

Palumbo understands and respects its obligation under the Privacy Act of 1988 (Privacy Act) and in accordance with the Australian Privacy Principles (APP's), to protect the privacy of the personal information it collects and acquires of individuals and will ensure that Palumbo fulfils all obligations required

This policy applies to information of a personal nature collected by Palumbo Pty Ltd.

Collection of Information

Personal Information

While conducting business, Palumbo will only collect and retain personal information provided that is reasonably necessary for or directly related to, one or more of Palumbo's functions or activities or is permitted by law. Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Palumbo may collect (but are not limited to) the following types of information:

- ▣ *Names, addresses, email addresses, phone numbers, business details and other contact details of employees, clients, contractors and contractors employees;*
- ▣ *Photos and identification documents;*
- ▣ *Health and medical information including surveillance;*
- ▣ *Credit card and other payment/ bank details;*
- ▣ *Information about an individual's employment, occupation and services rendered;*
- ▣ *Records of training or education;*
- ▣ *Video surveillance for security and safety purposes;*
- ▣ *Records of contact with an individual;*
- ▣ *Contact details of family/next of kin/emergency contacts;*
- ▣ *Collecting and recording IP addresses, date and time of your visit to our website, the pages viewed and any information downloaded.*

Sensitive Information

Palumbo will only collect and hold sensitive information if the individual consents to such collection and if it is reasonably necessary for or directly related to, one or more of Palumbo's functions or activities, or where it is required by law.

How we collect personal information

Palumbo only collects personal information in a lawful and fair manner. Personal information is usually collected from the individual or the individual's representatives. Personal information may also be collected via third parties that Palumbo or the individual engages to provide services to the individual or Palumbo related to our business relationship with the individual.

Palumbo may collect information from third parties not mentioned above, or via publicly available sources but only when it is impracticable to gain the information from the individual. Palumbo may collect information (but are not limited to) the following ways:

- ▣ *Contractor details forms;*
- ▣ *Site induction forms;*
- ▣ *Palumbo website, including information entered into and downloaded from the Palumbo Portal;*
- ▣ *Employee Personal Details Form;*
- ▣ *Training records;*
- ▣ *Contractors and clients contacting Palumbo in relation to our services or other queries;*
- ▣ *Emails, phone calls and other correspondence relating to Palumbo's services;*
- ▣ *Contractor and vendor procurement;*
- ▣ *Client information during tendering, building or expression of interest stages;*
- ▣ *Media or other public relations;*
- ▣ *Information from government agencies, industry bodies and other stakeholders and organisations relating to Palumbo's services;*
- ▣ *External events and training seminars;*
- ▣ *Employment queries and applications;*
- ▣ *General engagement with individuals in the course of conducting our business.*

Unsolicited Personal Information

Any information Palumbo obtains without unsolicited and the personal information could not of been lawfully collected under the APP's, this personal information will be destroyed or de-identified if it is lawful and reasonable to do so.

Notification of Collection of Personal Information

If Palumbo acquires any personal information from a third party as mentioned previously, we will only hold this information if it is reasonably necessary for, or directly related to a function of Palumbo.

As soon as reasonably practicable after obtaining information from a third party, or obtaining unsolicited personal information about an individual, Palumbo will notify the individual regarding the nature of the information, the reasons of collection, the use and disclosure of that information and information about this policy.

Purpose for Collecting Personal Information

Palumbo collects personal information to enable it to provide services to individuals and the individuals business and to meet all other legal obligations. Such services include:

- ❑ *Supplying, marketing or acquiring products and services;*
- ❑ *Performing administration, reporting, auditing and management functions, e.g. invoicing and account management, payment processing, risk and hazard management, training, quality assurance and managing contractors and suppliers;*
- ❑ *Gathering information relating to quotes, tenders and expression of interest;*
- ❑ *Employment related purposes, such as recruitment and providing services to staff; and*
- ❑ *Other services related to or in connection with Palumbo, including meeting legal and contractual requirements to third parties and for internal control purposes.*

Palumbo will generally tell the individual the collection purposes of the information prior to or at the time of collection of personal information.

Use and Disclosure of Personal Information

Palumbo will only use any personal information obtained for the purposes it was collected for, or related purposes, and only when the personal information is relevant to the use. Personal information may be disclosed internally within Palumbo, and to third parties engaged by the individual or Palumbo to provide services to the individual or Palumbo in relation to Palumbo's business relationship with the individual.

Third parties may include:

- ❑ *Parties engaged by Palumbo to provide products or services, or to undertake functions or activities;*
- ❑ *External advisors and auditors;*
- ❑ *Emergency services;*
- ❑ *Business partners, joint ventures, partners, associated entities, or agents;*
- ❑ *Other parties or for other purposes as agreed to by the individual, or as required or permitted by law.*

Personal information will not be used for purposes other than those described above (or related to those above) unless the individual has consented to that use or it is permitted by law.

Palumbo will not use or disclose an individual's sensitive information unless it is reasonably necessary for or related to one or more functions of Palumbo and the individual has consented to it.

Direct Marketing

As a part of Palumbo's functions and business activities and to promote the services we can provide to you, Palumbo may use personal information that you have provided to us for the purposes of direct marketing. Direct marketing includes, but is not limited to, sending to you and/or contacting you in relation to promotions and information about Palumbo's products and services. Generally, we will do so where you have expressed your interest to receive such information. You can opt out of receiving direct marketing communications by contacting Palumbo (see contact information), or by using the "opt out" link or details provided in the direct marketing communication.

Overseas Disclosure

Palumbo is not likely to disclose personal information to overseas recipients. Any overseas disclosure will comply with APP's and the Privacy Act including ensuring recipients are obliged to also comply with the APP's and Privacy Act.

Quality of Information

Palumbo will take all reasonable steps to ensure that information collected, held, use and disclose is accurate, complete and up-to-date. Individuals should advise Palumbo of any changes or corrections to the information held about the individual. An individual can contact Palumbo (see contact information) to keep Palumbo informed of any changes or corrections to information regarding the individual.

Security of Personal Information

Palumbo takes all reasonable steps to keep information protected from loss, misappropriation and unauthorised access, modification or disclosure.

When personal information that we collect is no longer required, we will take reasonable steps to destroy or permanently de-identify the personal information.

Access of Personal Information

Individuals can contact Palumbo (see contact information) to access personal information held by Palumbo about the individual. We will respond to a request in a reasonable time after the request is made. On some occasions where access may be denied under the Privacy Act, Palumbo will advise the individual why we have denied access.

Availability of Privacy Policy and Amendments

This policy is available upon request. We reserve the right to review and amend this policy and any amendments will be included on the up to date privacy policy available on Palumbo's website at www.palumbo.com.au Please review this policy for any changes. An individuals continued use of our website, products or services, requesting our assistance, or the provision of further personal information to us after this policy has been revised, constitutes the individual's acceptance of the revised policy.

Complaints

Individuals can contact Palumbo (see contact information) to complain about a breach of this Privacy policy or the APP's. Palumbo will handle complaints quickly and professionally via the Palumbo Privacy Officer.

If the complainant is not satisfied with the way Palumbo has handled the complaint, the individual can take the matter further to the Office of the Australian Privacy Commissioner.

Contact Information

For further information or any other enquires contact Palumbo during business hours at:

The Privacy Officer

Palumbo

Po Box 140, Greenwith SA 5125

Phone: (08) 8209 6100

Fax: (08) 8209 6101

Email: information@palumbo.com.au