

CORPORATE POLICIES

CP17. PRIVACY POLICY

Rondo Group of Companies (including Rondo Building Services Pty Ltd (ABN 69 000 289 207)) (**Rondo, we or us**) respects your privacy and is committed to protecting the privacy of your personal information.

Rondo collects, uses, stores, manages and discloses all personal information in accordance with this Privacy Policy and otherwise with the Australian Privacy Principles (**Australian Principles**) contained in the *Privacy Act 1988* (Cth) (**AU Privacy Act**) and, where applicable, the provisions of the *Privacy Act 2020* (New Zealand) (**NZ Privacy Act**) (each a **Privacy Act**).

In summary, 'personal information' is information that identifies an individual or information by which an individual's identity can reasonably be ascertained.

This Privacy Policy explains how Rondo collects, uses, manages and discloses personal information and how you can contact Rondo if you have queries about our management of your personal information. Any 'credit information' collected by us will be used and disclosed in accordance with our Credit Information Policy, which is available at <https://www.rondo.com.au/support/general-information/credit-reporting>.

By using Rondo's services or submitting personal information to Rondo, you accept the terms of this Privacy Policy, and consent to our use, collection, disclosure and retention of personal information as described in this Privacy Policy.

You are welcome to print or download this Privacy Policy at any time at <https://www.rondo.com.au/about/general-information/privacy-policy>

If you do not agree to any provisions in this Privacy Policy, you should not disclose any personal information to Rondo.

Why does Rondo collect personal information?

Rondo is a major manufacturer and supplier of building materials. Rondo may directly or indirectly collect personal information in the ordinary course of conducting its business and for the purposes as set out below.

What kind of personal information does Rondo collect and how does Rondo collect it?

Rondo generally collects and holds personal information about:

- Our employees;
- Contractors who provide services to Rondo;
- Our customers;
- Our suppliers;
- Job applicants; and
- Other people who may come into contact with Rondo.

The type of information we collect varies, depending on the purpose for which it is collected, and may include (but is not limited to) name, address and contact details.

Where it is reasonably practical to do so, we will collect your personal information directly from you, such as via printed or online forms and information provided in person or by telephone by the individuals themselves. However, in certain cases we may collect personal information from publicly available sources and third parties, such as suppliers, recruitment agencies, your employers, contractors, our clients, business partners, referees, government bodies (for example, for police checks, if required), academic and professional bodies (for example, to validate details and currency of qualifications).

If you enter into contracts with us, request or receive goods or services from us or have any other commercial dealings with us, we may also collect your signature, date of birth, credit card and/or banking details, credit information and billing information.

If you are an individual contractor to us or apply for a role with us, we may also collect information relevant to your engagement with us including qualifications, length of engagement, resume, current and former employment details, pay rate and salary, bank details, feedback from supervisors, training records and logs of your usage of our equipment (for example, phones, computers and vehicles).

If you attend a premises we operate or manage, we may:

- collect certain contact details that you provide to us, including the date and time of attendance, including so that we can 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
- record your image and/or voice through the use of Closed-Circuit Television (CCTV) systems for the purposes of managing security of the premises and health and safety of occupants and the public generally.

In addition to the types of personal information identified above, we may collect personal information as otherwise permitted or required by law.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services. If we provide credit to you, we will be required to collect information about you under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* and, if applicable, the *Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (New Zealand)*.

Browsing the Rondo Website

When you only browse the Rondo website at www.rondo.com.au (**Rondo Website**), Rondo's internet service provider makes a record of an individual's visit and records information such as your server address, your internet protocol address, the pages you accessed and documents downloaded, the previous site you visited, and the type of browser being used. This information assists us to analyse web traffic and improve your site navigation and application experience.

We do not identify you or your browsing activities except, in the event of an investigation, where a law enforcement agency may exercise a warrant or such other power to inspect the internet service provider's logs.

Rondo may also obtain anonymous information from the Rondo Website using a technology called "cookies". Cookies are small text files which are transferred to the hard drive of your computer to provide additional functionality to the Rondo Website and to help Rondo analyse usage of the Rondo website. Cookies can identify an individual's web browser but not an individual himself or herself. If you wish, you can disable your web browser from accepting cookies. If you disable cookies, you will still be able to access the Rondo Website but may not be able to access all of Rondo's services.

How do we use personal information?

Rondo may use the personal information you provide to us for the purposes for which it was initially collected or purposes related to such initial purpose (if such purpose would be within your reasonable expectations) and where required or authorised by law. In general, Rondo uses personal information to:

- Conduct its business;
- Provide products or services that have been requested;
- Maintain relationships with suppliers and contractors;
- Communicate with customers and third parties;
- Communicate with employees;
- Verify your identity and conduct credit checks;
- Provide ongoing information about Rondo products and services to Rondo customers;
- Provide access to Rondo's tools, resources, and services;
- Allow participation in Rondo's promotional activities;
- Contacting you (directly or through our distributors, service providers or agencies) to obtain feedback on your level of satisfaction with our products and services;
- Conduct research to better understand the marketplace and to help develop our products and services; and
- Facilitate the sale, transfer, merger, or divestiture of all or a portion of our business or assets.
- Comply with legal obligations and for purposes authorised by laws or regulations, such as to prevent or investigate alleged crime or fraud.

Direct Marketing

We may provide you with information and advertisements about products, services 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.

Such marketing messages may be sent by electronic messaging (such as email and SMS), by telephone or by post. If you would like us to stop sending you direct marketing communications, you can choose to opt out by contacting us using the contact information provided below, or by utilising an 'unsubscribe' facility on a communication we send to you in which case we will take steps to ensure you do not receive any such direct marketing information in future.

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.

To whom may we disclose personal information?

We may disclose your personal information to third parties where you have consented, where disclosure is necessary to achieve the purpose for which it was submitted (as outlined above) and where permitted by the applicable Privacy Act(s). Depending on the product or service concerned, personal information may be disclosed to:

- Rondo's shareholder companies, CSR and Knauf and any related or associated companies;
- Service providers and specialist advisers to Rondo who have been contracted to provide Rondo with administrative or other services, for example, distributors, delivery services, financial service providers, technology service providers and market research agencies;
- Courts, tribunals, regulatory authorities and law enforcement agencies as agreed or authorised by law or where required to do so by a court or under applicable laws or regulations or where requested by a government agency;
- Insurers, credit providers, credit reporting or reference agencies or insurance investigators (in accordance with our Credit Information Policy); or
- A person authorised by you to receive your personal information; and
- Organisations that may be involved in any transfer or sale of all or part of our assets or business or involved in any of our risk management or funding requirements.

Generally, we require that organisations outside Rondo who handle or obtain personal information as service providers to Rondo acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the applicable Privacy Act(s) and this Privacy Policy. However, as such organisations are not within Rondo's control, we do not accept responsibility for the conduct of such organisations, including in their dealings with personal information.

In most cases, if you do not provide information about yourself that Rondo has requested, Rondo may not be able to provide you with the relevant product or service.

How do we treat sensitive information?

'Sensitive information' includes personal information about an individual's racial or ethnic origin; religion; membership of political bodies, trade unions or other professional or trade associations; sexual preferences; criminal record; or health information.

Rondo generally does not collect sensitive information. However, in the event it does so, Rondo will only use and disclose sensitive information for the purpose for which it was provided or another directly related purpose, unless you agreed otherwise, or unless use or disclosure of this information is allowed by law.

The way we use tax file numbers and information received from a credit reporting agency about an individual is also restricted by law and governed by our Credit Information Policy.

Trans border disclosure

Personal information may be stored, disclosed, processed in or transferred outside of the jurisdiction where you are located from time to time. In the ordinary course of business we commonly disclose personal information to recipients located in Australia, New Zealand and Pacific Island countries including Papua New Guinea. It is possible that such third parties may not be subject to laws that provide the same level of protection of personal information as prescribed in the applicable Privacy Act(s). Any disclosure of your personal information to third parties located overseas will be made in accordance with the applicable Privacy Act(s).

You acknowledge and agree to such international data and information transfers with respect to personal information.

Individuals in Australia

Clause 8.1 of the Australian Principles contained in Schedule 1 of the AU Privacy Act provides that if we disclose personal information about an individual to an overseas recipient, then we must take such steps as are reasonable in the circumstances to ensure the overseas recipient does not breach the Australian Principles in relation to such information.

An exception to this is if we obtain your consent. We intend to rely on this exception in the following way. Unless you notify us in writing to the contrary, you will be taken to have consented to the disclosure by us of personal information to overseas recipients on the basis that:

- clause 8.1 of the Australian Principles will not apply to such disclosure;
- the individual whose personal information is disclosed will not be able to seek redress under the Privacy Act;
- the overseas recipient may not be subject to any privacy obligations or to any principles similar to the Australian Principles;
- the individual may not be able to seek redress in the overseas jurisdiction; and
- the overseas recipient is subject to a foreign law that could compel the disclosure of personal information to a third party, such as an overseas authority.

How do we manage personal information?

Rondo trains its employees who handle personal information to respect the confidentiality of that information and the privacy of individuals and to ensure ongoing compliance with the Australian Principles and this Privacy Policy.

How do we store personal information?

Rondo is required by the applicable Privacy Act(s) to safeguard the security and privacy of your personal information, whether you interact with us personally, by telephone, mail, over the internet or other electronic medium.

This includes an obligation to take reasonable steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

Rondo maintains sophisticated I.T. systems to keep its records on master files and has security measures designed to protect against the loss, misuse and/or the unauthorised alteration of the information under its control.

However, since no system is 100% secure or error-free, we cannot guarantee that your personal information is totally protected, for example, from hackers or misuse.

If you enter personal information on the Rondo website, you should exercise due care to safeguard any passwords and usernames created by you to access your personal information on the Rondo website.

The Australian Principles also require Rondo not to store personal information longer than necessary. Where Rondo no longer requires any personal information that we hold, we will take reasonable steps to destroy that personal information or remove details which may identify individuals.

How do we keep personal information accurate and up-to-date and how may you amend personal information you provide to Rondo?

Rondo seeks to ensure that the personal information it holds is accurate and up-to-date.

We realise that this information changes frequently with changes of address and other personal circumstances. We encourage you to contact Rondo as soon as possible in order to update any personal information we hold about you. Rondo contact details are set out below.

Rondo will be happy to accept updated personal information in writing from the owner of that information at any time. However, in order to protect your privacy and security, we will take reasonable steps to verify your identity before granting you access or enabling you to make corrections of your personal information.

Can you check what personal information about you is held by us?

You may obtain access to any personal information which Rondo holds about you, unless we are required or permitted under the applicable Privacy Act(s) and/or applicable law to refuse to provide you with such access.

To make a request to access information Rondo holds about you, please contact Rondo in writing. Rondo will require you to verify your identity and to specify what information you require. If we decide to refuse your request for access to your personal information, we will provide you with the reason(s) for our refusal to the extent required by applicable law.

To the extent not prohibited by applicable law, Rondo may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested.

Rondo will respond to any request to access or amend personal information within a reasonable timeframe and in accordance with any obligations it has under the applicable Privacy Act.

What if you have a complaint?

If you consider that any action of Rondo breaches this privacy policy or the applicable Privacy Act(s), you can make a complaint. In the first instance, please direct your complaint to the particular Rondo Branch concerned – they are likely to be in the best position to deal with the matter quickly and effectively. Each Rondo branch has an officer appointed to handle complaints. Please refer to the details in the "**How do you contact us?**" section below.

If the particular Rondo branch is unable to deal with a privacy complaint to your satisfaction, please contact the Human Resources by email, phone, facsimile or post. Rondo endeavours to respond promptly to complaints and will try to resolve complaints within 30 days of notification.

If you believe we have not adequately dealt with your complaint, you may complain to the applicable Commissioner:

- Office of the Australian Information Commissioner, whose contact details are found on the website <http://www.oaic.gov.au/>.
- Office of the New Zealand Privacy Commissioner, whose contact details are found on the website <https://www.privacy.org.nz/>.

Employees

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.

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 vehicles) on a continuous and ongoing basis using various technologies, including monitoring: email, internet and network use.

We may also collect and use biometric information and templates (such as fingerprints) in order to:

- provide secure access to our premises/equipment; and/or
- utilise time sheet or attendance monitoring technologies.

Under the applicable Privacy Act(s), 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.

How do you contact us?

1 Human Resource Rondo Building Services Pty Ltd P O Box 324 St. Marys NSW 1790	Tel: 02-99127392 Fax: 02-99127361 Email: HR@rondo.com.au
2 Rondo Building Services Pty Ltd 1 Columbia Court Dandenong South VIC 3175 Tel: 03-85612222 Fax: 03-85612266 Email: Office.VIC@rondo.com.au	3 Rondo Building Services Pty Ltd Lot 512, Binary Street Yatala QLD 4207 Tel: 07-32874944 Fax: 07-32871881 Email: Office.QLD@rondo.com.au
4 Rondo Building Services Pty Ltd 39 George Street Greenfields SA 5107 Tel: 08-82605566 Fax: 08-83495449 Email: Office.SA@rondo.com.au	5 Rondo Building Services Pty Ltd 15 Glassford Road Kewdale WA 6105 Tel: 08-92519400 Fax: 08-92519414 Email: Office.WA@rondo.com.au
6 Rondo Building Services Pty Ltd Building C1, 373 Neilson Street Penrose Auckland 1061 NZ Tel: +64-9-6365110 Fax: +64-9-6365111 Email: Rondo.NewZealand@rondo.co.nz	7 Rondo Building Services Pty Ltd 57-87 Lockwood Road, Erskine Park NSW 2759 Tel: 1300 137742 Fax: 1300 137743 Email: Office.NSW@rondo.com.au

Updates to this Policy

This Privacy Policy will be reviewed from time to time to take account of new laws and technology changes to our operations and practices and the changing business environment.

All personal information held by Rondo will be governed by Rondo's most recent policy. Changes to this Privacy Policy will be published by posting an updated Privacy Policy on the Rondo website.

Therefore, you should review Rondo's Privacy Policy regularly to ensure you are familiar with any changes. If you are unsure whether you are reading the most current version, please contact us.

Your continued use of the Rondo Website or Rondo's services after any changes to this Privacy Policy are posted will be taken as acceptance of those changes.



.....

Gareth Hirst
EXECUTIVE GENERAL MANAGER