

# **Business Privacy Policy**

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# **Revision Record**

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# **Issue History**

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# **Contents**

1	Intro	roduction					
2	What	hat is Personal Information					
3	What	at Personal Information Do We Collect					
4	How	w do we Collect Your Personal Information					
5	How Do We Use and Disclose Your Personal Information						
	5.1	Transf	fer of Personal Information Overseas	3			
	5.2	5.2 How do we Protect Your Personal Information					
	5.3	Online	e Activity	4			
		5.3.1	Cookies	4			
		5.3.2	Website analytics	4			
	5.4	Reten	tion of Personal Information	4			
	5.5	4					
	5.6	5.6 Links to Third-Party Sites					
	5.7 Inquiries and Complaints						
	5.8	How t	o Contact Us	5			

#### 1 Introduction

Leichhardt Industrials Group Pty Ltd ACN 656 192 602 and its subsidiaries (**Leichhardt, we** or **us**) values and respects the privacy of the people we deal with.

Leichhardt is committed to protecting your privacy and complying with the Privacy Act 1988 (Cth) (**Privacy Act**) and other applicable privacy laws and regulations.

This privacy policy (**Policy**) describes how we collect, hold, use, and disclose your personal information and maintain its quality and security.

## 2 What is Personal Information

"Personal information" means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g. your name) or indirectly.

## 3 What Personal Information Do We Collect

The personal information we collect about you depends on the nature of your dealings with us or what you choose to share with us.

Depending on the circumstances, the personal information we collect about you may include your:

- name;
- job title;
- contact details (e.g. mailing and street address, email address, phone number);
- emergency contact information;
- employment history;
- qualifications;
- bank details; and
- date of birth, gender, and occupation.

Some personal information is considered 'sensitive information' for the purposes of the Privacy Act.

If you apply for a position with Leichhardt, we may need to collect sensitive information about you. This might include any information or opinion about your health, membership of a professional or trade association, or criminal record (if any).

We may also store, use and disclose information about your membership of a professional or trade association if it is disclosed to us in the course of your business dealings with us.

If we collect your sensitive information, we will do so only with your consent, or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information. The provision of sensitive information on a voluntary basis (including, for example when applying for a position with Leichhardt) will be taken to be consent for this purpose.

You do not have to provide us with personal information. Where lawful and practicable to do so, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you choose to deal with us in this way or choose not to provide us with relevant and required information, we may not be able to consider your employment application, or conduct business with you, as the case may be.

#### 4 How do we Collect Your Personal Information

We collect your personal information which:

- you provide when interacting with us over the phone, in person or online;
- you provide in connection with applying for a position as our employee or in the process of registering as a supplier or customer;
- you provide in the course of promoting or supplying goods and services to us or enabling us to supply goods and services to you; or
- is contained in any documentation or correspondence you provide to us.

We may also collect your personal information from third parties or through publicly available sources where it is unreasonable or impractical to collect that information from you.

#### 5 How Do We Use and Disclose Your Personal Information

We use personal information for many purposes in connection with our business functions and activities, including the following purposes:

- in relation to your application for employment;
- to verify any information you provide to us, including your identity, credentials, and ability to fulfil your contractual obligations;
- to establish and administer our business relationship with you;
- to seek quotations or invite you to tender or to otherwise evaluate whether to purchase goods and services from you;
- to order and administer the purchase of goods and services from you or to supply goods and/or services to you;

- to manage your visit to site and coordinate any travel and accommodation arrangements;
- for processing and authorising payment and/or collecting payment from you for goods and/or services rendered;
- to assist with insurance and managing claims and other matters that may arise in the course of your relationship with us;
- to comply with our legal obligations; and
- for other purposes connected to our business relationship.

We may also disclose your personal information:

- to our professional advisors, contractors or other service providers we may engage from time to time to carry out, advise or assist with the carrying out our business functions and activities, who may in turn handle your personal information in accordance with their own privacy policies;
- to government bodies as required or permitted by law; and
- to other third parties where you have given your express or implied consent.

We may also use and disclose your personal information for secondary purposes to those for which we may have collected your personal information if they are for a related purposes and you would reasonably expect us to use and disclose your personal information for such purposes, or with your consent, or as may be required or authorised by law or permitted under the Privacy Act.

#### 5.1 Transfer of Personal Information Overseas

From time to time, we may use of software or cloud-based computing services which could result in your personal information being disclosed and stored on computer servers located outside of Australia. We may also be required on occasion to provide personal information to our directors and shareholders who may be located overseas, including without limitation in the United States, Canada, United Kingdom, Germany and India.

Where we disclose your personal information overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained. We will only disclose to overseas third parties if:

- you have given us your consent; or
- we reasonably believe that the overseas recipient is subject to a law or binding scheme that is, overall, at least substantially similar to the protections provided under the Privacy Act and there are actions you can take to enforce such law or binding scheme.

#### 5.2 How do we Protect Your Personal Information

Leichardt will take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by:

- having robust physical security of our premises and databases/records;
- taking measures to restrict access to only personnel who need that personal information to effectively provide services to you; and
- having technological measures in place (for example, anti-virus software, firewalls).

# **5.3 Online Activity**

#### 5.3.1 Cookies

Our website uses cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it.

These cookies recognise when your device has visited our website before, so we can distinguish you from other users of the website. This improves your experience and assists in the function of the Leichhardt website.

If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

#### 5.3.2 Website analytics

Our website uses analytics to help us better understand visitor traffic. Although this data is mostly anonymous, we may connect it to you under certain circumstances.

#### 5.4 Retention of Personal Information

We will not keep your personal information for longer than we need to.

In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to do so to comply with applicable laws, such as record-keeping obligations.

## 5.5 How to Access and Correct Your Personal Information

Leichhardt will endeavour to keep your personal information accurate, complete, and up to date. If you wish to make a request to access and / or correct the personal information we hold about you, you should make a request by contacting us and we will usually respond within 15 working days.

# 5.6 Links to Third-Party Sites

Our website may contain links to websites operated by third parties. If you access a third-party website through our website, personal information may be collected by that third-party website.

We make no representations or warranties regarding the privacy practices of any third-party provider or website and are not responsible for their privacy policies or content. Third-party providers/websites are responsible for informing you about their own privacy practices, and we encourage you to read their privacy policies.

# 5.7 Inquiries and Complaints

For complaints about how Leichhardt handles, processes or manages your personal information, please contact the Leichhardt Office Administrator.

Note that we may require proof of your identity and full details of your request before we process your complaint.

Please allow up to 28 days for Leichhardt to respond to your complaint. It will not always be possible to resolve a complaint to everyone's satisfaction. If you are not satisfied with Leichhardt response to a complaint, you have the right to contact the Office of the Australian Information Commissioner (at www.oaic.gov.au/) to lodge a complaint.

## 5.8 How to Contact Us

If you have a question or concern in relation to our handling of your personal information or this Policy, you can contact us for assistance as follows:

• Email: <u>Admin@leic.com.au</u>

Contact number: 0411 357 559

• Attention: Officer Manager

Address: Suite A7, 435 Roberts Rd, Subiaco, Western Australia 6008