

Human Resources Policies and Procedures

Issue Date: 15 September 2022

Reference: H-P-028

SUBJECT: Privacy Policy

APPLIES TO:

- a) All Australian employees employed by Spicers Australia Pty Ltd and/or Spicers Limited
- b) All temporary/labour hire employees
- c) Contractors
- d) Suppliers
- e) Customers
- f) Website, E-commerce, and Social Media Users

AUTHORISED BY: Chief Executive Officer, Spicers Limited

REPLACES POLICY DATED: December 2015

The Company may vary, amend, terminate, or replace this policy at any time at the discretion of the Company and by authority of the Chief Executive Officer. Any reference to this policy in contracts of employment or any other Company-issued documentation is deemed to refer to this policy as varied from time to time.

1. POLICY

Spicers are committed to ensuring the privacy and security of all personal information collected from employees, customers, suppliers, and other parties that make contact with us.

This policy outlines ongoing obligations on the part of Spicers in respect to how we manage personal information collected in the course of carrying out business activities.

We adhere to the Australian Privacy Principles ('APPs') contained in the *Privacy Act 1988 (Cth)*. The APPs govern the way in which we collect, use, disclose, store, secure and dispose of personal information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

This policy may be updated from time to time in accordance with legislative or business changes.

2. DEFINITIONS

For the purposes of this Policy:

- a) 'The Act' means the *Privacy Act 1988 (Cth)* or the Australian Privacy Principles contained within The Act.
- b) 'Spicers', 'the Company', 'we', 'us', and 'our' means Spicers Australia Pty Ltd (ABN 84 007 228 113) and/or Spicers Limited (ABN 70 005 146 350).

3. RESPONSIBILITIES

It is the responsibility of all Company employees to act in accordance with this policy and carry out obligations regarding Personal Information under the Act.

Employees who fail to comply with this Policy may be subject to disciplinary procedures.

Employees or other individuals in breach of the Act may be liable for penalties under The Act and other relevant legislation.

4. PERSONAL INFORMATION

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we may collect include:

- a) General identification information such as names, job title, occupation, date of birth and place of work;
- b) Contact details such as address, email address, home address, phone and mobile number and internet protocol (IP) address;
- c) Relevant company, business and financial information;
- d) Educational qualifications, employment history, salary and references;
- e) Information contained in identification documents such as passports and driver's licences;
- f) Government-issued identification numbers such as tax file numbers;
- g) Financial information such as credit card and bank account details;
- h) Details of superannuation and insurance arrangements; and
- i) Visa or work permit status, immigration status, and related information.

In some circumstances it may be necessary for us to collect some forms of Sensitive Information, which may include:

- a) Racial or ethnic origin;
- b) Gender and gender identity;
- c) Disability;
- d) Citizenship;
- e) Union or professional body membership;
- f) Criminal history; and
- g) Health information.

5. METHODS OF COLLECTION

- a) The Company collects information by methods including (but not limited to):
 - i. Telephone or fax;
 - ii. Email;
 - iii. Credit applications;
 - iv. Recruitment and selection processes;
 - v. In the course of your employment with Spicers;
 - vi. Via our website www.spicers.com.au or website cookies;
 - vii. Via social media; or
 - viii. Via trade and industry events and publications.

Where reasonable and practicable to do so, the Company will collect Personal and Sensitive Information only from the individual or business. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that the individual or business is made aware of the information provided by the third party.

6. WEBSITES AND APPLICATIONS

Spicers or others acting on our behalf may use cookies, pixel tags, web beacons or other similar technologies in connection with the operation of our websites or applications. These

technologies may collect and store non-Personal Information. We utilise these technologies to research and understand how our websites and applications are used, to develop our products and services, to personalise your online experience with Spicers and to assist us with targeting our advertising and marketing.

Our service providers or vendors may also use cookies and related technologies to personalise your experience. If you are visiting a URL other than spicers.com.au or an associated online application, you should carefully review the privacy policies and terms and conditions of use of those web sites or applications.

You may elect not to receive cookies. This may interfere with, or make you unable to use, certain functionalities on websites using cookies and you may not be able to take full advantage of the services available to you on our website.

7. INFORMATION SECURITY & STORAGE

- a) The Company stores information in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification, or disclosure.
- b) When information is no longer needed for the purpose for which it was obtained, reasonable steps will be taken to destroy or permanently de-identify Personal and Sensitive Information.
- c) Employment records, financial records, information related to provision of credit, records of remittance of remuneration, and other types of information will be retained for a minimum of seven (7) years or as required under the governing legislation.

8. USE AND DISCLOSURE

- a) The Company collects information for reasons including (but not limited to):
 - i. Provision of credit;
 - ii. Sale and supply of goods and services;
 - iii. Marketing;
 - iv. Compliance with legislative requirements;
 - v. Recruitment and selection; and
 - vi. Continuing employment.
- b) We may also use information for a secondary purpose closely related to the primary reason for collection, in circumstances where use or disclosure would reasonably be expected. If information is collected for marketing purposes, the individual or business may request at any time to be removed or excluded from digital or mailing distribution lists.

The Company may disclose Personal and Sensitive Information in certain circumstances including:

- a) To third parties where the individual or business has consented to the use or disclosure; or
- b) Where required or authorised by law.

9. INFORMATION QUALITY

The company will take reasonable steps to make sure that Personal Information is accurate, complete, and up to date. When advice is received that information is inaccurate, or out of date, records will be updated as soon as is practicable.

10. ACCESS TO INFORMATION

- a) Individuals or Businesses may access information held, update it, or correct it, subject to certain exceptions. Access requests must be made in writing.
- b) The Company will not charge an access fee, though under certain circumstances administrative costs (printing, postage, etc.) may be charged.
- c) Proof of identity or affiliation (in the case of a business or other entity) must be provided before information is released.

11. PRIVACY OFFICERS

Enquiries related to this policy, Spicer's privacy measures, or information access requests, can be made to:

Michael Clark
Group Finance & Governance Manager
michael.clark@spicers.com.au

Katherine Woodman
HR Manager ANZ
katherine.woodman@spicers.com.au