

PRIVACY POLICY

Introduction

SICE NZ Limited NZBN:9429030898240 (SICE, we, us, our) is committed to complying with applicable privacy laws in relation to the personal information that we collect in the course of running our business. Our contact details are in section 12. Where applicable privacy laws provide for exceptions or exemptions, we may rely on those exceptions or exemptions in our information handling practices.

Please take a moment to read our Privacy Policy as it explains how we manage personal information including our obligations and your rights in respect of our dealings with your personal information.

This Privacy Policy (other than section 10) explains how we manage personal information about individuals other than employees. Section 10 explains the position of employees.

Key definitions

In this document:

- "IPPs" means the Information Privacy Principles set out in the Privacy Act;
- "personal information" has the meaning set out in the Privacy Act, and (in summary) means information about an identifiable individual; and
- "Privacy Act" means the *Privacy Act 1993* and the *Privacy Act 2020* which will apply on and from 1 December 2020;

1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- when you make an inquiry or order in relation to goods or services, including through our website located at <https://www.sice.com/en> (the **Website**);
- in administering and performing any contracts with service providers;
- when you contact us via telephone or other means;
- from correspondence (whether in writing or electronically);
- when you upload content to or interact (in an identifiable manner) with our Website or our social media pages;

- through any mobile applications provided by our organisation;
- through our recruitment processes;
- while conducting customer satisfaction and market research surveys;
- if you attend any of our premises, we may record certain contact details so that we can comply with applicable laws, and we may also record your image and/or voice if we have surveillance systems operating at those premises;
- when administering any of our services; and
- as otherwise required to manage our business.

In certain cases, we may collect personal information from publically available sources and third parties, such as suppliers, recruitment agencies, your employers, contractors, our clients, and business partners. By using our services, you consent to such collection.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

2. Types of personal information we collect

The type of personal information we collect about you depends on the circumstances in which the information is collected. The type of personal information we may collect can include (but is not limited to) your name, postal address, email address, phone numbers, date of birth, drivers licence, and billing information.

If you are an individual contractor to 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 (e.g. phones, computers and vehicles).

If we have or in the future make available any mobile applications for you to download and use, we may:

- record details of your device details and operating systems; and
- if you have provided us with permission to access your device location when using our app, we may collect information about your geographical location.

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.

3. Our purposes for handling your personal information

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances. 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 personal information:

- for the purposes for which we collected it (and directly related purposes);
- for other purposes which you have authorised; 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 the specific purposes for which we collect, hold, use and disclose personal information are as follows:

- to operate the Website
- where you have provided us with access to your geographical location via any of our mobile applications, we may send you push notifications and other electronic communications (including SMS) for purposes including to optimise communications with you, and for our compliance and marketing activities;
- to offer and provide any other goods or services to you or to receive goods or services from you;
- to provide you with tax invoices for our goods and services;
- to confirm your identity;
- to facilitate your entry and participation in a competition or trade promotion;
- to consider you for a job (whether as an employee or contractor) or other relationships with us;
- to optimise and customise the user experience (including content and advertising) for users of the Website and our other websites, mobile applications and services;
- to protect the security and integrity of the Website and our other websites, mobile applications and services;
- to develop and improve our Website and our goods and services;
- to contact you (directly or through our service providers and marketing research agencies) to obtain your feedback and to find out your level of satisfaction with our goods and services;
- to comply with our legal and regulatory 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.

4. Third parties to whom we disclose your personal information

We may disclose your personal information to third parties in connection with the purposes described in section **Error! Reference source not found.** of this Privacy Policy. This may include disclosing your personal information to the following types of third parties:

- our suppliers, contractors and organisations that provide us with technical and support services;
- our related entities (who may use and disclose the information in the same manner we can);
- our accountants, insurers, lawyers, auditors and other professional advisers;
- any third parties to whom you have directed or permitted us to disclose your personal information (e.g. referees); and
- 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.

We may also disclose your personal information in accordance with any consent you give or where disclosure is authorised, compelled or permitted by law.

If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

If you post information to certain public parts of our Website or to our social media pages, you acknowledge that such information may be available to be viewed by the public. You should use discretion in deciding what information you upload to such sites.

5. Protection of personal information

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas. We use a range of security measures to protect the personal information we hold, including by implementing IT security tools to protect our electronic databases.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

6. Direct marketing

Like most businesses, marketing is important to our continued success. We therefore like to stay in touch with customers and let them know about new offers and opportunities. We may provide you with

information about products, services and promotions either from us, or from third parties which may be of interest to you, where:

- you have consented to us doing so; or
- it is otherwise permitted by law.

You may opt out at any time if you no longer wish to receive direct marketing messages from us. You can make this request by contacting our Marketing Officer at anzsicecorpcom@sice.com.au.

7. Cookies

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

We may use third party vendors to show our ads on sites on the Internet and serve these ads based on a user's prior visits to our Website. We may also use analytics data supplied by these vendors to inform and optimise our ad campaigns based on your prior visits to our Website.

8. Accessing and correcting your personal information

You may contact us (see contact details in section **Error! Reference source not found.**) to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to the personal information we hold about you.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time or the statutory timeframes (if any).

9. Overseas transfers of personal information

Some of the third parties to whom we disclose personal information may be located outside New Zealand. The countries in which such third party recipients are located depend on the circumstances. In the ordinary course of business we commonly disclose personal information to recipients located in Australia, the United Kingdom, Spain and the United States of America.

From time to time we may also engage an overseas recipient to provide services to us, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider.

By providing your personal information to us, you consent to us disclosing your personal information to any such overseas recipients for purposes necessary or useful in the course of operating our business. For the avoidance of doubt, it is possible that the overseas recipients may not be required to protect the information in a way that, overall, provides comparable safeguards to those in the Privacy Act. However, where possible, we try to enter into agreements with the overseas recipients to ensure comparable safeguards.

10. Employees

We collect information in relation to employees as part of their application for employment and during the course of their employment, either from them or in some cases from third parties such as recruitment agencies. Such information may include (but is not limited to) contact details, qualifications, 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 (e.g. phones, computers and vehicles), emergency contact details, visa details (to ensure that a prospective or current employee has the right to work in New Zealand), and passport details (if an employee is required to make overseas trips).

Under the Privacy Act, 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.

11. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact us (see contact details in section **Error! Reference source not found.**).

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

We take all complaints seriously, and will respond to your complaint within a reasonable period. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

If you are dissatisfied with the handling of your complaint, you may contact the New Zealand Privacy Commissioner:

Email: investigations@privacy.org.nz

Telephone: 0800 803909

12. Our Contact details

Contact details for the entity collecting and holding your personal information and for privacy related issues or concerns are as follows:

Postal address: Level 6, 163 O’Riordan Street, Mascot NSW 2020

Email: anzsiceinfocompliance@sice.com.au

13. Links

Our Website may contain links to other websites operated by third parties. We make no representations or warranties in relation to privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices and procedures.

14. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.

Responsibilities

	Prepared	Reviewed	Approved
Name	HWL EbsWorth	Beatriz Jerez	Manuel Gonzalez Arrojo
Role	Lawyers	Corporate Compliance Delegate	Managing Director
Date	15/03/2021	15/03/2021	15/03/2021

Revision History

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00	03/02/2021	First version.	Sandra Olmo
01	15/03/2021	Second issue. New corporate identity.	Manuel Gonzalez Arrojo