



Penrite Oil Co. Pty. Ltd. Privacy Policy

Last updated June 2021

We take Privacy very seriously at Penrite Oil Co. Pty. Ltd. ("Penrite").

We collect different types of Personal Information depending on the nature of our engagement with you from several different sources including:

- directly from you
- when you use our products or services including our online services
- from outside sources and third parties.

The primary purposes for which we collect Personal Information from you is to provide you with our products and services and to best manage our relationship with you. We may also collect your Personal Information for reasons associated with these primary purposes. Rest assured, we will endeavour to only collect Personal Information by lawful and fair means.

The security of your Personal Information is very important to us and we have systems in place to protect the Personal Information we hold. We store the Personal Information we collect in both hard copy as well as electronic formats in secure storage with restricted access.

We are committed to treating the personal information we collect in accordance with the Australian Privacy Principles ("APPs") in the *Privacy Act 1988* (Cth) ("Privacy Act"). The APPs regulate the manner in which Personal Information is handled throughout its life cycle, from collection/receipt to use and disclosure, storage, accessibility and disposal.

Under the Privacy Act, and throughout this Privacy Policy ("Policy"), 'Personal Information' means information or an opinion, whether true or not, and whether recorded in a material form or not, from which your identity is apparent or can reasonably be ascertained.

This Policy sets out how we handle Personal Information. In this Policy, 'Penrite', 'we', 'us' and 'our' refers to Penrite Oil Co Pty Ltd and includes any entity carrying on business in Australia that is part of the Penrite group of entities.

We may need to update, replace or revoke this Policy from time to time to reflect our current privacy practices or changes

in the law. When we make any material changes to this Policy, we will post the updated policy on our website.

1. Scope

This Policy applies to all employees, contractors, agents, clients, customers, and suppliers of Penrite, users of our website, and all related bodies corporate of Penrite operating in Australia. It also applies to the collection of any personal or sensitive information of prospective employees, clients, and suppliers, and those individuals will also be made aware of its terms at the time of engagement.

Employees, contractors, and agents of Penrite are required to familiarise themselves with this Policy. This Policy does not form part of the contracts of engagement of employees, contractors, and/or agents with Penrite.

2. Personal Information We Collect

The types of Personal Information we collect depends on the nature of our engagement with you, whether you are or would like to become a client or supplier, or because you work for us.

Examples of Personal Information we may collect include:

- General identification information such as names, job title, occupation, date of birth and gender;
- Contact details such as name, residential address, email address, phone number, and Internet Protocol (IP) address;
- Usernames and passwords;
- Employment and/or Engagement related information;
- Pre-employment information including application forms, resume details, reference-checking, pre-employment medical report (with the prospective employee's consent) and test results (including psychological and drug testing and criminal records check);
- Credit card, bank account, tax file number, or other payment information;
- Any other Personal Information you voluntarily provide us with; and
- Voice recordings – please note all calls are recorded and monitored.

Where it is reasonable and practicable to do so, Penrite will collect Personal Information about an individual from that person directly.

The Privacy Act also protects your 'sensitive information'. Sensitive information includes information about a person's racial or ethnic origin, political opinions, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record, biometric information and templates, where that information is capable of identifying an individual or could reasonably be ascertained from that information.

Penrite will not collect sensitive information about an individual unless the information is reasonably necessary and the individual has consented, or such collection is required or authorised by law.

We destroy or de-identify your Personal Information when it is no longer necessary for its purpose and we are not required by law to keep it.

3. Collecting Personal Information

Generally, we collect your Personal Information in a number of ways including:

- From you when you provide us with this information by telephone or by completing an online enquiry through our website, application forms, customer service satisfaction surveys, contracts or any other document provided by you to us;
- From third parties such as credit reporting agencies;
- From publicly available sources of information; and
- From our own records.

Through our website we can obtain your Personal Information if you send such information in an email or when you complete an on-line enquiry. When you look at our website, we may make a record of your visit.

The following information may be logged for statistical purposes:

- Your internet protocol address;
- The date and time of your visit to our site;
- The pages that you have accessed or downloaded; and
- The type of browser you were using.

Tracking technologies such as cookies may be used on our website to recognise a user's browser each time that user visits our website. Cookies are pieces of information that a website transfers to a computer's hard disk for record keeping purposes.

Most web browsers are set to accept tracking technologies such as cookies. These tracking technologies do not purposefully identify the user. If you do not wish to receive any cookies you may set your browser to refuse them. However, your use of our website may be affected.

Please note that our website does not provide systems for secure transmission of Personal Information across the Internet except where otherwise indicated. You should be aware that there are inherent risks in transferring Personal Information over the Internet and that we accept no responsibility for Personal Information provided in unsecured websites.

4. Use and Disclosure of your Personal Information

We use your Personal Information for purposes that relate to:

- Providing you with our products;
- Managing and administering the provision of our products
- Providing quality assurance for our products;
- Communicating with you and responding to your enquiries and feedback regarding our business and products;
- Monitoring the performance of our business, employees, contractors and agents;
- Marketing, promotional, and educational activities;
- Managing and enforcing the terms and conditions of engagement with you;
- Reviewing, managing and enhancing our employee services;
- Considering and making offers of employment;
- Tracking and logging information for statistical purposes and personalising your experience;
- Developing insights used in reports or other content developed by us;
- Complying with any work health and safety requirements and other legal obligations; and
- Managing our database.

Your Personal Information may be shared between Penrite and its related entities. Normally we will not disclose your Personal Information to third parties unless:

- You have previously consented or agreed to such disclosure;
- It is necessary to provide you with the goods requested and such disclosure is made on a confidential basis;
- It is required by law or required for co-operation with any government authority (such as the Australian Taxation Office); or
- It is necessary for the purposes mentioned above or a closely related purpose that you would reasonably expect.

When we do this, we require these parties to take appropriate measures to protect that information and to restrict how they can use that information.

In some cases, we may share your Personal Information with Penrite's related body corporate in New Zealand, Penrite Oil NZ Ltd. You consent to the disclosure of your Personal Information to this entity. As such, APP 8.1 contained in Schedule 1 of the Privacy Act will not apply.

We will not sell, rent, or trade your Personal Information without your prior consent where that consent is required by law. You do however consent to our use and disclosure of your Personal Information incidental to a sale of our business to a third party or where we outsource duties including database management to an external service provider for the purpose of rendering the required services.

5. Employee Records

'Employee record' means a record of personal information relating to the employment of the employee. Examples of employee records include information about an employee contained in or recorded about: health, training, discipline or resignation of the employee, termination of the employment, terms and conditions of employment, personal and emergency contact details, employee performance or conduct, hours of employment, salary or wages, membership of a professional or trade association, trade union of membership, leave (including annual, long service, personal/carer's, maternity, paternity or other leave), taxation, banking or superannuation.

Please note that the handling of Personal Information by Penrite is exempt from the Privacy Act if the Personal Information relates directly to an employee record of a current or former employee. This means that Penrite does not need to comply with the APPs when it handles current and past employee records.

Penrite will only use Personal Information contained in an employee record for the purpose of managing the employment relationship or a purpose sufficiently related to that purpose (unless the individual concerned consents to some other use).

Where practical, Penrite will only use Personal Information contained in a record if it is accurate, complete, and up to date. In many instances, we rely upon the subject individual to provide accurate and complete information and where that individual is an employee of Penrite it is their responsibility to advise Penrite should their circumstances change over time.

6. Your Consent

You consent to your Personal Information being used in accordance with this Policy by making enquiries via telephone or by visiting our website or participating in an on-line enquiry. We will endeavour not to use or disclose your Personal Information in a way, which is unreasonably contrary to your expectations.

If you would prefer that we not use your Personal Information in any way set out in this Policy, please contact us. However, you should be aware that if you do not consent to certain uses and disclosures of your Personal Information, we may not be able to provide our products to you.

7. Access to Personal Information

You may request to access the Personal Information that we hold about you upon written request. Penrite will allow access (or partial access) unless it considers that there is a sound reason under the Privacy Act or other relevant law to withhold the information.

If your request for access is not granted, we will explain our reasons in writing to you and provide you with details of how you may make a complaint about our decision. Penrite will respond to your request in a reasonable period of time.

Any such disclosure will be made in confidence and it will be a condition of that disclosure that no Personal Information will be used or disclosed.

A nominal fee may apply to enable us to recover the reasonable costs of making such information available to you.

In the event that our business is sold, we may transfer Personal Information to the purchaser of the business. Employees will be advised of any such transfer.

Where the Personal Information is contained in an employee record, access shall be limited as prescribed by the terms of *Inspection of Records by Employees* of this Policy.

8. Correction to Personal Information

Having regard to the purpose for which Personal Information is held, Penrite shall endeavour to ensure that the information is accurate, up to date, complete, relevant, and not misleading. This shall include Penrite correcting any Personal Information which it holds or which it has disclosed to a third party either at its own initiative or at the request of an individual, providing that to do so is not unreasonable in the circumstances.

We rely upon the accuracy of your Personal Information to provide our products to you and manage our relationship with you.

To assist us with this, please contact us immediately if any of your Personal Information ceases to be current. Similarly, if for any reason you believe that the information we have about you is not accurate and complete, please contact Penrite's Accounts Department on ar@penriteoil.com or 1300 736 748 to request that certain information be corrected.

Where Penrite does not agree to amend Personal Information held about you, Penrite will provide you with reasons for its decision and details of how you may make a complaint about Penrite's decision.

9. Security of your Personal Information

We regard the security of your Personal Information as paramount. To this end, we take all reasonable steps to protect your Personal Information from loss, misuse, unauthorised access, modification, or disclosure. Personal information is stored either electronically or in hard copy and appropriate information security measures are in place to protect this information.

Only authorised people within our organisation are entitled to access your Personal Information for approved purposes.

Records of Personal Information about an individual will be stored from the later of, the date of collection or while they work for Penrite, and 7 years thereafter.

10. Inspection of Records by Employees

Employees may be granted access to view their specific Personal Information held by Penrite in certain situations. The specific information includes:

- wage and overtime records;
- leave records;
- industrial instruments regulating the employment relationship, including: contracts, letters of offer, the name of any industrial instrument (e.g. enterprise agreement or modern award);
- superannuation records and contributions made by Penrite; and
- workers' compensation records.

To make a request to inspect such records, employees are required to contact the HR Manager who will assess the request and if satisfied the request falls within one of the abovementioned categories, will make these records available.

In all other circumstances, employees do not have the right to access their Personal Information held on file by Penrite as this is an exemption under the Act.

Under no circumstance will an employee be granted access to another employees' Personal Information held by Penrite unless the access is by a manager of the employee concerned.

11. Breaches of the Policy

All known or suspected breaches of this Policy must be reported as soon as practicable to Human Resources and/or your Manager. Any failure by an employee to report a known or suspected breach may be grounds for disciplinary action.

A complaint and/or disclosure about an alleged breach of this Policy should be submitted in writing to Human Resources and/or your Manager. Any reports of a breach of this Policy will be taken seriously and be investigated by Penrite.

Once you have complained to Penrite about a concern of mishandled information, if you are not satisfied with our response/findings you may lodge a complaint with the Office of the Australian Information Commissioner ("Oaic") online, by mail, fax, or email.

For more information please visit the Oaic website at <https://www.oaic.gov.au/privacy/privacy-complaints/>

12. Changes to our Privacy Policy

From time to time, we may decide to amend, update, replace or revoke this Policy, at our absolute discretion. When this occurs, we will post the new version of the Policy on our website. We encourage you to periodically view this Policy so that you remain informed as to how we are protecting your Personal Information.

13. How to Contact Us

Should you have any queries or concerns in relation to our information handling practices, or if you wish to discuss any aspect of this policy, please do not hesitate to contact:

Hayley Hill
Group Human Resources Manager,



1300 736 748



hhill@penriteoil.com.au



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