

# PRIVACY POLICY

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REMA TIP TOP (the Company) understands the importance of Privacy and is committed to ensuring the appropriate collection, processing and storage of personal information in accordance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) (the Act). This Privacy Policy sets out the Company's policies in relation to the management of your personal information. Unless you give us your consent to do otherwise, we will only collect, use and disclose your personal information in accordance with this Privacy Policy.

You can obtain information about the APPs and your privacy rights at the website of the Office of the Australian Information Commissioner.

## What is Personal Information?

Personal Information is information or an opinion (whether true or not) about an individual whose identity is apparent or can reasonably be ascertained from that information or opinion.

It may include:

- your name, address, occupation and contact details (office and home address, telephone numbers and email address) or photos of you;
- your personal details, such as date of birth, qualifications, titles, passport details, next of kin;
- medical information to the extent that it is relevant to our functions and responsibilities under, and authorised by, legislation, including the Australian Standards, Worker's Compensation and Injury Management Acts and Occupational Safety and Health Acts; and
- records of your communications, training and test results, and other interactions with us.

Where relevant we may ask you for other information, for example, qualifications and employment history if you are applying for employment with us as well as bank account and superannuation account details and a tax file number if you obtain employment with us.

Furthermore, some Personal information can be sensitive in nature. This includes information about a person's race, ethnicity, political opinions, membership of political associations, membership of professional associations and trade unions, religious or philosophical beliefs, sexual preferences, health and genetic information or criminal records.



## **What sort of Information do we Collect?**

We collect information, including personal information about you that is relevant to our business relationship with you or your employer and is necessary for us to conduct our business.

Please note, if you apply to work for us as an employee or seek to provide your services as a contractor we may require you to undergo a pre-placement health assessment which will involve the collection of sensitive information, including health information. We may also engage third parties to conduct background checks. If you become our employee, the personal information provided to us during the recruitment process will become part of your employee record and this policy will not apply to the extent that we use the information in relation to your employment with us.

## **How do we Collect Information?**

We may collect personal information in a variety of ways, including from you directly (including when you interact with us in writing, electronically or via telephone), when you visit our website (including when you submit a contact form or an application for employment), when you participate in our events or promotions, from public sources of information and marketing and similar lists which are legally acquired by us. At all times the collection of this information is obtained by lawful means in a manner that respects your privacy.

Where practical, we will collect your personal information from you directly. However, we may also collect your personal information from a third party. For example, clients who use our services and contractors or suppliers we engage to assist us in the provision of those services. We may also collect your personal information from referees you have nominated in any job application.

## **Use and Disclosure of Personal Information**

We use personal information to enable us to provide operational, maintenance and asset management services, for recruitment purposes, to communicate with our shareholders, to respond to your inquiries, for business development including existing and prospective customers, website improvement and marketing purposes including undertaking data analytics and research.

However Personal information provided by you to the Company will only be used by the Company for the primary purposes for which you provided it and for other secondary purposes directly related to that primary purpose. The Company will not otherwise disclose your personal information without your consent unless otherwise authorised by regulatory bodies and/or legislation.



We may also transfer personal information in connection with a merger or sale involving all or part of Convatech or as part of a corporate reorganisation or share sale or other change in corporate control, including a bankruptcy.

## **Third Parties**

We may transfer or disclose personal information to the following 'Third Parties':

- Other companies within the REMA TIP TOP Group and their employees;
- External service providers, such as contractors, consultants (including information technology consultants) or suppliers who we engage in the provision of our services. These third parties are only permitted to use the information for the services or function for which they have been engaged, and are required to have in place reasonable safeguards for protecting personal information; or
- to any person where necessary or desirable in connection with the provision of our services (our primary purpose), such as to customers, regulatory authorities and other parties;
- as necessary to our external advisers such as legal representatives and accountants;
- where required or authorised by law; and
- where you consent to the disclosure.

Where applicable we may rely on employee and related bodies corporate exemptions that are available to us under the Privacy Act when using or disclosing personal information.

## **Disclosure overseas**

We may deal with third parties, such as service providers, that have part of their operations located overseas. Further, Rema Tip Top is a global entity with its head office and other regional offices all located overseas. As a result, your personal information may be disclosed to a recipient in a foreign country, including but not limited to Germany, the United States of America, Singapore, South Africa, and the United Kingdom. If you are employed by Rema Tip Top in a foreign country (or apply to do so) we may also disclose your personal information to an overseas recipient, including in response to an inquiry from the relevant authority in that place.

If you do not want your personal information to be disclosed, we will accommodate your request provided that the disclosure is not required by law.



## **What do we do to keep personal information secure?**

We, and our service providers, take reasonable steps to protect personal information from misuse, loss and unauthorised access, modification or disclosure using physical, electronic and procedural safeguards. To keep electronic information secure, we use a range of security measures, such as restricting access to users who have a valid username and password.

## **Cookies and Other Technologies**

The Company may collect personal information and other data from you through the use of a Cookie or other automated means including server logs. "Cookies" are small text files a website can use to recognise repeat users, store registration data, facilitate the user's ongoing access to and use of the website, allow a website to track usage behaviour and compile aggregate data that will allow content improvements. The type of information collected by The Company through Cookies and other means may include your server address; your domain name; your IP address; the date and time of your visit; the pages accessed and documents downloaded; the previous site visited; the type of browser you used. You may choose to disable Cookies at any time through your web browser security settings.

Other websites, including links to other websites that appear on The Company website from time to time, have their own privacy policies. When you provide personal information at any one of those sites, you are subject to the privacy policy of the operator of that site, and not The Company's Privacy Policy. We encourage you to read each such privacy policy before submitting any personal information.

## **Access and Amendment Requests**

Subject to some exceptions permitted by law, you have a right to access your personal information held by The Company. To request your information, a request must be submitted in writing. You should anticipate that it might take some time to process your request for access, as there may be a need to retrieve information from storage and review it in order to determine what information is relevant.

Charges may apply to cover the cost of us accessing and providing you with this information. If we cannot provide you access, we will provide a written statement of our reasons.

If the information held about you is inaccurate, incomplete or not up to date you may request that The Company make an amendment to that information. This requested amendment must be submitted in writing.

It is The Company's policy that all requests be handled in a timely, effective, fair and consistent manner.



## Complaints

If you are concerned about the manner in which The Company have collected or handled your personal information, or simply require any further information about our management of your personal information, please contact the Company's People & Culture team in writing or contact the People & Culture team to obtain a Privacy Complaint Form. All complaints will be investigated and a response to your complaint will be provided in writing no later than 30 days from receipt of the complaint.

Furthermore, under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

The Commissioner can be contacted at:

GPO Box 5218  
Sydney NSW 2001  
Phone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
[www.oaic.gov.au](http://www.oaic.gov.au)

It is an expectation that all the Company employees comply with this Privacy Policy.

Failure to comply with this policy may result in:

- Individual civil liability (a financial penalty and liability for damages);
- Disciplinary action, including termination of employment;
- Exposure of Rema Tip Top to fines or financial penalties for breach of Privacy Laws.

If you have any questions regarding this Policy, please contact the HR team on (02) 4935 0200 or by email [hr@rema-tiptop.com.au](mailto:hr@rema-tiptop.com.au)

## Changes to this Privacy Policy

This is our current Privacy Policy outlining our personal information management practices. This Privacy Policy replaces any other privacy policy published by us to date. We may vary this Privacy Policy from time to time. Please contact us if you wish to obtain a copy of our current Privacy Policy.