

## Privacy Policy - Plasgain Pty Ltd

The last update to this document was 10 August 2021.

### Introduction

Plasgain Pty Ltd ACN 629 147 520 (**Company, we, us, our**) and its related entities are committed to complying with applicable privacy laws in relation to the personal information that we collect in the course of running our business.

Please take a moment to read our Privacy Policy as it explains how we manage personal information including our obligations and your rights in respect of our dealings with your personal information. We may, in connection with particular goods or services we offer or provide to you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in this Privacy Policy. In the event of any inconsistency between the provisions of this Privacy Policy and those other disclosures, the other disclosures will apply. Where applicable privacy laws provide for exceptions or exemptions, we may rely on those exceptions or exemptions in our information handling practices.

This Privacy Policy (other than section 9) explains how we manage personal information about individuals other than employees. Section 9 explains the position of employees.

### Key definitions

In this document:

- "**APPs**" means the Australia Privacy Principles set out in the Privacy Act;
- "**personal information**" has the meaning set out in the Privacy Act, and (in summary) means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or otherwise;
- "**Privacy Act**" means the *Privacy Act 1988* (Cth); and
- "**sensitive information**" has the meaning set out in the Privacy Act, and includes certain specific types of personal information such as health information, and information about a person's racial or ethnic origin, sexual orientation or practices, criminal record, religious beliefs or affiliations, political opinions, membership of a political, professional or trade association, and biometric and genetic information.

### 1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- when you make an inquiry or order in relation to goods or services, including through our website located at <https://plasgain.com.au/> (the **Website**);
- when you enter into contracts with us for our goods or services;
- from correspondence (whether in writing or electronically) or when you contact us via telephone, social media platforms or other means;
- if you attend any of our premises, we may record certain contact details so that we can comply with applicable laws, and we may also record your image and/or voice if we have surveillance systems operating at those premises;

- as otherwise required to manage our business.

However, in certain cases we may collect personal information from publicly available sources (for example, telephone directories) and third parties, such as suppliers, recruitment agencies, your employers, contractors, our clients and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

## **2. Types of personal information we collect**

The types of personal information we collect about you depends on the circumstances in which the information is collected. Typically, the types of personal information we collect include (but is not limited to) your name, address, email address and phone numbers.

If we enter into contracts with you, request or receive goods or services from us or have any other commercial dealings with us, we may also collect your signature, date of birth, credit card and /or banking details, and billing information.

If you are an individual contractor to us (e.g. consultant) or apply for a role with us, we may also collect information relevant to your engagement with us including qualifications, length of engagement, resume, current and former employment details, pay rate and salary, bank details, feedback from supervisors, training records and logs of your usage of our equipment (e.g. phones, computers and vehicles).

If you attend a premises we operate or manage, we may:

- collect certain contact details that you provide to us (which may be via digital check-in apps), including the date and time of attendance, including so that we can comply with applicable laws (such as public health directives). If we collect such information to comply with a particular law, we will only use and disclose it in accordance with applicable laws; and
- record your image and/or voice through the use of Closed-Circuit Television (CCTV) systems footage of you via our CCTV devices, for the purposes of managing security of the premises and health and safety of occupants and the public generally.

If you access our website or mobile apps, we may utilise cookies to collect additional information about your use of our website and apps. Please see the cookies section below for further details. If when you are on our website or our apps and you have provided us with permission to access your device location, we may collect information about your geographical location. If we communicate with you by email, we may use technology to identify you so that it will be in position to know when you have opened the email or clicked on a link in the email.

In addition to the types of personal information identified above, we may collect personal information as otherwise permitted or required by law.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services and/or certain functionality of our Websites.

## **3. Our purposes for handling your personal information**

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances. The purposes for which we use and disclose your personal information will depend on the circumstances in which we collect it. Whenever practical we endeavour to inform you why we are collecting your personal information, how we intend to use that information and to whom we intend to disclose it at the time we collect your personal information.

We may use or disclose your personal information:

- for the purposes for which we collected it (and related purposes which would be reasonably expected by you);
- for other purposes to which you have consented; and
- as otherwise authorised or required by law.

In general we collect, use and disclose your personal information so that we can do business together and for purposes connected with our business operations.

Some of the specific purposes for which we collect, hold, use and disclose personal information are as follows:

- to provide you with our goods and services;
- to receive products or services from you;
- to consider you for a job (whether as an employee or contractor) or other relationships with us;
- to provide you with tax invoices for our goods and services;
- to comply with our legal and regulatory obligations;
- to protect the security, health and safety of our premises, facilities, personnel and visitors;
- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

#### **4. Who we disclose your personal information to**

We may disclose your personal information to third parties in connection with the purposes described in section 3 of this Privacy Policy. This may include disclosing your personal information to the following types of third parties:

- our suppliers, contractors and organisations that provide us with technical and support services or who manage some of our business functions;
- our related entities (who may use and disclose the information in the same manner we can) and shareholders;
- our accountants, insurers, lawyers, auditors and other professional advisers;
- any third parties to whom you have directed or permitted us to disclose your personal information (e.g. referees);
- in the unlikely event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors; and
- debt collection agencies.

We may also disclose your personal information in accordance with any consent you give or where disclosure is authorised, compelled or permitted by law.

If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

If you post information to certain public parts of our Website or to our social media pages, you acknowledge that such information may be available to be viewed by the public. You should use discretion in deciding what information you upload to such sites.

#### **5. Protection of personal information**

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas. We use

a range of security measures to protect the personal information we hold, including by implementing IT security tools to protect our electronic databases.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

## **6. Direct marketing**

Like most businesses, marketing is important to our continued success. We therefore like to stay in touch with customers and let them know about new offers and opportunities. We may provide you with information about products, services and promotions either from us, or from third parties which may be of interest to you, where:

- you have consented to us doing so; or
- it is otherwise permitted by law.

You may opt out at any time if you no longer wish to receive direct marketing messages from us. You can make this request by contacting our Privacy Officer.

## **7. Accessing and correcting your personal information**

You may contact our Privacy Officer (see section 11) to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access (which we will only do in accordance with applicable laws), we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to the personal information we hold about you.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

## **8. Overseas transfers of personal information**

We do not generally disclose personal information to recipients located outside Australia.

## **9. Employees**

We collect information in relation to employees as part of their application and during the course of their employment, either from them or in some cases from third parties such as recruitment agencies. Such information may include contact details, qualifications, resume, current and former employment details, pay rate and salary, bank details, feedback from supervisors, training records and logs of your usage of our equipment (e.g. phones, computers and vehicles).

Under the Privacy Act, personal information about a current or former employee may be held, used or disclosed in any way that is directly connected to the employment relationship. We handle employee information in accordance with legal requirements and our applicable policies in force from time to time.

## **10. Resolving personal information concerns**

If you have any questions, concerns or complaints about this Privacy Policy or how we handle your personal information, including if you believe we have breached the APPs, please contact our Privacy Officer (see section 11).

When contacting us please provide as much detail as possible in relation to your question, concern or complaint.

We take all complaints seriously, and will respond to your complaint in accordance with any applicable timeframes imposed by law and otherwise within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner  
GPO Box 5218, Sydney NSW 2001  
Telephone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

#### **11. Contact details of Privacy Officer**

The contact details for our Privacy Officer are as follows:

Postal address: 2/68 Weerong Road, Drouin VIC 3818  
Telephone: 0455 747 503  
Email [info@plasgain.com.au](mailto:info@plasgain.com.au)

#### **12. Links**

Our Website may contain links to other websites operated by third parties. We make no representations or warranties in relation to privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices and procedures.

#### **13. Changes**

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.