

PRIVACY POLICY

About this Policy

J.J.Richards & Sons Pty Ltd and our associated entities (**the JJ Richards Group**) respect the privacy of individuals. The JJ Richards Group is committed to protecting the personal data it collects in accordance with the principles set out in this Privacy Policy (**Policy**).

This Policy covers:

1. the kinds of personal information the JJ Richards Group collects and hold;
2. how the JJ Richards Group collects personal information;
3. how personal information is secured and stored;
4. the purposes for which the JJ Richards Group collects, holds, uses and discloses personal information;
5. any direct marketing the JJ Richards Group may engage in, and your right to anonymity;
6. utilizing the JJ Richards Group websites;
7. how you may access your personal information and how you may seek to correct any errors in information held;
8. how you may make a complaint and the process that the JJ Richards Group will take to investigate and resolve that complaint; and
9. whether the JJ Richards Group is likely to disclose personal information to overseas recipients, and if so the countries any such recipient is located.

What is Personal Information?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identified, whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not (**Personal Information**).

1. THE KIND OF PERSONAL INFORMATION THE JJ RICHARDS GROUP COLLECTS

The JJ Richards Group holds Personal Information such as: full name, address and contact details (i.e. telephone, email, and postal address), credit card and bank account details; vehicle registration numbers; and video and photographic images of individuals.

2. HOW DOES THE JJ RICHARDS GROUP COLLECT PERSONAL INFORMATION?

Personal Information is collected in the following ways:

- electronic forms submitted via the JJ Richards Group websites or app or your use of the JJ Richards Group our websites or apps;
- cookies (small text files which are transferred onto your device when visiting a website);
- job applications submitted in hard copy, via email, our websites and third party service providers i.e. Seek;
- by advertising vacancies online via our website, Seek and through recruitment agencies;
- service agreements for JJ Richards Group services;
- face to face interactions;
- waste collection services;
- phone calls;
- emails;
- financial transactions;
- third party service providers;
- photographs and video recordings; and
- third party business dealings.

3. SECURITY AND STORAGE OF INFORMATION

a) Our commitment

The JJ Richards Group places a great importance on the security of all information associated with our clients and others who deal with us. We have security measures in place to reasonably protect against the loss, misuse, unauthorised access and alteration of Personal Information and other data under our control.

b) Security and storage methods

All Personal Information and other data held is kept securely and that which is held electronically is held on secure servers in controlled facilities.

Personal Information is de-identified or destroyed securely when no longer required by us.

Information stored within the JJ Richards Group's computer systems or by our agents who provide electronic storage facilities can only be accessed by those entrusted with authority and computer network password sanctions.

The JJ Richards Group consults with IT service providers to implement reasonable levels of firewall, malware detection and data security procedures.

c) Electronic transmissions

No data transmission over the internet can be guaranteed to be absolutely secure. As a result, whilst we strive to protect users' personal information (including Personal Information), the JJ Richards Group cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once a company within the JJ Richards Group receives a transmission, we make every effort to ensure the security of such transmission on our systems.

d) Data breach and response

JJ Richards Group has developed a data breach response plan which ensures compliance with the mandatory notification requirements of Part III C of the *Privacy Act 1988* (C'th).

As part of this plan, JJ Richards Group will:

- i. carry out an assessment to determine if the breach is a breach in respect of which notification is required within 30 days of becoming aware or being notified of a data breach; and
- ii. take any immediate remedial action as is reasonable to remedy the breach or stop any furtherance of the breach.

If notification of the breach is required, JJ Richards Group will:

- i. provide a statement in relation to the breach to the Office of the Australian Information Commissioner (**OAIC**); and
- ii. if it is practical for us to notify affected individuals directly, we will notify any individuals the information of which was subject to the breach and provide them a copy of our statement; or
- iii. if it is impractical for us to notify affected individuals directly, we will publicise the statement on our websites and otherwise act in accordance with the requirements of the Act.

4. THE PURPOSE FOR WHICH WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

To enable us to fulfil our responsibilities as an integrated provider of transport, disposal, treatment, storage and related services and, we collect Personal Information about you to enable us to effectively conduct our business.

a) Collection and use of Personal Information

The Personal Information we collect may be used:

- when you are a customer or the personnel of one of our customers, or are a recipient or consignee of services provided by us, create an account or use or receive the benefit of our services, we may collect

the following types of information: your name, address, phone, email, full bank account details and/or credit card numbers that you link to your account or input when you use our services. We will use this information to communicate with you regarding the services;

- when you supply services to us, we may request the following information: your name, address, phone, email, full bank account details and/or credit card numbers that you link to your account or input when you use our services. We will use this information to communicate with you regarding the services or products you supply us;
- when you are a customer or a supplier, we will use your financial information to process transactions related to our business relationship;
- whenever you contact us or respond to our communications (e.g., letters, email, telephone), we receive your contact information and any other personal information you choose to provide us. We will use such information to fulfil your requests or if you are our customer or the personnel of customers, or our supplier or personnel of suppliers, we will use this information in connection with the services or supply;
- to consider you for a position within our business, if you apply for an advertised role or send us your resume or Personal Information in connection with a request for prospective employment. We may collect personal information directly from job applicants through the interview process. In addition, we may request personal information from your previous employers, recruitment agencies, educational institutions and referees as provided by you in the application process. We may also ask you for personal and/or health information for use in recruitment related medicals. We will use such information for the purposes of considering you for a position of employment;
- via cookies to maintain your login session on the customer portal and collect information through the use of Google Analytics and Piwik. Cookies are used to improve our website and meet customer needs;
- in connection with legal and/or insurance proceedings if you were involved in or a witness to an incident involving us and you exchange emails, telephone conversations or other communications with our employees and, we may record details of any related conversations;
- some of our premises have closed circuit TV systems or other video monitoring devices which may record you if you visit our premises, for security and safety purposes;
- Our websites and customer portal utilise Google Analytics and Piwik to collect basic data in order to assist us in designing and improving our website to meet the needs of our customers. The types of data collected are as follows; website traffic assessment, time spent on site, pages viewed, geographic – location and language, date and time of access, demographic of visitors – age and gender, number of repeat visits, device type, operating system, device screen size and resolution, pathways through the site; and entry and exit points;
- To process payment. Payments made via our websites and/or the customer portal are managed by a third party payments provider, eWay. When entering credit card details, our websites and customer portal provide the option of saving your credit card details for ease of use. If you chose to save your credit card details, the card number is masked to everyone with access to your account, including you.
- All credit card information held and stored is encrypted by our third party payments provided to prevent unauthorised access. Unsaved credit card details are encrypted and transmitted via secure connection from our website handler. Saved credit card details are stored securely on eWay servers.

We will only collect Personal Information to the extent that it is required for the specific purposes set out in this policy or notified to you at the time of collection.

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b) Disclosure of Personal Information

We utilise various third party service providers to whom we provide your personal information to, including:

- our financial institution and your financial institution;
- debt collection agencies;
- insurance companies;
- legal, financial and other advisors;

- web hosting providers **and** designers; and
- payment processors.

All information provided to any of the abovementioned service providers is provided on a confidential basis and for the purpose of conducting and performing the required services only.

5. DIRECT MARKETING

a) We may carry out direct marketing

As part of the JJ Richards Group's functions and business activities and to promote the services we can provide to our customers, including in respect of a company within the JJ Richards Group credit-related activities, a company within the JJ Richards Group may be permitted to use personal information about individuals that individuals have provided to the JJ Richards Group for the purposes of direct marketing. Direct marketing includes, but is not limited to, sending information to and/or contacting individuals in relation to promotions relating to a company within the JJ Richards Group.

b) Opting out of Direct Marketing

All recipients, including individuals, can opt out of receiving direct marketing communications by sending an email to the JJ Richards Group's Privacy Officer, at the email address shown in the 'Contacting us' section of this Policy.

In any direct marketing communication we remind recipients of their right to opt out of receiving direct marketing communications. Moreover, as a general rule, a credit provider such as a company within the JJ Richards Group is not permitted to disclose to others Personal Information about individuals for the purposes of direct marketing.

c) Anonymity and Pseudonymity

Individuals would generally have the option of dealing with a company within the JJ Richards Group anonymously. However, this only applies where it is not impracticable for a company within the JJ Richards Group to deal with individuals acting anonymously or under a pseudonym. For example, individuals making general enquiries of a company within the JJ Richards Group may do so anonymously or under a pseudonym. However, if the dealing with a company within the JJ Richards Group is for a company within the JJ Richards Group to supply goods and services and/or to enter into contractual relations (such as a commercial credit account) with a customer that is the individual or is associated with the individual or in a company with the JJ Richards Group capacity as an agent for other credit providers, then it is impractical for such individuals to deal with a company within the JJ Richards Group on an anonymous basis or under a pseudonym.

6. WEBSITE AND LINKS

a) JJ Richards Group websites

The JJ Richards Group advertises and carries on business through a number of websites pertaining to each company within the JJ Richards Group, including:

www.jjrichards.com.au
www.jjrichards.co.nz
www.jjswaste.com.au
www.pulpmaster.com.au
www.pacifichygienesystems.com
www.southburnettwaste.com.au
www.phoenixpower.com.au
www.skiptech.com.au
www.asbestoskipbinsbrisbane.com.au
www.aztechservices.com.au
www.goldcoastskips.com
www.jjswaste.com
www.pulpmasterusa.com

and any other website that contains a link to this policy.

b) Website terms and conditions

Each website of the JJ Richards Group collects personal and Personal Information pursuant to this policy except as otherwise stated on the website.

A website may display additional terms and conditions for access and use of the website which apply in addition to this policy.

c) Cookies

The JJ Richards Group may collect information from its websites using IP files or “**cookies**”. When a user visits the JJ Richards Group’s websites to read, browse or download information, our system may record/log the user’s IP address (the address which identifies the user’s computer on the internet and which is automatically recognised by our web server), date and time of the visit to our website, the pages viewed and any information downloaded.

Cookie information collected will only be used for the purpose of site analysis and to help us offer improved online services. We may automatically collect non-personal information about users such as the type of Internet browsers used or the website from which the user linked to our websites. Individuals cannot be identified from this information and it is only used to assist us in providing an effective service on our websites.

You can stop your browser receiving or accepting cookies at any time, however the use of cookies is necessary for certain functions on our websites to work properly and therefore we cannot assure you that you will be able to access and enjoy all functions of our website.

d) Third party links

Our websites may contain links to other websites and those third party websites may collect personal information about individuals. We are not responsible for the privacy practices of other businesses or the content of websites that are linked to our websites. The JJ Richards Group encourage users to be aware when they leave our website and to read the privacy statements of each and every website they frequent.

7. ACCESS TO, AND CORRECTION OF PERSONAL INFORMATION

a) Our commitment

The JJ Richards Group is committed to and takes all reasonable steps in respect of maintaining accurate, timely, relevant, complete and appropriate information about our customers, clients and website users.

b) Access to information

Any individual may request access to personal information (including Personal Information) about them held by the JJ Richards Group. Such a request for access to personal information is to be made to the JJ Richards Group’s Privacy Officer, whose details are set out below.

A company within the JJ Richards Group will respond to any requests for access or correction within a reasonable time of receipt of the request, but by no later than 30 days of the request being received.

Please note that the JJ Richards Group do require that, as part of any request by an individual for access to personal information (including Personal Information), the individual verify their identity so that a company within the JJ Richards Group may be satisfied that the request for access is being made by the individual concerned.

Please note that the JJ Richards Group is not required to give an individual access to Personal Information about them in circumstances where:

- i. giving access would be unlawful; or
- ii. denying access is required or authorised by or under an Australian law or a court/ tribunal order; or
- iii. giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

If we refuse to provide an individual with access to their Personal Information or to correct the Personal Information held by us about them, then we will provide reasons for such refusal. Such reasons will set out

the grounds for refusal, the mechanisms available to complain about the refusal and any other matters that are required by the Act.

c) Correction of Information

Inaccurate information will be corrected upon receiving advice to this effect. To ensure confidentiality, details of an individual's personal information (including Personal Information) will only be passed on to the individual if we are satisfied that the information relates to the individual.

From time to time, and having regard to the purpose of the collection and use of personal information (including Personal Information) about individuals, we may contact individuals to seek confirmation that the personal information provided to us by the individual is accurate, up-to-date and complete.

8. COMPLAINTS

a) Making a complaint

If an individual has a complaint about this policy or/ or the JJ Richards Group's collection, use or safe disposal or destruction of Personal Information about the individual, any complaint should be directed in the first instance to the JJ Richards Group's Privacy Officer at the contact details set out in the 'Contacting us' section of this policy.

b) Investigation and Resolution Procedure

Upon receiving a complaint we will, within 7 days, give the complainant written notice acknowledging receipt of the complaint and setting out the process of how we will deal with it.

We aim to resolve all complaints within 30 days of receipt. If we cannot resolve a complaint within 30 days we will notify the complainant of the reasons and specify a date when we expect a decision or resolution will be made and seek the complainant's agreement to extend the 30 period – if the complainant does not agree then we may not be able to resolve the complaint

It may be necessary (and it may be required by the Act), in order to deal with a complaint, to consult with a CRB or another credit provider. Further, if, while a complaint remains unresolved, we are disclosing information subject to the complaint to a third party, we may be required to advise the third party about the complaint.

If we find a complaint is justified we will resolve it and do what is required to rectify any breach. The JJ Richards Group are committed to fulfilling its obligations as an APP entity and a credit provider under the Act.

The complainant may refer their complaint to the Office of the Australian Information Commissioner. The website for the OAIC is: www.oaic.gov.au

9. TRANSFER OF INFORMATION OVERSEAS

a) Use of cloud services

The JJ Richards Group may utilise local and overseas cloud services for the purpose of storing information. Your Personal Information may be disclosed to the JJ Richards Group's cloud service provider for that purpose. While the JJ Richards Group's cloud service providers are located in Australia, the country location of our cloud service providers may periodically change.

b) Other disclosures

Except as provided in clause 9, the JJ Richards Group are unlikely to disclose Personal Information of an individual to overseas recipients. Personal information will only be disclosed by a company within the JJ Richards Group to overseas recipients in accordance with Australian Privacy Principle 8, such as if the disclosure is required by Australian law.

10. CHANGES TO POLICY

If the JJ Richards Group decide to or are required to change this policy, we will notify you of such amendments on our websites and post changes on this policy webpage so that users may always be aware of what information is collected by us, how it is used and the way in which information may be disclosed. As a result, please refer back to this policy regularly to review any amendments.

11. CONTACT

For concerns, complaints or further information regarding this policy and our policies and procedures regarding privacy and data security, please contact us at the following address:

Position	General Counsel & JJ Richards Group Privacy Officer
Email:	legal@jjrichards.com.au
Telephone:	07 3488 9600
Post:	PO Box 235 Cleveland QLD 4163