

## 1 Privacy Statement

This policy applies to subsidiaries of Loscam International Holdings Co., Limited and their related bodies corporate in Australia (collectively referred to in this policy as "Loscam", "us" or "we").

### 1. Your rights in relation to privacy

We understand the importance of protecting the privacy of an individual's personal information and are committed to compliance with all applicable privacy laws. This statement sets out how we aim to protect the privacy of your personal information, your rights in relation to your personal information managed by us, and the way we collect, hold, use, process, transfer and disclose your personal information.

In handling your personal information, we will comply with all applicable data privacy laws. This privacy statement may be updated from time to time.

### 2. What kinds of personal information do we collect and hold?

Personal information is information that can be used to identify an individual (directly or indirectly), or includes an opinion about an identified, or reasonably identifiable, individual. During the provision of our services, we may collect your personal information.

Generally, the kinds of personal information we collect, with your consent (where applicable) include:

#### (a) Pre-employment

- (i) Application forms – name, email address, postal address, telephone numbers;
- (ii) Resume details – which will usually include details such as an individual's name, address, email address, telephone numbers, academic qualifications, employment history and referees;
- (iii) Reference checking;
- (iv) Pre-employment medical (with the prospective employee's consent and if relevant to their employment);
- (v) Drug and alcohol testing (with the prospective employee's consent and if relevant to their employment); and
- (vi) Criminal record checks.

#### (b) Employment

- (i) Employment application forms;
- (ii) Personal details including name, email address, postal address and telephone numbers;
- (iii) Emergency contact details;
- (iv) Bank account details (for payroll purposes);
- (v) Tax file number details;
- (vi) Performance reviews.

#### (c) Commercial customers

- (i) Sole proprietorships or partners – names, email addresses, postal addresses, telephone numbers and job titles of the contact persons, partners or officers in their professional capacity;
- (ii) Companies – company and/or business registration number, director details, contact details for senior managers or other contact persons;

- (iii) Financial details including banking details;
- (iv) Trade reference and credit checks;
- (v) Customer reference numbers and trading partner reference numbers.

**(d) Suppliers**

- (i) Personal details – including names, addresses, telephone numbers;
- (ii) Financial details including banking details;
- (iii) Sole proprietorships or partners – names, email addresses, postal addresses, telephone numbers and job titles of the contact persons, partners or officers in their professional capacity;
- (iv) Companies – company and/or business registration number, director details, contact details for senior managers or other contact persons.

**(e) Video monitoring records in public area of Loscam’s workplace.**

In some circumstances we may also hold other personal information provided by you.

### **3. How do we collect personal information?**

Generally, we collect your personal information directly from you, and retain a record of it, including through hardcopy forms or online forms via our internet (for external users) and intranet (for employees), or email communications.

**Examples of how we may collect personal information include:**

- (i) Opening a customer account;
- (ii) Registering for Loscam Online;
- (iii) Registering for HMS (Hire Management System);
- (iv) Surveys, newsletters, and focus groups;
- (v) Exchanges and discussions with you, whether in person or via telephone, email, fax or post; or
- (vi) our website, including the completion of online forms, registering or subscribing to any of our services, submitting material or information or otherwise requesting further information or services.

There may be other occasions when we collect your personal information from other sources, such as credit reporting agencies (in the case of customers and prospective customers), recruitment agents or referees in relation to job applicants, and publicly maintained records including publicly available information on social media or similar sites. Generally, we will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you.

### **4. What are the purposes for which we collect, hold, use and disclose your personal information?**

We collect, hold, use and disclose your personal information where it is reasonably necessary for the purposes of:

**(a) Customers or Suppliers**

- (i) delivering products or services and providing you, or an entity with which you are connected, with returnable packaging solutions and associated services;
- (ii) fulfilling any contractual obligations and business transactions with you, or an entity with which you are connected;

- (iii) fulfilling internal operational requirements;
- (iv) accounting, billing and other internal administrative purposes;
- (v) developing and facilitating a business relationship with you or an entity with which you are connected;
- (vi) providing you, or any entity with which you are connected, with customer support;
- (vii) inviting you to events, functions or training events and providing you with updates and publications (subject to your consent, if such information is provided to you in your personal capacity);
- (viii) identifying and informing you of our services that may be of interest to you (subject to your consent, if such information is provided to you in your personal capacity);

**(b) Job applicants**

- (i) assessing your suitability for a vacancy with us for which you have applied;
- (ii) background and reference checks;
- (iii) obtaining references in relation to you;

**(c) Employees**

- (i) payment of salary and other compensation;
- (ii) administration of benefits (including medical and retirement benefits), insurance claims and work related expenses;
- (iii) administration of immigration or visa requirements;
- (iv) tax return purposes and pension fund administration;
- (v) supervision and management;
- (vi) performance appraisals, promotions and career development activities;
- (vii) providing references in relation to you;
- (viii) disciplinary matters or to investigate complaints or grievances;
- (ix) human resources management purposes;
- (x) maintaining attendance records, including for sickness and other absences;
- (xi) taking decisions as to your fitness for work and for health management;
- (xii) training and staff development, including arranging staff social functions and recreational activities;

**(d) General**

- (i) enforcing our rights against you in any legal proceedings, or to defend ourselves against any claim, in relation to you;
- (ii) complying with applicable laws or regulations; or
- (iii) for any other purpose that you have consented to and/or which has been notified to you on or before the time when the personal data is collected.

Where personal information is used or disclosed, we take steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to us. However, if you do not provide certain information that we have indicated as mandatory, then we may not be able to provide our products and/or services to you.

**5. To whom do we disclose your personal information?**

We disclose your personal information to third parties (including its affiliates) for the purposes for which we collected it (or a directly related purpose). That is, generally, we will only disclose your personal information if that disclosure is necessary for the purpose(s) (or directly related

to the purpose(s)) for which that information was collected (as notified to you on or before the time of collection) or otherwise with your consent. This may include disclosing your personal information to third parties engaged to perform administrative or other business management services for us or our affiliates. This disclosure is always on a confidential basis or otherwise in accordance with law. We may also disclose your personal information with your consent or if disclosure is required or authorised by law. Examples of this disclosure include:

- Superannuation plan administration arrangements – we provide employees’ personal details to the external administrator of the superannuation plan to which the employee is a member;
- Payroll arrangements – we utilise a third party hosted programme to maintain our payroll data;
- Video monitoring – external security advisors/contractors and our managerial staff may view security tapes that have been recorded in the workplace;
- Medical – we may, with the employee’s consent, provide the company doctor or any medical specialists retained by us with employee’s medical records for the purposes of their employment with us;
- IT arrangements – our external IT providers have access to data contained within our systems. Those providers will only be provided access to personal information for the purposes for which they are contracted including software development and testing;
- Third party pallet controllers - we will not provide your information to third party pallet controllers unless you have authorised such access. Access to the Loscam Online portal will be controlled by your nominated company administrator to your account. Invoices and transaction details will only be provided to email and postal addresses nominated by the customer; and
- Truck driver access to our sites – Upon entering a Loscam site third party drivers will be required to complete an induction process. Personal information will be required to be provided, including name and address to provide subsequent evidence that an induction has been completed.

## **6. Overseas disclosure**

All data including personal and non-personal information is stored on servers located in the relevant jurisdiction in which it was collected (i.e. either Australia, Hong Kong or China).

By providing your personal information to us, you consent to us storing your personal information on servers hosted in the jurisdiction of collection; your personal information will remain within our effective control at all times. The server host’s role is limited to providing a hosting and storage service to us, and we’ve taken steps to ensure that our server hosts do not have access to, and use the necessary level of protection for, your personal information.

We may disclose personal information with our related companies overseas in order to provide necessary services and for administrative or other business management purposes. Our related companies are located in Australia, New Zealand, Malaysia, Indonesia, Philippines, Thailand, Vietnam, Myanmar, Singapore and the Greater China regions (including Mainland China, Hong Kong, Taiwan and Macau). Before disclosing any personal information to an overseas recipient, we take steps reasonable in the circumstances to ensure that the overseas recipient is bound by privacy obligations that are no less stringent than those imposed on us under the applicable data privacy laws that we are subject to in relation to your personal information, and (if required by applicable laws) will obtain your consent to the overseas disclosure, unless such overseas disclosure is otherwise required or permitted by applicable law.

## 7. Direct marketing

We cannot use or transfer your personal information to any third party for direct marketing purposes without your prior consent.

Subject to your prior consent, and the further details set out in the relevant personal information collection statement provided to you on or before the collection of your personal information, we may use your name, mobile phone number, email address, postal address, previous purchase history and personal preferences to provide you with materials relating to any information, newsletters, promotions, rewards, discounts, offers or events, which are in relation to logistics, packaging and shipping products or services provided by us or our affiliates, subsidiaries or holding companies ("**Marketing Materials**"). Subject to your prior consent, we may disclose your name, mobile phone number, email address, postal address, previous purchase history and personal preferences to our affiliates, subsidiaries or holding companies, in order for them to send you the Marketing Materials

You have the right to choose to receive any Marketing Materials or to have your personal data transferred to our affiliates, subsidiaries or holding companies in order to send you Marketing Materials, by checking the appropriate opt-in box on the relevant forms we used to collect your personal information.

You can also ask us to cease providing you with Marketing Materials at any time, by sending a request via the contact details set out in paragraph 14 or through any opt-out mechanism contained in a marketing communication to you.

## 8. Security of your personal information

We take all of the necessary technical and organizational security measures reasonable in the circumstances to ensure that the personal information we hold is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. We hold personal information in both hard copies and electronic forms in secure databases on secure premises, accessible only by authorised staff.

Personal information we hold is generally stored in computer systems. These may be operated by our service providers. In all cases, we have rigorous information security requirements aimed at eliminating risks of unauthorised access to, and loss, or misuse of information. These requirements include but are not limited to:

- Access control for authorised users such as user names and passwords;
- Limiting access to shared network drives to authorised staff;
- Virus checking; and
- Specialised IT support to deal with security risks.

In certain cases, your personal data is encrypted by Secure Socket Layer technology ("**SSL**") during transmission. This means that an approved encryption procedure is used for communication between your computer and our servers if your browser supports SSL.

However, despite all our efforts, please be aware that no security measures or systems are perfect. We cannot fully guarantee that the storage and process of your personal information is absolutely secure. To the extent permitted by applicable laws and regulations, we shall not be liable for any damages or losses in connection with your personal information caused by:

- (a) act of God such as floods, tornadoes earthquakes, bushfires or epidemics;
- (b) social event such as wars, riots or government actions;
- (c) any computer virus, trojan horse or other malware;
- (d) theft, burglary, robbery or any criminal offence in this kind, or any intrusion or illegal conduct by hackers; or
- (e) any reasons beyond our reasonable control or predictability.

## **9. Retention of personal information**

We shall destroy or de-identify personal information in order to anonymise it in circumstances where it is no longer required for the purposes it was collected, unless we are otherwise required or authorised by law to retain the information. Generally, personal information will be destroyed after a period of 7 years following its collection or an employee's separation from the business, or 2 years in relation to an unsuccessful job applicant who has been rejected, unless it is required or may be required to be kept for longer due to the purpose for which it was originally obtained, or subsequent circumstances which require it to be held for a longer period. This includes inactive customer accounts.

## **10. Can you remain anonymous?**

Our website at [www.Loscam.com](http://www.Loscam.com) or other associated websites owned by Loscam can be accessed without telling us who you are or revealing any personal information. However, we may use tracking software to collect your IP address, the website you came from, and the website you visit next. This information may be aggregated to measure statistics about visitors to this site. We may also use this data to monitor site performance and to make the site both easier and more convenient to use. We do not use this software to collect individual personal data or individual IP addresses. The data are used solely in anonymous and summarized form for statistical purposes and for developing the website.

You should be aware that we may be required to disclose your personal information without your consent in order to comply with any court orders, subpoenas, or other legal process or investigation including by tax authorities, if such disclosure is required by law. Where possible and appropriate, we will notify you if we are required by law to disclose your personal information.

## **11. Use of Cookies**

"Cookies" are small files that enable us to store information related to your computer and you, the user, specifically, while you visit one of our websites. Cookies help us determine how frequently our internet pages are accessed as well as the number of users, and they help us configure our offers so that they are as convenient and efficient as possible for you.

We use what are called "session cookies", those that are stored exclusively for the duration of your visit to one of our internet pages. We also use "persistent cookies" for retaining information about visitors who repeatedly access one of our internet pages. The purpose of using cookies is to be able to offer you optimal user guidance as well as to "recognize" you and thus be able to present (as much as possible) diversified internet pages and new contents during repeated use.

Generally, we do not create an individual profile of your online activities. The content of a persistent cookie is limited to a reference number, and your name, email address, IP address, etc., are not saved on the majority of our sites.

## **12. Can you access and correct the personal information that we hold about you?**

We take steps reasonable in the circumstances to ensure personal information we hold is accurate, up-to-date, complete, relevant and not misleading. You have a right to access and seek correction of your personal information that is collected and held by us.

If at any time you would like to access or correct the personal information that we hold about you, or you would like more information on our approach to privacy, please contact us via the contact details set out in paragraph 14 below.

We shall grant access to the extent required or authorised by applicable data privacy law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- (a) you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- (b) we request that you be reasonably specific about the information you require; and
- (c) we may charge you a reasonable administration fee, which reflects the cost to us for providing access in accordance with your request.

We may choose not to release your personal information, as permitted under the applicable data privacy laws. For example, if it is not possible to provide you with your requested personal information without revealing the personal information of another individual.

If we refuse your request to access or correct your personal information, we will provide you with written reasons for the refusal and details of complaint mechanisms. We will also take steps reasonable in the circumstance to provide you with access in a manner that meets your needs and our needs.

We will endeavour to respond to your request to access or correct your personal information within 40 calendar days from your request.

## **13. Data Breach**

In the event of a breach of privacy and/or personal data, Loscam will follow the requirements of the Australian Privacy Act and the Australian Privacy Principles, including the below key steps:

- (a) Contain the data breach to prevent any further compromise of personal information;
- (b) Assess the data breach by gathering the facts and evaluating the risks, including potential harm to affected individuals and where possible, taking action to remediate any risk of harm;
- (c) Notify affected individuals and the Commissioner if the breach of data is considered an eligible data breach under the Notifiable Data Breaches (NDB) scheme of the Australian Privacy Act; and/or
- (d) Review the incident and consider what actions can be taken to prevent future breaches.

According to the Australian Privacy Act, notifiable breaches occur when the following criteria are met:

- (a) There is unauthorised access or disclosure of personal information held by Loscam;
- (b) The breach is likely to result in serious harm to any individual to whom the information relates; and or
- (c) Loscam has been unable to prevent the likely risk of serious harm with remedial action.

#### **14. How to contact us**

For further information or enquiries regarding your personal information, or to submit a data access or correction request, or if you would like to opt-out of receiving any promotional or marketing communications, please contact Loscam's Privacy Compliance Officer at:

The Privacy Compliance Officer

Loscam Australia  
Level 1, 37-41 Prospect St  
Box Hill Victoria 3128  
+61 3 9843 3700, or  
privacy@loscam.com

#### **15. Privacy complaints**

If you have any privacy complaints, please contact our Corporate Legal Department using the contact details set out in paragraph 14 above. At all times, privacy complaints will:

- (a) be treated seriously;
- (b) be dealt with promptly;
- (c) be dealt with in a confidential manner; and
- (d) not affect our existing obligations or affect the commercial arrangements between you and us.

Our Corporate Legal Department will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation.

If you are located in Australia, and are not satisfied with the outcome of Loscam's assessment of your complaint, you may wish to contact the Office of the Australian Information Commissioner.

#### **16. Third party websites**

This privacy policy only applies in relation to the collection, retention, processing, transfer and use of personal information by us. If you click on a hyperlink taking you from this website to another website, we shall not be responsible for the privacy and security practices or the content of such website, or any collection of your personal information by the third party operating such website, and you should refer to the privacy policy of each website you enter.

#### **17. Language**



This privacy policy is written in the English language. If they have been translated into any other language, the English version shall prevail in the event of any discrepancy.

**18. Updates**

This privacy policy is current at the date below. We may change it periodically. If we change this policy, we will display the updated policy on [www.loscam.com](http://www.loscam.com) and also provide a link to the previous archived copy on [www.loscam.com](http://www.loscam.com). Last update of this Privacy Policy: 12-Nov-2020.