate and communicate with candidates as part of our recruitment process.
- **Site Access and Security Information:** When you visit our offices or project sites, you may be asked to provide identifying details (such as your name, organization, and the purpose of your visit). We also use **camera surveillance systems** (e.g. CCTV, security cameras, or similar monitoring devices) at certain project sites and facilities to maintain a safe and secure environment for our employees, contractors, clients, suppliers, visitors, and members of the public.
- **Online Usage Data:** When you visit our websites or interact with our online services, we may collect technical information such as your IP address, browser type, device identifier, pages visited, and cookies or similar tracking data. This information helps us administer and improve our websites, understand user preferences, and ensure our online services function properly.

How We Use Personal Information

We use the personal information we collect to conduct and improve our business and to serve you. The specific purposes for which Multiplex may use your information include:

- **Providing Products and Services:** To respond to your inquiries, establish and maintain business relationships, and fulfill our obligations in contracts or projects. This also includes processing transactions such as payments, invoices, and accounts with clients, subcontractors, and suppliers.
- **Communication and Customer Service:** To communicate with you about your requests, answer your questions, provide support, and inform you of updates or changes related to our services or this Policy.
- **Business Operations and Improvement:** To conduct internal operations and administration, such as internal research, analytics, audits, and service improvement initiatives. We may also use personal information in surveys, contests, or other offerings you choose to participate in, and for other legitimate business purposes such as planning, record-keeping, and strategy development.
- **Recruitment:** To process job applications and manage hiring processes.

- **Legal and Regulatory Compliance:** To comply with applicable laws and regulations, and to fulfill our legal obligations.
- **Safety and Security:** To protect the security of our personnel, visitors, property, and the public.
- **Marketing and Information Sharing (with consent):** Where you have subscribed or otherwise given your consent, to send you marketing communications about our projects, services, news, or events.

Consent

By interacting with Multiplex and providing personal information, you are usually consenting to our collection, use, and disclosure of that information as outlined in this Policy. We will seek your knowledge and consent for the collection, use, and sharing of your personal information, except where consent is not required or is implied by law (for example, in emergencies, for investigations or fraud prevention, or other circumstances permitted by law). In some cases, your consent can be inferred from your actions, for example, if you provide personal information to apply for a job or request information about our services, we will assume you consent to our reasonable use of that information for those purposes.

You have control over your personal information. In particular, you may withdraw your consent to certain uses of your information at any time, subject to legal or contractual restrictions. If you refuse or withdraw consent, we will honor that choice except as otherwise required by law and will (as appropriate) no longer collect, use, or share your information for that purpose. Note that if you withdraw consent for a purpose that is integral to providing a service or fulfilling a contract (such as consent to use your contact information and project details in performing a construction contract), it may limit our ability to continue to serve you.

Disclosure of Personal Information

Multiplex does not sell your personal information to third parties for their own marketing or any other unrelated purposes. We may disclose (share) your personal information to third parties only for purposes that are reasonable and related to our legitimate business operations or as required by law, as follows:

- **Service Providers:** We may share personal information with third-party service providers and partners who perform services on our behalf or assist us in delivering our services. This includes, for example, companies providing cloud data storage or IT services, auditors, professional advisors, payroll and benefits providers, subcontractors or consultants working with us on projects, and other business services. These third parties are given only the information necessary to perform their services and are contractually required to safeguard personal information and use it only for the purposes we specify.
- **Affiliates:** We may share information with our affiliated companies or parent organization (e.g., other entities within the Multiplex corporate group or our parent company) if needed for internal administrative purposes, business operations, or to provide you with services. Any such internal sharing is done on a need-to-know basis and according to this Policy.
- **Legal and Regulatory Compliance:** We may disclose personal information if requested by law enforcement or as required by applicable laws, regulations, legal processes, or governmental requests. We may also disclose information to protect our legal rights, enforce our contracts, collect debts owed to us, or protect the safety of our personnel, clients, and the public, as permissible by law.
- **Business Transactions:** If we engage in a corporate transaction such as a merger, acquisition, financing, or sale of all or part of our business or assets, personal information may be disclosed to participants (e.g. to prospective purchasers, investors, or other parties) as part of the transaction, in accordance with applicable privacy laws. In such cases, we will require the recipient to protect the information consistent with this Policy and applicable law.

When we transfer personal information to a third party (including service providers or business partners) for processing on our behalf, we remain accountable for protecting that information.

Safeguards and Security

We take the security of your personal information very seriously. Multiplex has implemented appropriate physical, organizational, and technological safeguards to protect personal information against risks such as loss or theft, unauthorized access, disclosure, copying or modification. These measures include secure IT systems, encryption and firewall protections, access controls to limit who can access personal data, and secure storage for physical records. We limit access to personal information to employees, contractors, and agents who need to know it to fulfill their job duties, and we ensure they are subject to confidentiality obligations and training on proper data handling. We regularly review our security practices and will periodically update and strengthen protections to address new threats or vulnerabilities. However, no security measures can

ever be 100% effective and there will always be some residual risk that our data, including your personal information, could be compromised despite our on-going efforts to protect it. In the event of a data breach or security incident, we have procedures in place to respond, mitigate harm, and notify affected individuals and authorities as required by law.

Use of Cookies

A cookie is a small piece of text that is placed on your computer or other device and maintained by your browser when you visit a website. Cookies allow information to be saved between visits to a website. We use cookies to administer and improve our websites, understand user preferences, and ensure our online services function properly. You can manage your cookie preferences through your browser. However, some of the cookies that we use are necessary for the operation of the websites and you may not be able to access or use the websites as intended without those cookies.

Children

We do not knowingly collect personal information from children under the age of 13. If a child under 13 has provided personal information to us, their parent or guardian may contact us as set out below.

Retention of Personal Information

We will retain personal information only for as long as necessary to fulfill the purposes for which it was collected, or as required or permitted by law. In general, once personal information is no longer needed for the identified purposes, we will securely destroy, delete, or anonymize the data.

Access and Correction of Personal Information

You have the right to request access to the personal information we hold about you, and to request corrections to any information that is inaccurate or incomplete. Upon written request and authentication of your identity, we will provide you with any personal information in our records about you, as required by law, and information about how it has been used or disclosed (subject to certain exceptions under the law). If you find any of your personal information is incorrect or out-of-date, you may request that we correct or update it, and we will make the necessary updates where appropriate. In some situations, we may not be able to provide certain information (for example, if it would reveal personal information about another individual, or if it is subject to legal privilege or security restrictions), but we will inform you of the reasons, subject to any legal limitations. We will respond to access requests or correction requests within the timeframes required by law and will advise you of any steps required to verify your identity.

If you have questions about how we handle personal information or if you believe we have not addressed your privacy-related request or concern satisfactorily, please contact us (see “Contact Information” below). We will investigate all privacy complaints and strive to resolve them. If you are not satisfied with the resolution, you have the right to contact the Office of the Privacy Commissioner of Canada (or your provincial privacy commissioner, if applicable) to file a complaint.

Cross-Border Data Transfers

Multiplex is a Canadian company, and we primarily store and process personal information on servers located in Canada or the United Kingdom. However, given the nature of our business and the services we use, your personal information may be transferred or accessible outside of Canada or the United Kingdom in certain circumstances. For example, we may use reputable third-party service providers (such as cloud computing, data hosting, or software providers) located in the other jurisdictions to store or process data on our behalf. Those providers and the data they process on our behalf will be subject to the laws of the jurisdictions in which they operate. Also, if you interact with our global organization (for instance, if a project involves our parent or affiliate companies in other countries), relevant personal information may be shared with those international affiliates. Regardless of location, we remain accountable for safeguarding your personal information, and we take appropriate measures to require that any such international transfers comply with Canadian privacy requirements.

Contact Information

If you have any questions, concerns, or requests regarding this Privacy Policy or our personal information practices, please contact us:

To: Privacy Officer, Multiplex Construction Canada Limited
Email: privacy.canada@multiplex.global
Mailing Address: 200 Wellington Street West, Suite 1600, Toronto, ON, Canada M5V 3C7