

PRIVACY POLICY

1. PRINCIPLES AND PURPOSE

The Company respects:

- (a) the principles contained in the *Privacy Act 1988 (Cwlth)* concerning the collection, use, security and disclosure of Personal Information;
- (b) the legitimate entitlement of employees, agents, contractors, suppliers and customers in their dealings with the Group, and of invitees and licensees of Group members on Group premises, to reasonable privacy including reasonable confidentiality of Personal Information and Sensitive Information arising from their engagement in such dealings, and/or while on those premises, subject nevertheless to the commercial desire and need (as appropriate) for the Group to collect, store and maintain data and information arising from or incidental to such dealings, and to maintain appropriate security surveillance and security enforcement measures concerning those premises, in the overall interests of the Group and each of such other persons.

The Group is committed to developing, maintaining and enforcing systems, procedures and protocols to better assure privacy outcomes within the terms of this policy and any applicable legal requirements.

2. IMPLEMENTATION POLICY

Management will develop a detailed Privacy Statement for the Group which is consistent with the terms of this policy.

The Group's Privacy Statement will include (without limiting its scope):

- (a) how and when the Group will collect, use, secure and disclose Personal Information;
- (b) how a person may access and, as appropriate, correct any errors in Personal Information;
- (c) how the Group will resolve a privacy complaint;
- (d) information as to the Group's use of photographic identity and video surveillance.

3. PERSONAL INFORMATION

"Personal Information" is information or an opinion, whether true or not, and whether recorded in a material form or not, about a person whose identity is reasonably identifiable from the information or opinion. Personal Information includes Sensitive Information.

“Sensitive Information” is a form of Personal Information that includes information or an opinion about a person’s racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or practices, criminal record or health information.

4. PHOTOGRAPHS AND CCTV

The Group is committed to maintaining an appropriate degree of security concerning its operations and premises including to provide a reasonably safe and secure working environment.

This necessitates the reasonable and appropriate collection of Personal Information (including Sensitive Information as appropriate) as well as identify verification and checks and video surveillance.

5. GENERALLY

Where reasonably practicable, the Group should endeavour to:

- (a) bring to the attention of those with whom it deals its policies and procedures concerning privacy;
- (b) obtain relevant consents to the Group’s collection and dealing with Personal Information;
- (c) inform those with whom it deals of its approach to identity verification and checks.