

G3-01 Privacy Policy

Introduction

This Privacy Policy has been published to provide a clear and concise outline of how and when personal information is collected, disclosed, used, stored and otherwise handled by JR Richards & Sons and its related entities (**JRR**). The Policy relates to personal information collected by any means or technology.

JRR treats the handling of your personal information very seriously. To that end, JRR has systems and procedures in place to protect your privacy regarding handling your personal information. JRR's objective is to handle information responsibly and provide you with some control over the way information about you is dealt with.

JRR abides by applicable privacy principles, including those under the *Privacy Act 1988* (Cth). Those principles relate to collecting, disclosing, using, and storing personal information. Certain exemptions apply under those laws, including employee records. JRR may rely on those exemptions despite this Policy. Further information about privacy laws is available from the regulator (Office of the Australian Information Commissioner), whose details are below.

Collection of personal information

- a) Personal information is information or opinion from which an individual's identity may be reasonably ascertained. The nature of personal information collected by JRR generally includes an individual's name and contact details (including address, phone, fax and e-mail).
- b) JRR also collects other types of personal information from time to time (e.g. credit information and driver's licence details) and will inform you upon collecting such information for the purpose it is being collected. (See the "Credit reporting" section below for further details about JRR's handling of that information.)
- c) JRR personnel must undergo a medical examination and drug and alcohol screening before and during their employment with JRR.
- d) JRR does not collect personal information unless it is necessary for JRR to perform one or more of its functions and activities. Occasionally, some of this personal information may be sensitive, and JRR will only collect it with your consent or when required or authorised by law.
- e) JRR will take reasonable steps to destroy personal information when it is no longer required for such functions and activities.

G3-01 Privacy Policy

- f) JRR will generally collect personal information from you directly where reasonable and practical to do so. For example, JRR may collect personal information via telephone or letter or when you provide a resume or enter an agreement.
- g) There may be other occasions when JRR may source personal information from another JRR company or an external third party, including public sources and the parties described below under 'Use and disclosure of Personal Information.
- h) For security, training, dispute resolution and quality purposes, JRR may monitor and record your communications with JRR (including email and telephone) and operate video and audio surveillance devices on JRR's premises.

Use and disclosure of personal information

- a) Personal information provided to JRR may be shared with related companies associated with JRR.
- b) JRR may use and disclose your personal information for the purpose for which the personal data was initially collected.
- c) JRR may also use and disclose that personal information for a purpose related to the initial purpose of collection if that other purpose would be within your reasonable expectations.
- d) JRR uses and discloses personal information for a range of purposes, including internal auditing and administration, staff management, payroll, superannuation, health and safety, security, insurance (including SafeWork), providing and improving our services, verifying identity, conducting market and workplace research, managing complaints and claims, managing and investigating misconduct, protecting our lawful interests and the rights of third parties, adding your name to a contact list or helping us to identify business activities which may be of benefit or interest to you.
- e) JRR may also use or disclose your personal information with your express or implied consent or where the use or disclosure is:
 - 1) required to investigate an unlawful activity;
 - 2) required by an enforcement body for investigative activities;
 - 3) necessary to prevent a serious imminent threat to a person's life, health or safety, or to public health or safety; or
 - 4) otherwise required or authorised by law.

G3-01 Privacy Policy

- f) JRR may only be able to provide its services and perform its functions with your personal information. For example, JRR may not be able to contact you or make payments to you. As with most business organisations, JRR relies on third-party suppliers who are contracted to provide a range of services, including insurance broking, vehicle and petrol supply, telecommunications, equipment supply, engineering, security, data processing, data analysis, information broking, credit reporting, online computing, printing, contact centre, legal, accounting, business consulting, auditing, archival, delivery, mailing, surveillance, investigation, payroll, superannuation, training, employee share scheme, staff benefits, travel and hospitality services. While personal information may be provided to these suppliers to enable them to perform the agreed tasks, JRR will make every effort to ensure that the supplier handles the personal information under appropriate privacy and confidentiality principles. JRR may require such suppliers to provide privacy undertakings and enter confidentiality agreements.
- g) JRR may disclose the personal information of its personnel to JRR's customers or prospective customers where appropriate, for example, to facilitate the provision of our services or meet our customers' regulatory or security obligations.
- h) JRR aims to cooperate with government agencies and may disclose personal information where appropriate or in response to reasonable requests from such agencies, including workplace safety and SafeWork authorities.
- i) JRR may disclose personal information to parties and advisors involved in any purchase or potential purchase of any part of JRR's business.
- j) Some of the third parties to whom JRR may disclose personal information (including our suppliers and related companies) may be located in countries overseas. In these circumstances, JRR will either obtain your express or implied consent, use reasonable endeavours to ensure that your personal information will receive protection similar to that it would have if the information were in Australia or otherwise comply with relevant laws restricting cross-border disclosure of personal information.

Credit reporting

JRR provides some products and services to customers on credit terms. While this is commercial credit rather than consumer credit, JRR may have reason to handle personal information about consumer creditworthiness in connection with those arrangements, for example, where JRR provides credit to sole traders or individuals who offer personal guarantees. This section applies only concerning that sort of personal information ("credit-related personal information").

JRR may collect, hold and disclose any credit-related personal information about an individual permitted under the Privacy Act, including:

G3-01 Privacy Policy

- a) name, sex, date of birth, driver's licence number, employer name and three most recent addresses;
- b) the fact that the individual has applied for credit and the amount and type of credit and the credit limit;
- c) confirmation of previous information requests to credit reporting bodies made by other credit providers, mortgage insurers and trade insurers;
- d) details of the individual's credit providers;
- e) start and end dates of credit arrangements and specific terms and conditions of those arrangements;
- f) permitted payment default information, including information about related payment arrangements and subsequent repayment;
- g) information about serious credit infringements (e.g. fraud);
- h) information about adverse court judgments;
- i) publicly available information about the individual's creditworthiness;
- j) certain insolvency information from the National Personal Insolvency Index; and
- k) any credit score or credit risk assessment indicating a credit reporting body's or credit provider's analysis of your eligibility for consumer credit.

Where we collect credit-related personal information about you from a credit reporting body (**CRB**), we may use that information to produce our assessments and ratings regarding your creditworthiness.

We may exchange credit-related personal information (including the information types described above) with CRBs to, where permitted by law:

- a) assist those bodies in maintaining information about you to provide to other credit providers for credit assessments;
- b) assess a credit application made by you or an application to be a guarantor;
- c) mortgage credit;

G3-01 Privacy Policy

- d) collect overdue payments; and
- e) create assessments and ratings of your creditworthiness.

We may also exchange your personal information with debt collection agencies, debt buyers, and persons you authorise.

Please see other sections of this Privacy Policy for further information regarding access, correction, complaints, cross-border disclosures of personal information and how we collect and hold personal information. In some cases, we are subject to further obligations under the Privacy Act regarding credit-related personal information. This Privacy Policy is not intended to limit or exclude those obligations. Additional privacy consents and notifications may also apply where we provide credit.

Personal information quality

JRR's objective is to ensure that all personal information collected by JRR is accurate, complete and up-to-date. To assist JRR in achieving its objective, please get in touch with the Privacy Officer (details below) if any of your details change. Further, if you believe that the information JRR holds is not accurate, complete or up-to-date, please contact the Privacy Officer to have the information corrected.

Personal information security

- a) JRR is committed to keeping your personal information secure. We will take reasonable precautions to protect your personal information from loss, misuse, interference, and unauthorised access, disclosure, and alteration.
- b) Your personal information may be stored in hard copy documents or electronically on our software or systems.
- c) JRR maintains physical security over its paper and electronic data stores, such as locks and security systems. JRR also supports computer and network security using passwords to control and restrict access to authorised staff for approved purposes. Where information is susceptible, the information is overwritten and then manually deleted.

Access to personal information

- a) You may request access to the personal information JRR holds about you.
- b) The procedure for gaining access is as follows:

G3-01 Privacy Policy

- 1) All requests for access to your personal information should be addressed to the Privacy Officer;
 - 2) You should provide as much detail as possible regarding the business entity, department or person to whom you believe your personal information has been provided, and when, and about the specific information you seek, as this will allow us to process your request faster;
 - 3) JRR will acknowledge your request within 14 days, and access will usually be granted within 14 days or if it is more complicated 30 days. JRR will inform you if this timeframe is not achievable;
 - 4) You will be asked to verify your identity;
 - 5) A fee may apply to such access if an access request is onerous or time-consuming. Such a fee will cover staff costs involved in locating and collating information and reproduction costs and will not exceed legal maximums (if any);
 - 6) Depending on the circumstances, you may be forwarded the information by mail or email, or you may be allowed to inspect your records at the appropriate place personally; and
 - 7) You will be allowed to correct any personal information that is no longer accurate.
- c) In some circumstances, we may not be in a position to provide access. Such events include where:
- 1) Access would create a serious threat to safety;
 - 2) Providing access will have an unreasonable impact on the privacy of other individuals;
 - 3) Denying access is required or authorised by law;
 - 4) The request is frivolous;
 - 5) Legal proceedings are underway or are anticipated, and the information would not be available through the process of discovery about those proceedings;
 - 6) Negotiations may be prejudiced by such access; or
 - 7) Access would reveal a commercially sensitive decision-making process.

G3-01 Privacy Policy

- d) If JRR denies access to your personal information, we will provide you with reasons in writing.

Changes to this policy

JRR may change this Policy from time to time for any reason and will update the Policy accordingly.

Complaints

You are entitled to complain if you believe your privacy has been infringed. All complaints should initially be in writing and directed to the Privacy Officer. JRR will respond to your complaint as soon as possible, within 14 working days, to let you know who is responsible for managing your query. We will try to resolve the complaint within 30 working days. When this is not possible, we will contact you to estimate how long it will take to handle the complaint.

If you believe JRR has not adequately dealt with your complaint, you may complain to the Australian Information Commissioner as follows:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Email: www.oaic.gov.au

Privacy Officer's contact details

Please address all written correspondence to the following:

Private & Confidential
c/- Chief Operating Officer
JR Richards & Sons
PO Box 500
Tuncurry NSW 2428
Email: admin@jrrichards.com.au