

REMONDIS Australia

Privacy Policy

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REMONDIS Australia Privacy Policy

REMONDIS Australia Pty Ltd ACN 002 429 781 and its related bodies corporate (as defined in the Corporations Act 2001) (collectively, **us**, **we** or **our**) maintain this policy to protect your (**you**, **your**) personal information (this **Privacy Policy**). This Privacy Policy has been developed in accordance with the *Privacy Act 1988 (Cth)* (**Privacy Act**).

This Privacy Policy applies to the collection, storage, use and disclosure by us of your personal information. This Privacy Policy applies to all personal information provided to us by any means and demonstrates how we will comply with the Australian Privacy Principles under the Privacy Act. This Privacy Policy also includes our policy on credit reporting (as detailed in Section 3) that sets out our commitment to protect the personal information of our customers that we may service and assess their credit worthiness.

If you have any further questions or if you wish to receive more information on our personal information practices and Privacy Policy, please contact our Privacy Officer at privacy@remondis.com.au or by writing to the Privacy Officer, REMONDIS Australia Pty Ltd, Level 4, 163 O'Riordan Street, Mascot NSW 2020.

1.0 COLLECTING PERSONAL INFORMATION

In this Privacy Policy, **personal information** means any information or opinion about an identified individual or an individual who is reasonably identifiable, whether or not it is true or in writing. The personal information that we collect in connection with an application for a service arrangement with us, or whether by providing credit in connection with any service, is referred to in this Privacy Policy as **credit information**.

The types of personal information we collect about you depends on the nature of your interactions with us. We may collect and hold the following types of personal information for the purposes set out in section 3:

- identification and contact information including your name, mailing and/or delivery address, email address and telephone number;
- information about the products and services that you purchase from us;
- your preferences or requirements that are relevant to the products and services that we may provide to you;
- your financial information including credit card and other account details (in order to manage the risk of credit card fraud, we engage regulated third party providers to facilitate any credit card payments in accordance with prevailing industry standards (also refer to section 9 regarding storage and security of these details));
- if you access any of our websites, geolocation information, IP address and browsing information;
- if you apply for a service arrangement from us:
 - your credit information, including information regarding your bank account details, insolvency related court proceedings relating to you, credit scores, credit evaluations and other information related to your creditworthiness;
 - provided that we obtain, where relevant, any consent required by law, credit reports, including reports obtained from credit reporting bodies and reports relating to credit payment and default information, including credit accounts held, and your repayment history, with other credit providers;
 - information about any credit account that you hold with us, including how long that account has been held, credit limits and payment and default information;
- if you apply for employment with us, details of your employment history, and other information provided as part of our recruitment process; and
- any other personal information that may be required in order to facilitate your dealings with us.

We will generally collect personal information from you directly:

- when you communicate or interact with us in any way in relation to any of our products or services, including when you apply for a service arrangement from us (whether on credit or otherwise);
- (and indirectly) when you use any of our websites or in any social media interaction (see also **Section 2**);
- when you participate in our surveys or promotions or ask to receive our newsletters or other information from us;
- when you visit our premises;

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- if you apply for employment with us, through our recruitment process; and
 - if you (or an entity you are engaged by) provides products or services to us, when we interact with you in relation to that provision.

We may also collect your personal information from third parties where it is unreasonable or impractical to collect it directly from you, such as from:

- your representatives or employer;
- credit reporting bodies and other credit providers (if you apply for a service arrangement from us);
- your nominated referees (if you apply for employment with us); or
- publicly available sources of information.

Generally, we will not collect any sensitive information from you, such as information revealing your race, ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships or details of health or disability. Exceptions to this include where you have given express consent to us to do so and the information is reasonably necessary for any of the purposes set out in **Section 3**.

You have the option of dealing with us on an anonymous basis or by using a pseudonym. However, if we are unable to collect personal information we reasonably require, we may not be able to do business with you or the organisation with which you are connected.

2.0 COOKIES

When you visit one of our websites the server may attach a "cookie" to your device's memory. Cookies assist us to store information on how visitors to any of our websites use it and the pages that may be of most interest. This information may be used to provide users of your device with information that we think may interest the users of your device. If you choose, you should be able to configure your device so that it disables "cookies" or does not accept them. Disabling cookies may adversely impact your experience in using our websites.

3.0 USE OF PERSONAL INFORMATION

We will use the personal information that we collect about you for purposes relating to providing our products and services to you and for otherwise interacting with you in carrying on our business. Those purposes include:

- to provide our products and services to you;
- to communicate with you;
- to help us manage, develop and enhance our products and services, including our websites;
- to provide our newsletters to you and to keep you informed of our products and services, relevant upcoming events and our activities (including as set out in section 5);
- to action requests and consider your feedback and complaints;
- to conduct market research;
- to comply with our legal obligations and enforce our rights;
- to investigate incidents (whether they occur on or off our premises);
- for security and risk management purposes;
- if you apply for a service arrangement with us, to assess that application and to provide credit (if any), if approved and to notify credit reporting bodies or other credit providers of a default by you or of any other information that we are permitted by law to disclose to such persons;
- if you apply for employment with us, to consider your suitability for that employment; and
- if you (or an entity you are engaged by) provides products or services to us, to engage with you in relation to that provision.

We will only collect, store, use or disclose personal information, including your credit information, as set out in this Privacy Policy and in compliance with our obligations under the Privacy Act and the Privacy (Credit Reporting) Code 2014.

4.0 DISCLOSURE OF PERSONAL INFORMATION

We will not disclose your personal information to any third party other than as set out in this Privacy Policy. We may disclose your personal information for the purposes described in **Section 3** of this Privacy Policy to our related bodies corporate and other organisations, such as:

- our own product and service providers;
- marketing companies and consultants;
- credit reporting bodies and other credit providers (if you apply for a service arrangement from us); and
- law enforcement or regulatory authorities or as otherwise required or authorised by law.

Although our websites may link directly to websites operated by third parties (**Linked Sites**), you acknowledge that Linked Sites are not operated by us. We encourage you to always read the applicable privacy policy of any Linked Site on accessing the Linked Site. We are not responsible for the content or practices of the Linked Sites nor their privacy policies.

5.0 DIRECT MARKETING

We may use personal information about you for the purpose of sending you information about new developments, products, services and special offers by post, telephone or any form of electronic communication. You authorise us to use any email address or other contact information you provide to us at any time for this purpose.

You can, at any time, opt out of receiving marketing material by contacting us (contact details are set out in section 12). You agree and acknowledge that even if you opt out of receiving marketing material, we will still send you essential information that we are legally required to send you relating to the products and services we provide.

6.0 ACCURACY OF YOUR INFORMATION

We take all reasonable steps to ensure that your personal information held by us is accurate, up-to-date, complete and relevant. If you believe that any of your personal information is not accurate, up-to-date, complete or relevant, please contact us (see **Section 12**) and we will take all reasonable steps to correct it within a reasonable time.

7.0 DISCLOSURE OF INFORMATION OVERSEAS

We may disclose your personal information to third parties located outside Australia, including in Germany and the United States, to fulfil any of the purposes set out in this Privacy Policy, for example:

- to perform certain business functions (eg payment and invoicing purposes);
- to enable the use of third party software service providers, such as our online chat system; or
- to our related entities.

8.0 YOUR CONSENT

By seeking products or services from us, by your use of any of our websites or by otherwise interacting with us, you agree to the terms of this Privacy Policy.

9.0 STORAGE AND SECURITY

We will use all reasonable endeavours to hold your personal information in a secure environment, however, this security cannot be guaranteed. Our security measures are designed to ensure your personal information is not subject to unauthorised access, modification or disclosure or to interference, loss or misuse.

If we no longer need your personal information, unless we are required under Australian law or a court or tribunal order to retain it, we will take reasonable steps to destroy or de-identify your personal information, in accordance with our document and information retention policy.

We have implemented internal controls, including physical security (eg; locks) and computer and network security, (eg; firewalls and passwords) to protect personal information (including credit card and other account details) from loss, misuse and interference and

from unauthorised access, modification or disclosure. In addition, access to your personal information is limited to those who specifically need it to carry out their responsibilities such as our customer service and credit teams.

10.0 CREDIT REPORTING BODIES

If we provide any of your personal information, including any payment default information, to any credit reporting body it may include that information in reports provided to other credit providers to assist such other credit providers to assess your creditworthiness. Some of the credit information that we provide about you to a credit reporting body or bodies may reflect adversely on your creditworthiness and this may negatively impact your ability to obtain credit from other credit providers.

We use the credit reporting services provided by CreditorWatch Pty Limited ACN (144 644 244) (**CRB**). CRB may use the credit reporting information (as defined in the Privacy Act) it holds about you for the purposes of pre-screening for direct marketing by certain third parties. You have the right to request CRB not to use that credit reporting information for pre-screening purposes. You also have the right to request CRB not to use or disclose that credit reporting information if you believe on reasonable grounds that you have been or are likely to be a victim of fraud.

Please refer to CRB's credit reporting policy for details on its management of credit reporting information. A copy of that policy can be obtained at creditorwatch.com.au/privacy/ or by contacting CRB as follows:

CreditorWatch Pty Limited
GPO Box 4029, Sydney, NSW, 2001
Email: privacy@creditorwatch.com.au
Telephone: 1800 738 524

11.0 VARIATION AND CONSENT TO VARIATION

We may vary the terms of this Privacy Policy at any time. This Privacy Policy will always be available on our websites and you should check this Privacy Policy regularly so that you are aware of any variations made to this Privacy Policy. You will be deemed to have consented to such variations by continuing to seek products or services from us, your continued use of any of our websites or by otherwise interacting with us following such changes being made.

12.0 ACCESS TO INFORMATION WE HOLD ABOUT YOU

If you request access to the personal information we hold about you, we will respond to your request within a reasonable period of time and will give access to the information in the manner you request, subject to any exemptions allowed under the Privacy Act. You may request this information by contacting:

CONFIDENTIAL, The Privacy Officer,
REMONDIS Australia Pty Ltd
Level 4, 163 O'Riordan Street, Mascot NSW 2020
Email: privacy@remondis.com.au

We may charge a reasonable fee for providing that information.

13.0 COMPLAINTS ABOUT YOUR PRIVACY

If you wish to make a complaint about our personal information handling practices, please contact our Privacy Officer using the contact details provided in **Section 12**. Our Privacy Officer will acknowledge receipt of your complaint and after we have completed our investigation, contact you (usually in writing) to advise the outcome within a reasonable timeframe. If you consider that we have been unable to satisfactorily resolve your concerns about our handling of your personal information, you can contact the Office of the Australian Information Commissioner in the manner specified at www.oaic.gov.au.