

Privacy Policy

1. Background

1.1 General

This Privacy Policy applies to Ceechem and its related bodies corporate as defined in the *Corporations Act* (Cth). Ceechem (**Ceechem, we, us, our**) is a chemical supply company with head office located in Australia and a satellite operation in New Zealand.

In this privacy policy “**you**” refers to any individual about whom we collect personal information.

We are committed to protecting your privacy, in accordance with applicable Australian and New Zealand privacy laws.

This policy (**Privacy Policy**) is designed to give you a greater understanding of how we collect, use, disclose and otherwise handle personal information.

A copy of this Privacy Policy can be found on our shared drive under HR>Policies.

1.2 What is personal information?

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable. Examples include your name, address, date of birth and email address.

1.3 Our obligations

We comply with the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**) and in consideration of the New Zealand Privacy Act 1993. The Australian APPs regulate the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, security, accessibility and disposal.

The Privacy Act also includes a data breach notification regime, which requires Ceechem to address data breaches involving personal information held by Ceechem.

We are also required to comply with more specific privacy legislation in some circumstances, such as:

- applicable State and Territory health privacy legislation (including the Victorian *Health Records Act*) when we collect and handle health information in the relevant jurisdiction; and
- the *Spam Act* and the *Do Not Call Register Act*.

1.4 Employee records

We are generally exempt from the Privacy Act when we collect and handle employee records and this Privacy Policy does not apply to that information. However, where State or Territory health privacy legislation applies, we are still required to protect the privacy of employee health information. This Privacy Policy will apply in those circumstances.

2. What we collect

2.1 General

The type of personal information that we collect about you depends on the type of dealings you have with us. For example, if you:

- **send us an enquiry or provide us with feedback**, we may collect your name, contact details, details of your enquiry or feedback and information about our response.
- **apply for a job with us**, we will collect the information you include in your job application, including your cover letter, resume, contact details, academic records, qualifications, memberships, licences and referee reports.
- **are a supplier to us**, we may collect your name and/or your company/business name and contact details.
- **ask us to send you information about products and/or services**, we will collect your name, email address, location, contact details, details of the product and/or service you are interested in and how you heard about us.

2.2 Sensitive information

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection, such as health information. We only collect sensitive information where it is reasonably necessary for our functions or activities and either:

- the individual has consented; or
- we are required or authorised by or under law (including applicable privacy legislation) to do so.

For example, we may collect health information, information about racial or ethnic origin, membership of a professional or trade association or trade union, criminal record and some types of biometric information.

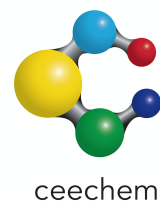
2.3 Collection of information other than personal information through our website.

When you visit our website, some of the information that is collected about your visit is not personal information, as it does not reveal your identity. The website may record the regional location and type of device you are using, but this information is general in nature and does not pertain to any specific physical address or serial number.

2.3.1 Website visit information

For example, we record your server address, the date and time of your visit, the pages you visited, any documents you downloaded, the previous site you visited and the type of device, browser and operating system you used.

We use and disclose this information in anonymous, aggregated form only, for purposes including statistical analysis and to assist us to improve the functionality and usability of our website. You are not individually identified, however we reserve the right to use or disclose this information to try to locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our website, or where we are otherwise required or authorised by law to do so.



2.3.2 Cookies

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies we use do not identify individual users, although they do identify the user's internet browser and type of device used.

We use cookies to hold anonymous session information. This information is used to personalise your current visit to the website, for example to allow the website to remember who you are by keeping server variables linked to your session.

We only use non-persistent cookies. That is, they are held on your browser's memory only for the duration of your session.

Most internet browsers are set to accept cookies. If you prefer not to receive them, you can adjust your internet browser to reject cookies, or to notify you when they are being used. There are also software products available that can manage cookies for you. Rejecting cookies can, however, limit the functionality of our website.

2.3.3 Online Behavioural Advertising

We use advertising programs that place cookies on your computer to collect information about your browsing history (including on external websites). This information, which does not identify you personally, is collected in order to improve your online experience by customising the advertising you see to your interests (including the display of more relevant ads on external websites).

3. How we collect personal information

3.1 Methods of collection

We collect personal information in a number of ways, including:

- directly from you in person (for example, when you visit our business premises or engage with Ceechem staff at an external event)
- through our website (for example, when you contact us or by making an online enquiry)
- through our social media pages (for example, through Instagram, LinkedIn or our Facebook page)
- over the telephone
- through any written correspondence (such as letters and emails)
- on hard copy forms

3.2 Unsolicited information

Unsolicited personal information is personal information we receive that we have taken no active steps to collect (such as an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement).

We may keep records of unsolicited personal information if the Privacy Act permits it (for example, if the information is reasonably necessary for one or more of our functions or activities). If not, we will destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

4. Why we collect personal information

The main purposes for which we collect, hold, use and disclose personal information are set out below:

- to provide and improve our products and services
- answering queries and resolving complaints
- recruiting staff and contractors
- to update our records
- to help us better understand your needs including by sending information to you which we think may be of interest to you by post, email, or other means
- to send you communications relating to our business
- promoting ourselves and our products and services, including direct marketing and events
- performing research and statistical analysis for continuous improvement

We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or:

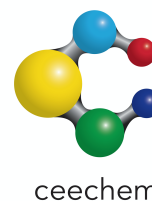
- which are required or authorised by or under law (including, without limitation, privacy legislation); and
- for which you have provided your consent.

5. Who we may share your personal information with

Ceechem may disclose your personal information, and you consent to Ceechem disclosing your personal information, to Ceechem's related bodies corporate and associated entities (as those terms are defined in the *Corporations Act 2001* (Cth)).

Ceechem may also share your personal information, and you consent to Ceechem disclosing your personal information, with third parties where appropriate for the purposes set out under heading 4, including:

- financial institutions for payment processing
- our related bodies corporate
- regulatory, investigative or government bodies where required or authorised by law
- an individual's agent or authorised representative
- financiers and prospective financiers
- referees whose details are provided to us by job applicants
- third parties who support our information technology
- our contracted service providers
- our professional advisers



In each case, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant services.

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6. Cross border disclosure of personal information

We do not currently disclose personal information to third parties located overseas. If this changes at some time in the future, we will comply with the requirements of the Privacy Act that apply to cross border disclosures of personal information and this Privacy Policy will be amended accordingly.

7. Use of government related identifiers

We will not:

- use a government related identifier of an individual (such as a Medicare number or driver's licence number) as our own identifier of individuals; or
- otherwise use or disclose such a government related identifier,

unless this is permitted by the Privacy Act (for example, use of an identifier to verify an individual's identity or uses or disclosures required or authorised by or under an Australian law).

8. Data quality and security

8.1 General

We hold personal information in a number of ways, including in hard copy documents, electronic databases/software applications, and in paper files held in head office drawers and cabinets. We take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant;
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the APPs.

You can help us keep your information up to date, by letting us know about any changes to your details, such as your address, email address or phone number.

8.2 Security

The steps we take to secure the personal information we hold include website protection measures (such as firewalls and anti-virus software), security restrictions on access to our computer systems (such as login and password protection), controlled access to our corporate premises, personnel security (including restricting access to personal information on our systems to staff who need that access to carry out their duties), staff training and workplace policies.

8.2.1 IP Address

An IP (internet protocol) address is a number that is automatically assigned to your computer by your internet service provider when you log on. Your IP address is not linked to your personal information, but we do preserve the right to use IP addresses to identify individuals who may threaten our site, services or clients. IP addresses may also be used to help diagnose problems with our website and to gather broad demographic information.

8.2.2 Third party websites

Links to third party websites (including those of our customer's) that are not operated or controlled by us are provided for your convenience. We are not responsible for the privacy or security practices of those websites, which are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

8.3 Notifiable Data Breaches

We will comply with the requirements of Part IIIC of the Privacy Act in relation to notifying you of eligible data breaches.

9. Access and Correction

9.1 General

Please contact our Privacy Officer (details under heading 11 below) if you would like to access or correct the personal information that we hold about you. We may require you to verify your identity before processing any access or correction requests, to make sure that the personal information we hold is properly protected.

9.2 Access

We will generally provide you with access to your personal information, subject to some exceptions permitted by law. We will also generally provide access in the manner that you have requested (eg. by providing photocopies or allowing a file to be viewed), provided it is reasonable and practicable for us to do so.

9.3 Correction

If you ask us to update personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If we update personal information about you, and we have previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask us to notify that other entity. If so, we will take reasonable steps to do so, unless this would be impracticable or unlawful.

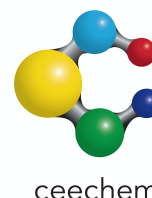
9.4 Timeframe for access and correction requests

Except in the case of more complicated requests, we will endeavour to respond by written notice to access and correction requests within 30 days.

9.5 What if we do not agree to your request for access or correction?

If we do not agree to your access or correction request, or if we do not agree to give you access in the manner you requested, we will provide you with a written notice setting out:

- the reasons for our decision (except to the extent that, having regard to the grounds for refusal, it would be unreasonable to do so); and
- available complaint mechanisms.



In addition, if we refuse to correct personal information in the manner you have requested, you may ask us to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, and we will take reasonable steps to do this in such a way that will make the statement apparent to users of the information.

10. Complaints

If you have a complaint about how we have collected or handled your personal information, please contact our Privacy Officer (details under heading 11 below).

10.1 Complaints process

Our Privacy Officer will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter within a week. If your complaint can't be resolved at the first instance, we will ask you to submit your complaint in writing.

We will endeavour to acknowledge receipt of your written complaint within 5 business days of receiving it and to complete our investigation into your complaint in a timely manner. This may include, for example, gathering the relevant facts, locating and reviewing relevant documents and speaking to relevant individuals.

In most cases, we expect that complaints will be investigated, and a response provided within 30 days of receipt of the complaint. If the matter is more complex and our investigation may take longer, we will write and let you know, and tell you when we expect to provide our response.

10.2 If you are not satisfied with our response

If you are not satisfied with our response, you can refer your complaint to the Office of the Australian Information Commissioner (see [here](#) for further information).

11. Our contact details

Please contact us if you have any queries about the personal information that we hold about you or the way we handle that personal information. Our contact details are set out below.

Mail: Ceechem Australia Pty Ltd, Unit 25, 328 Reserve Rd, Cheltenham VIC. 3192

Email: sally.buckingham@ceechem.com.au

Telephone: 0403 799 162

Further general information about privacy is available on the website of the Office of the Australian Information Commissioner at www.oaic.gov.au or by calling the OAIC's enquiry line at 1300 363 992.

12. Changes to this Policy

We may amend this Privacy Policy from time to time. The current version will be distributed, and a copy may be obtained by contacting our Privacy Officer (details above). All amended terms will automatically take effect immediately on distribution.