

1. Introduction

This Privacy Policy has been published to provide an overview of how and when personal information is collected, disclosed, used, stored and otherwise handled by Cleanaway Waste Management Limited and its related companies ("**CWY**").

CWY treats the handling of your personal information very seriously. To that end, CWY has systems and procedures in place to protect your privacy in relation to the handling of your personal information.

CWY abides by applicable privacy laws, including the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) ("**Privacy Act**"). The APPs define how we are permitted to collect, disclose, use, and store personal information. Certain exemptions apply under those laws, including in relation to employee records. CWY may rely on those exemptions despite this Policy. Further information about privacy laws is available from the regulator (the Office of the Australian Information Commissioner ("**OAIC**")) whose details are set out in section 11 (Complaints) of this Policy.

2. Types of personal information we collect, and how we collect it

- a) Personal information is information or an opinion about an individual who is identified or reasonably identifiable. The types of personal information collected by CWY generally includes an individual's name and contact details (including address, phone, fax and e-mail).
- b) CWY may also collect other types of personal information about you from time to time, depending on the circumstances and the nature of our relationship with you. For example:
 - if you make an inquiry (for example, via our website, telephone hotline, contact email addresses or social media pages), we will collect details of your inquiry for the purpose of considering and responding to your inquiry;
 - if you contact us to report an issue, problem or complaint, we will collect details of your report to investigate and address the matter;
 - if you engage us to provide products and services we may collect information necessary to do so (such as your billing and payment details, and records of the products and services that you engage us to provide);
 - if you wish to obtain products and services from us on credit terms we may need to collect information about you (such as credit information and drivers licence details) to assess your credit application and administer the credit if your application is successful - see the section 4 (Credit Reporting) of this Policy for further details;

- if you apply for a job vacancy with Cleanaway, we may collect the information you provide as part of your application as well as information from other sources (such as from your referees) in order to consider you for the position and, if you are not successful, keep in contact with you about future positions - see section 6 (Employees and other Cleanaway staff) of this Policy for further details;
 - if you work at Cleanaway (whether as an employee or a contractor), we will collect various information as part of your employment record - see section 6 (Employees and other Cleanaway staff) of this Policy for further details; and
 - if you are work for a business or organisation that supplies Cleanaway with products or services, we may receive information about your role with that business or organisation for the purposes of administering the relevant products or services;
 - if you attend a premises or facility that we operate or manage, we may collect certain contact details that you provide to us (which may be via digital check-in apps). We collect this information to help us manage the security of our premises and facilities and in certain circumstances to 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
 - in circumstances where we need to verify your identity, in which case we may need to sight (or, where necessary, take copies of) your identification documents.
- c) CWY personnel are required to undergo a medical examination and drug and alcohol screening prior to and during the course of your employment with CWY.
- d) CWY does not collect personal information unless it is necessary for CWY to perform one or more of its functions and activities. On occasion, some of this personal information may be sensitive information (such as health information or criminal history information) and CWY will only collect that type of information with your consent, when required or authorised by law or when otherwise permitted under applicable privacy laws. Examples of situations where we may need to collect your sensitive information include:
- details of any injuries (i.e. health information) that may occur at our premises or facilities or in connection with our goods and services;
 - details of any disabilities or allergies (i.e. health information) you notify us of so we can accommodate any special requirements;
 - as part of the medical examination and drug and alcohol screening conducted of CWY personnel, as per item c) above;
 - biometric information (such as fingerprints) in order to provide secure access to our equipment (such as computers and plant equipment); and
 - criminal record details, as part of pre-employment checks that we undertake.
- e) CWY will generally collect personal information from you directly where reasonable and practical to do so. For example, CWY may collect personal information via telephone or letter, or when you provide a resume or enter an agreement.

- f) There may be other occasions when CWY may source personal information from another CWY company or an external third party including public sources and the parties described below in Section 3 (Purposes for which we collect, hold, use and disclose Personal Information) of this Policy.
- g) For security, health and safety, training, dispute resolution and quality assurance purposes, CWY may
 - monitor and record your communications with CWY (including email and telephone); and
 - operate video and audio surveillance devices in CWY's premises and in areas where our equipment (such as computers and plant equipment) are stored or used.
- h) If you do not wish to provide us with your personal information, CWY may not be able to provide you with our services or perform our functions that require that personal information. For example, CWY may not be able to contact you or make payments to you.

3. Purposes for which we collect, hold use and disclose personal information

- a) Personal information provided to CWY may be shared within the CWY group of companies.
- b) CWY may use and disclose your personal information for the purpose for which the personal information was initially collected.
- c) CWY 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) In the ordinary course of business, CWY uses and discloses personal information for a range of purposes including managing and securing our premises and facilities, internal auditing and administration, staff management, payroll, superannuation, health and safety, security, insurance (including work cover), providing and improving our services, record keeping, record storage and management, administering and securing our IT systems, websites and social media pages, 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 and helping us to identify business activities which may be of benefit or interest to you.
- e) CWY may also use or disclose your personal information with your express or implied consent, or without your consent if the use or disclosure is:
 - 1) required in order to investigate an unlawful activity;
 - 2) required by an enforcement body for investigative activities;
 - 3) necessary to prevent a serious threat to a person's life, health or safety, or to public health or safety; or
 - 4) otherwise required, permitted or authorised by law.

- f) As with most business organizations, CWY 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 storage and 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 in order to enable them to perform the agreed tasks, CWY will take reasonable steps to ensure that the supplier handles the personal information in accordance with appropriate privacy and confidentiality principles. For example, CWY may require such suppliers to provide contractual privacy undertakings and enter confidentiality agreements.
- g) CWY may disclose personal information of its personnel to CWY'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) If you report an issue or make a complaint or a claim, CWY may use and disclose the information you provide to investigate and resolve the relevant issue (or to process the claim, as applicable). This may include sharing details of your report, complaint or claim with third parties where this is:
- reasonably necessary for CWY to do so in order to properly investigate and resolve the relevant issue and/or process your claim; or
 - required or authorised by an applicable statute or other law that governs the processing of your report, complaint or claim (for example, workplace safety and workers compensation laws).
- i) CWY aims to co-operate with government agencies and may disclose personal information where appropriate or in response to reasonable requests from such agencies including workplace safety and work cover authorities.
- j) CWY may disclose personal information to parties and advisors involved in any purchase or potential purchase of any part of CWY's business.
- k) Some of the third parties to whom CWY may disclose personal information (including our suppliers and related companies) may be located in overseas countries (such as India, Vietnam, Cambodia and the USA). We may disclose your personal information to overseas recipients without your consent where permitted by the Privacy Act (and, in such circumstances, we will comply with the applicable requirements of the Privacy Act in doing so).

4. Credit reporting

CWY does not offer credit to individuals for consumer purposes. However, CWY may agree to provide some products and services to customers on credit terms.

While this is commercial credit rather than consumer credit, CWY may need to handle certain personal information in connection with those arrangements, for example where CWY provides

credit to sole traders, or individuals provide personal guarantees. This section applies only in relation to that sort of personal information (“credit-related personal information”).

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

- a) name, sex, date of birth, driver’s license 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 certain 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 credit worthiness;
- j) certain insolvency information from the National Personal Insolvency Index; and
- k) any credit report, 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 own assessments and ratings in respect of your credit worthiness.

We collect, hold, use and disclose credit-related personal information (including the information types described above) for the purpose of:

- a) Assisting CRBs to maintain information about you to provide to other credit providers for credit assessments;
- b) Assessing any credit application made by you or an application to be a guarantor;
- c) Providing commercial credit;
- d) Collecting overdue payments; and
- e) Creating our own assessments and ratings of your credit worthiness.

When we request a credit report from a CRB, we will provide information to the CRB that identifies you, and we may give them information about the type and amount of credit applied for or provided to you (or your company).

The CRBs we may use, including their contact details and how you can obtain a copy of their credit reporting policy details, are as follows:

- Equifax (Equifax Australia Information Services & Solutions Pty Limited), whose credit reporting policy is available at www.equifax.com.au/credit-reporting-policy; contact details: PO Box 964, North Sydney NSW 2059.

We may also exchange your personal information (or where you are a company, the personal information of each of your directors) with commercial credit bureaus or similar service providers who assist us with our credit risk assessment activities. These include:

- Creditor Watch, whose privacy policy is available at <https://creditorwatch.com.au/privacy/>; contact details: CreditorWatch, GPO Box 276, Sydney, NSW, 2001

A CRB may include the information we provide to them in reports to credit providers to assist them to assess your credit worthiness. If you fail to meet your payment obligations in relation to consumer credit we have provided or commit a serious credit infringement, we may be entitled to disclose this to the CRB.

You have the right to request CRBs not to:

- use your credit-related personal information to pre-screen you to determine your eligibility to receive direct marketing from credit providers; and
- use or disclose your credit-related personal information, if you reasonably believe you have been or are likely to be a victim of fraud.

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

You may access the personal information (including credit eligibility information and credit information) we hold about you, or request that we correct that information. You may make a complaint if you believe we have not complied with our legal obligations regarding your information under the Privacy Act or the *Privacy (Credit Reporting) Code 2014* (Cth).

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, and this Privacy Policy is not intended to limit or exclude those obligations. Additional privacy consents and notifications may also apply where we provide credit.

5. Marketing

Like most businesses, marketing and advertising is important to our continued success. We therefore like to stay in touch with our customers and let them know about new offers and opportunities amongst other things.

We may contact or advertise to you about a range of topics, including, but not limited to, products, services, events, news and promotions either from us, or from third parties which may be of interest to you, where:

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

We conduct direct marketing through various channels, including but not limited to phone, e-mail, SMS and post.

If you would like us to stop sending you direct marketing communications, you can do so by contacting the sender using the details set out in the communication or by using the opt-out facilities provided in the marketing communication (e.g. an unsubscribe link). If you have difficulty using (or would prefer not to use) these methods, you can contact our Privacy Officer (see contact details in section 12 of this Policy) with your unsubscribe request. It will then be forwarded to the relevant Cleanaway team for processing.

Please note that there are certain types of communications that you may not be able to opt-out from, such as communications that we are required or permitted by law to send you.

Like many organisations, we use e-mail analytics to track and measure the success of our e-mail newsletters and other e-mail campaigns. We use various technologies (such as tracking pixels) to collect information such as: which of our emails you have opened, which links you have clicked, which email client you are using, whether you opened our e-mail on a computer or mobile device, and the geolocation of your IP address. We use this data to analyse and improve the performance of our e-mail campaigns.

We may also collect use information about you for the purposes of online targeted advertising services that help our ads to reach you (and other people who may be interested in our products and services) on websites, apps and social media platforms across the Internet. These online targeted advertising services are operated by third party vendors, such as Meta (Facebook and Instagram) and Google.

Some of these services work by using non-identifying data about your behaviour and demographics that has been collected through cookies and other tracking technologies (such as pixels and device identifiers) when you use the Internet, including when you move between different websites and apps and use different devices. For example, third-party vendors may use cookies and/or device identifiers to serve ads based on your past visits to our websites. Your browser or device may provide you with the option to disable or opt-out of some of these cookies and other tracking technologies (such as device identifiers).

Other services require us to use limited amounts of your personal information. For example, we may include your information in a customer list that we provide to selected online advertising service providers so that we can conduct audience-based advertising. This allows us to show our ads to you (if you also use those platforms) and to other users of those platforms who share

similar characteristics with you. The customer list is usually hashed (to improve security and confidentiality) before it's processed by the service provider to target and serve our ads.

The data that is collected through these cookies and other tracking technologies, or provided by us, may be combined with other data (supplied by our advertising service provider, or third parties) to improve the targeting and serving of ads.

Our online advertising service providers also help us by measuring the effectiveness of our ad campaigns (e.g. conversion tracking) and providing us with analytics data that we use to inform and optimise our ad campaigns. These analytics are based on data that may be collected through cookies and other tracking technologies. The analytics data we receive is generally aggregated and non-identifying.

When we use any advertising service that requires us to use or disclose your personal information, we will only do so if we are permitted to do so by applicable privacy laws. You can notify us at any time if you would like us to stop using your personal information for these targeted advertising purposes. You can do this by contacting our Privacy Officer (see contact details in section 12 of this Policy) with your opt-out request. Our Privacy Officer will forward the request to the relevant Cleanaway team for processing.

You can also:

- Opt-out of certain online targeted advertising networks directly by visiting:
 - the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>; and
 - the Network Advertising Initiative's opt-out page: http://www.networkadvertising.org/managing/opt_out.asp
- view the relevant social media platform's website to learn more about how they collect and use your information and adjust your preferences regarding the types of advertising you are shown.

6. Employees and other Cleanaway staff

We collect information in relation to employees as part of their job application and during the course of their employment, either from the employee directly or, in some cases, from third parties such as recruitment agencies, referees, government bodies (e.g. police checks, if required) and academic and professional bodies (e.g. to validate details and currency of qualifications).

The information we collect may include contact details, qualifications, resume, current and former employment details, pay rate and salary, bank details, feedback from supervisors and training records.

We may also collect details of disabilities, allergies and health issues that may impact the employee's role, or which arise while on our premises or in the performance of the employee's duties (so we can accommodate and otherwise assist the employee with any such health requirements or incidents, including any rehabilitation, return-to-work and workers compensation processes), and the results of drug and alcohol testing we may conduct in accordance with applicable laws for health and safety purposes.

We collect camera/video footage of employees while on our premises (via CCTV) and logs of the employee's usage of our equipment (e.g. phones, computers and plant equipment) on a continuous and ongoing basis using various technologies, including monitoring:

- email, internet and network use; and
- the location of our equipment via GPS.

We may also collect and use biometric information and templates (such as fingerprints) in order to utilize time sheet or attendance monitoring technologies, or provide secure access to equipment.

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.

7. Personal information quality

CWY's objective is to ensure that all personal information collected by CWY is accurate, complete and up-to-date.

To assist CWY in achieving its objective and if you believe that the information CWY holds about you is not accurate, complete or up-to-date, you can use the self-service options that we provide (for example, your account on our online customer portal) to update certain details.

You may also contact the Privacy Officer in order to have the information corrected (see section 9 (Accessing and correcting your personal information) of this Policy).

8. Personal information security and storage

- a) CWY is committed to keeping your personal information secure, and we will take reasonable precautions to protect your personal information from loss, misuse and interference and from unauthorised access, disclosure and alteration.
- b) Your personal information may be stored in hard copy documents, or electronically on our software or systems. As with most businesses, some of our electronic records are held in cloud storage provided by our third party IT service providers. Some cloud services may store data on servers located outside of Australia.
- c) CWY maintains physical security over its paper and electronic data stores, such as locks and security systems. CWY also maintains computer and network security using passwords to control and restrict access to authorised staff for approved purposes. Where information is particularly sensitive, the information is overwritten and then manually deleted.
- d) CWY will take reasonable steps to destroy or de-identify records containing personal information when that information is no longer required for CWY's functions and activities and is no longer required to be kept by law. We may need to retain records containing personal information to comply with record keeping obligations, and for other legitimate business purposes (such as quality assurance).

9. Accessing and correcting your personal information

- a) You may request to access or correct any the personal information that CWY holds about you.
- b) The procedure for making an access or correction request is as follows:
 - 1) All requests to access or correct your personal information should be addressed to the Privacy Officer, whose contact details can be found in section 12 of this policy;
 - 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) CWY will acknowledge your request within 14 days, and access will usually be granted within 14 days, or if it is more complicated, 30 days. CWY will inform you if this timeframe is not achievable;
 - 4) You will generally be asked to verify your identity. This is to ensure that we do not release your information to an unauthorised third party;
 - 5) There is no charge for making a request to access or correct your personal information. However, the Privacy Act allows us to charge an administration fee to cover our reasonable costs in retrieving and providing you with access to your information. If we intend to charge an administration fee we will give you an estimate of this fee so you can confirm whether you would still like to proceed with your request.
 - 6) Depending on the circumstances, you may be forwarded the information by mail or email, or you may be given the opportunity to personally inspect your records at the appropriate place. We will generally discuss the method of access with you beforehand, and we will seek to provide you with access in a way that is reasonable and practicable; and
 - 7) You will be given the opportunity to request corrections to any personal information which is incorrect or no longer accurate.
- c) In some circumstances, privacy laws authorise us to refuse your request to access or correct your personal information. Such circumstances include where:
 - 1) Access would create a serious threat to the life, health or safety or any individual (or to public health or public safety);
 - 2) Providing access will have an unreasonable impact upon the privacy of other individuals;
 - 3) Denying access is required or authorised by law, or providing access would be unlawful;
 - 4) The request is frivolous or vexatious;
 - 5) Legal proceedings are underway or are anticipated and the information would not be available through the process of discovery in relation to those proceedings;

- 6) Negotiations that you have with CWY may be prejudiced by such access;
 - 7) Giving access would reveal a commercially sensitive decision making process;
 - 8) Giving access would be likely to prejudice the taking of appropriate action in relation to unlawful activity or serious misconduct that CWY has reason to suspect has occurred, or to prejudice the enforcement-related activities of a law enforcement body; or
 - 9) We do not agree that the information is incorrect.
- d) If we deny your request to access or correct your personal information, we will provide you with reasons in writing.

10. Changes to this policy

CWY may change this Policy from time to time when our information handling practices change. Updates to this Policy will be published on our website.

You can find the current version of this Policy at:
<https://www.cleanaway.com.au/privacy-statement/>

11. Complaints

If you believe that your privacy has been infringed you are entitled to complain. All complaints should initially be in writing and directed to the Privacy Officer (see the contact details in Section 12 (Privacy Officer's contact details) of this Policy).

If you wish to make a complaint, provide as much detail as possible regarding the nature of the issue, the personal information involved, and the relevant Cleanaway business entity, department or person that you believe has mishandled your information. This will help us to investigate your complaint more efficiently.

We will respond to your complaint, within 14 working days, to let you know who is responsible for managing your query. We generally try to resolve all complaints within 30 working days. When this is not possible we will contact you to provide an estimate of how long it will take to handle the complaint.

If you believe CWY has not adequately dealt with your complaint, you may complain to the Privacy

Commissioner whose contact details are as follows:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
+61 2 9284 9749
www.oaic.gov.au

12. Privacy Officer's contact details

Please address all written correspondence to:

"Private and Confidential"

Attention: Privacy Officer

Cleanaway Waste Management Limited

Postal address: Level 4, 441 St Kilda Road

Melbourne VIC 3004

Email: privacy@cleanaway.com.au

Telephone: [\(03\) 8397 5100](tel:(03)83975100)

This Privacy Policy was approved by the Board on 7 June 2024.