



Australian Paper

a member of the Nippon Paper Group

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Australian Paper's Privacy Policy

The Board of Directors of Paper Australia Pty Ltd (ABN 63 061 583 533) may vary this policy at any time. Any reference to this policy in contracts of employment refers to this policy as varied from time to time.

1. Introduction

Paper Australia Pty Ltd (ABN 63 061 583 533) and its subsidiaries (**Australian Paper**) are committed to complying with the privacy laws of Australia as set out in the *Privacy Act 1988* (Cth) (**the Act**), which contains the Australian Privacy Principles (**APPs**), and any relevant privacy codes.

This policy outlines the circumstances surrounding the management of personal information in accordance with Australian privacy laws. This policy applies to all Australian Paper's dealings with individuals, including employees (past and present) and prospective employees of Australian Paper. This policy does not form part of any employee's contract of employment.

2. What is personal information?

In this Privacy Policy:

- **'personal information'** means any information or an opinion about an identified individual, or an individual who is reasonably identifiable, regardless of whether the information or opinion is true or not or is recorded in a material form or not (i.e. digitally or in hard copy); and
- **'sensitive information'** means a category of personal information and includes information or an opinion about a person's health, race or ethnic origin, political or religious beliefs, membership of a trade union or association, criminal record, sexual orientation and genetic and 'biometric' information.

3. What personal information do we collect?

The kinds of personal information we collect depends on the circumstances in which the information is collected.

We may collect:

- information that identifies you (for example, name, address, contact details);
- information about your financial position (creditworthiness);
- information about you that is required or authorised by law;

- where you are an employee or prospective employee or contractor, your date of birth, tax file number, employment history, references, educational qualifications, dependants, driver's licence, passport details, residency or visa status etc; and
- your opinion about our products, services or staff.

4. How do we collect your personal information?

Whenever it is reasonable and practical to do so, we will only collect personal information directly from you.

We will take reasonable steps to inform you before, or at the time we collect personal information or, if this is not practicable, as soon as practicable after collection, that we have obtained your personal information, unless it is obvious from the circumstances of the collection (for example, exchanging business cards at a trade function).

We may collect personal information from:

- purchasers or potential purchasers of our products (for example, in the ordinary course of dealings, in relation to credit applications and sales and marketing activities);
- our suppliers, including individual contractors (for example, when establishing records and systems to enable payment for goods or services);
- job applicants (for the purposes of potential employment); and
- other individuals who may come into contact with Australian Paper.

Credit Information

We may obtain information that has a bearing on:

- your eligibility to be provided with credit;
- your history in relation to credit; or
- your capacity to repay credit,

(all, 'credit information') directly from you or from a Credit Reporting Body in connection with an application for commercial credit or provision of a guarantee relating to such an application.

We will only do so where you have consented to the disclosure of that information.

Where we obtain such credit information, we will only use that information for credit guarantee purposes; or internal management purposes directly related to the provision or management of any credit by us or for debt collection purposes.

We will take such steps (if any) as are reasonable in the circumstances to ensure that the credit information we collect is accurate, up-to-date and complete. When we no longer need it for the purpose for which it was collected, we will take such steps as are reasonable in the circumstances to destroy the information or to ensure that the information is de-identified.

Your rights to access that information are set out below. Otherwise, the provisions of this policy as they relate to personal information will generally also apply to credit information.

5. Why do we collect, use and disclose your information?

The purposes for which we use and disclose your personal information will depend on the circumstances in which we collect it. Whenever practical we endeavour to inform you why we are

collecting your personal information, how we intend to use that information and to whom we intend to disclose it at the time we collect your personal information.

We may use or disclose your information:

- for the purposes for which we collected it (and related purposes which would be reasonably expected by you);
- for other purposes to which you have consented; and
- as otherwise authorised or required by law.

In general, we collect, use and disclose your personal information so that we can do business together and for purposes connected with our business operations.

Some of these specific purposes are:

- to provide goods or services to you or to receive goods or services from you;
- to communicate with you;
- if you are a customer, to assess your creditworthiness;
- to administer surveys, competitions or other promotional activities or events conducted, sponsored or managed by us or our business partners;
- to verify your identity, address and age or eligibility to participate in a marketing activity such as a competition or promotion;
- to consider you for a job with us (whether as an employee or contractor) or in the context of other relationships with us;
- to comply with regulatory and legal obligations;
- to address any issues or complaints that we or you have regarding our relationship; and
- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

6. Direct Marketing

We will not use personal information for the purpose of direct marketing without your express or inferred consent and only where we have provided a simple means by which you may easily request not to receive direct marketing communications from us and you have not made such a request. Note that the *Spam Act 2003* and *Do Not Call Register Act 2006* continue to apply.

7. What happens if you don't provide personal information?

To the extent practicable, we will provide you with the option of not identifying yourself or of using a pseudonym when dealing with us. In the case of unsolicited information, this will generally be destroyed or de-identified unless we could have validly solicited the information and kept it. We will not adopt or use a government related identifier (eg. TFN, Medicare number) of an individual unless we are permitted to do so by law.

8. Who do we disclose personal information to?

We may disclose your personal information to third parties in connection with the purposes described in section 5 of this Privacy Policy.

This may include disclosing your personal information to the following types of third parties:

- our employees, business partners and related bodies corporate;
- our contractors and other third parties that provide goods and services to us (including website and data hosting providers, and other suppliers);
- our accountants, insurers, lawyers, auditors and other professional advisers and agents;
- payment system operators;
- if you are an individual contractor to us or a prospective employee, to our related companies and HR related service providers (e.g. for outsourced payroll processing);
- any third parties to whom you have directed or permitted us to disclose your personal information (e.g. referees);
- in the unlikely event that we, or our assets, may be acquired or considered for acquisition by a third party, that third party and its advisors;
- third parties that require the information for law enforcement or to prevent a serious threat to public safety; and
- otherwise as permitted or required by law.

Where we disclose your personal information to third parties we will use reasonable commercial efforts to ensure that such third parties only use your personal information as reasonably required for the purpose we disclosed it to them and in a manner consistent with the Privacy Principles under the Privacy Act.

9. Does personal information leave Australia?

We may disclose personal information to overseas recipients in a number of countries, including, New Zealand, Japan, Netherlands, France, the United Kingdom and the United States of America for the purposes of:

- data storage, security and processing;
- personnel management; and
- reporting.

We will take such steps as are reasonable to ensure that overseas recipients of your personal information comply with the APPs in relation to that information.

Where that is not the case, we will expressly advise you, if you consent to the disclosure of your personal information to an overseas recipient, it may not be covered by the APPs. Such advice will be made before we obtain any such consent and, if consent is not given, disclosure will not be made to that overseas recipient unless we are otherwise permitted to do so on other grounds as set out in APPs.

If you consent to disclosure to an overseas recipient and they handle your personal information in breach of the APPs:

- we will not be accountable under the Act; and
- you will not be able to seek redress under the Act.

You should be aware that the overseas recipient may be subject to a foreign law that could compel the disclosure of your personal information to a third party, such as an overseas authority.

10. How do we store and secure personal information

We store personal information on computer databases and/or in hard copy and will take reasonable commercial physical and electronic security measures to protect any records that we hold which contain your personal information. We will de-identify personal information in a secure manner when we no longer need it.

However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information. Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the *Competition and Consumer Act 2010* (Cth).

Please notify us immediately if you become aware of any breach of security.

11. Accuracy of personal information we hold

We try to maintain your personal information as accurately as reasonably possible.

We encourage you to contact us if the personal information we hold about you is incorrect or to notify us of a change in your personal information. Our contact details are set out in section 13 of this Privacy Policy.

12. How can you access and correct personal information we hold about you?

If you request access to your personal information that we hold about you, or request that we change that personal information, we will respond within a reasonable period of time and, if it is reasonable and practicable to do so, allow access unless we consider that there is a sound reason under the Act or other relevant law to withhold the information.

If we are satisfied that the personal information is incorrect, we will take such steps as are reasonable to correct that information. If we refuse to correct your personal information, we will explain our decision to you and advise you of mechanisms available for you to complain about our refusal.

13. How can you contact us?

If you have any queries about this policy, wish to request access to (or correction of) your personal information, or wish to make a complaint, please contact Australian Paper's Privacy Officer at:

Australian Paper

307 Ferntree Gully Road

Mount Waverley, VIC 3149

Email: privacyofficer@australianpaper.com.au

When contacting us please provide as much detail as possible in relation to your question, comment or complaint.

We will take any privacy complaint seriously and any complaint will be assessed with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

If you are not satisfied with the outcome of our assessment of your complaint, you may wish to contact the Office of the Australian Information Commissioner.