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## Privacy Statement

This policy applies to Loscam Australia Pty Ltd (ABN 26 006 440 991) and its related bodies corporate (collectively referred to in this policy as "Loscam").

### 1. Your rights in relation to privacy

Loscam understands the importance of protecting the privacy of an individual's personal information and is committed to compliance with privacy laws. This statement sets out how Loscam aims to protect the privacy of your personal information, your rights in relation to your personal information managed by Loscam and the way Loscam collects, holds, uses and discloses your personal information.

In handling your personal information, Loscam will comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and with the 13 Australian Privacy Principles in the Privacy Act. This privacy statement may be updated from time to time.

### 2. What kinds of personal information does Loscam collect and hold?

Personal information is information that identifies you or could or an opinion about an identified, or reasonably identifiable, individual. During the provision of its services, Loscam may collect your personal information.

Generally, the kinds of personal information Loscam collects are:

#### (a) Pre-employment

- (i) Application forms – name addresses, telephone numbers;
- (ii) Resume details – which will usually include details such as an individual's name, address, telephone numbers, academic qualifications, employment history and referees;
- (iii) Reference checking;
- (iv) Pre-employment medical (with the prospective employee's consent);
- (v) Psychological and drug and alcohol testing; and
- (vi) Criminal record checks.

#### (b) Employment

- (i) Employment application forms;
- (ii) Personal details including name, address and telephone numbers;
- (iii) Emergency contact details;
- (iv) Bank account details (for payroll purposes);
- (v) Tax file number details;
- (vi) Performance reviews.

#### (c) Commercial customers

- (i) Personal details – including names, addresses, telephone numbers, job titles;
- (ii) Company details – A.B.N, Director details, contact details for senior managers;
- (iii) Financial details including banking details;
- (iv) Trade reference and credit checks;
- (v) Customer reference number and trading partner reference numbers.

**(d) Suppliers**

- (i) Personal details – including names, addresses, telephone numbers;
- (ii) Financial details including banking details.

In some circumstances Loscam may also hold other personal information provided by you.

**3. How does Loscam collect personal information?**

Generally, Loscam collects your personal information directly from you by making a record of it, through hardcopy forms or through forms provided on Loscam's internet (for external users) and intranet (for employees).

**(a) Examples of the forms completed are when:**

- (i) Opening a customer account;
- (ii) Registering for Loscam on Line;
- (iii) Registering for HMS;
- (iv) Surveys, newsletters, and focus groups;
- (v) Exchanges and discussions with you, whether in person or via telephone, email, fax or post;
- (vi) Loscam's website, including the completion of online forms, registering or subscribing to any of our services, submitting material or information or otherwise requesting further information or services.

Loscam collects personal information about its customers, or employees or officers of its customers and prospective job applicants, so that it can meet internal operational requirements, complete business transactions, deliver products and services, administer accounts, provide customer support, and meet regulatory requirements.

There may be other occasions when Loscam collects your personal information from other sources such as credit reporting agencies (in the case of customers and prospective customers) and publicly maintained records including publicly available information on social media or similar sites. Generally, Loscam will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you.

**4. What are the purposes for which we collect, hold, use and disclose your personal information?**

Loscam collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of:

- (a) providing you, or an entity with which you are connected, with returnable packaging solutions and associated services;
- (b) accounting, billing and other internal administrative purposes;
- (c) developing and facilitating a business relationship with you or an entity with which you are connected;
- (d) inviting you to events, functions or training events and providing you with updates and publications;
- (e) identifying and informing you of services that may be of interest to you.

Where personal information is used or disclosed, Loscam takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to Loscam. However, without certain information from you, Loscam may not be able to provide its products and/or services to you.

## **5. To whom does Loscam disclose your personal information?**

Loscam discloses your personal information for the purpose for which Loscam collects it. That is, generally, Loscam will only disclose your personal information if that disclosure is necessary for the purpose(s) for which that information was collected. This may include disclosing your personal information to third parties engaged to perform administrative or other business management services. This disclosure is always on a confidential basis or otherwise in accordance with law. Loscam may also disclose your personal information with your consent or if disclosure is required or authorised by law. Examples of this disclosure include:

- (a) Superannuation plan administration arrangements – Loscam provides employees' personal details to the external administrator of the superannuation plan to which the employee is a member;
- (b) Payroll arrangements – Loscam utilises a third party hosted programme to maintain its payroll data;
- (c) Video monitoring – external security advisors/contractors and Loscam managerial staff may view security tapes that have been recorded in the workplace;
- (d) Medical – Loscam may, with the employee's consent, provide the company doctor or any medical specialists retained by Loscam with employee's medical records for the purposes of their employment with Loscam;
- (e) IT arrangements – Loscam external IT providers have access to data contained within our systems. Those providers will only be provided access to personal information for the purposes for which they are contracted including software development and testing;
- (f) Third party pallet controllers - Loscam will not provide your information to third party pallet controllers unless you have authorised such access. Access to the Loscam on Line portal will be controlled by your nominated company administrator to your account. Invoices and transaction details will only be provided to email and postal addresses nominated by the customer;
- (g) Truck driver access to Loscam sites – Upon entering a Loscam site third party drivers will be required to complete an induction process. Personal information will be required to be provided, including name and address to provide subsequent evidence that an induction has been completed.

## **6. Overseas disclosure**

All data including personal and non-personal information is stored on servers located in Australia. By providing Your personal information to Loscam, You consent to Loscam storing Your personal information on servers hosted in the Australia. While Your personal information will be stored on servers located in Australia, it will remain within Loscam's effective control at all times. The server host's role is limited to providing a hosting and storage service to Loscam, and we've taken steps to ensure that our server hosts do not have access to, and use the necessary level of protection for your personal information.

Loscam may disclose personal information with its related companies overseas in order to provide necessary services and for administrative or other business management purposes. Related entities

include companies in Hong Kong, China, Thailand and New Zealand. Before disclosing any personal information to an overseas recipient, Loscam takes steps reasonable in the circumstances to ensure the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme unless you consent to the overseas disclosure or it is otherwise required or permitted by law.

## **7. Direct marketing**

Loscam may use and disclose your personal information in order to inform you of products and/or services that may be of interest to you. In the event you do not wish to receive such communications, you can opt-out by contacting Loscam via the contact details set out in paragraph 11 or through any opt-out mechanism contained in a marketing communication to you.

## **8. Security of your personal information**

Loscam takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. Loscam holds personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff.

Personal information we hold is generally stored in computer systems. These may be operated by our service providers. In all cases, we have rigorous information security requirements aimed at eliminating risks of unauthorised access to, and loss, or misuse of information. These requirements include but are not limited to:

- (a) Access control for authorised users such as user names and passwords;
- (b) Limiting access to shared network drives to authorised staff;
- (c) Virus checking; and
- (d) Specialised IT support to deal with security risks.

Loscam will destroy or de-identify personal information in circumstances where it is no longer required, unless Loscam is otherwise required or authorised by law to retain the information. Generally personal information will be destroyed after a period of 7 years following its collection or an employee's separation from the business unless it is required or may be required to be kept for longer due to the purpose for which it was originally obtained, or subsequent circumstances which require it to be held for a longer period. This includes inactive customer accounts.

## **9. Can you remain anonymous?**

The Loscam website at [www.Loscam.com](http://www.Loscam.com) can be accessed without telling us who you are or revealing any personal information, however, in such cases, our web servers may collect the name of the domain you used to access the Internet, the web site you came from, and the web site you visit next. This information may be aggregated to measure statistics about visitors to this site. We may also use this data to monitor site performance and to make the site both easier and more convenient to use.

You should be aware that Loscam may be required to disclose Your personal information without Your consent in order to comply with any court orders, subpoenas, or other legal process or investigation including by tax authorities, if such disclosure is required by law. Where possible and appropriate, we will notify You if we are required by law to disclose Your personal information.

## **10. Can you access and correct the personal information that Loscam holds about you?**

Loscam takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that is collected and held by Loscam.

If at any time you would like to access or correct the personal information that Loscam holds about you, or you would like more information on Loscam's approach to privacy, please contact Loscam via the contact details set out in paragraph 11 below.

Loscam will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- (a) you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- (b) Loscam requests that you be reasonably specific about the information you require; and
- (c) Loscam may charge you a reasonable administration fee, which reflects the cost to Loscam for providing access in accordance with your request.

Loscam may choose not to release the personal information. For example, if the information reveals commercially sensitive decisions then Loscam may choose to give you an explanation of the commercially sensitive decision rather than provide the information directly.

If Loscam refuses your request to access or correct your personal information, Loscam will provide you with written reasons for the refusal and details of complaint mechanisms. Loscam will also take steps reasonable in the circumstance to provide you with access in a manner that meets your needs and the needs of Loscam.

Loscam will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

## **11. How to contact us**

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications, please contact Loscam's Privacy Compliance Officer at:

The Privacy Compliance Officer  
Loscam Australia  
Level 1, 37-41 Prospect St  
Box Hill Victoria 3128  
+61 3 9843 3700, or  
[privacy@loscam.com.au](mailto:privacy@loscam.com.au)

## **12. Privacy complaints**

Please direct all privacy complaints to Loscam's Privacy Compliance Officer. At all times, privacy complaints will:

- (a) be treated seriously;
- (b) be dealt with promptly;
- (c) be dealt with in a confidential manner; and
- (d) not affect our existing obligations or affect the commercial arrangements between you and Loscam.

Loscam's Privacy Compliance Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Privacy Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

## **13. Updates**

This privacy policy is current at the date below. We may change it periodically. If we propose to change this policy, we will display at least 2 weeks' notice of the change on [www.loscam.com](http://www.loscam.com). Last update of this Privacy Policy: 1 Nov 2014.