

## Privacy Policy (POL-1)

The Privacy Act 1988 (Cth) requires corporations to regulate the way in which they deal with personal information and requires entities bound by the Australian Privacy Principles to have a privacy policy.

Waste Wise Environmental Pty Ltd (Waste Wise) is required to comply with the Privacy Act.

Waste Wise has established this Privacy Policy to outline the personal information handling practices of Waste Wise and to implement a system for the business and its staff to manage personal information.

This Privacy Policy & Guidelines will be monitored by the Human Resources Officer. Any queries or any uncertainty regarding matters are to be referred to the Human Resources Department.

This policy will be updated when our information handling practices change.

### **What is Personal Information?**

“Personal information” is any information that can identify an individual or allow someone to make enquiries to identify an individual. Some examples of personal information are names, addresses, telephone and fax numbers, email addresses etc.

The Privacy Act excludes our employees’ personal information but does not exclude information on past and prospective employees or any contractors or sub-contractors.

Waste Wise’s Policy is based on the Privacy Principles outlined in the Privacy Act is outlined below:

### **1. Collection & Indirect collection**

Waste Wise may collect personal information needed to fulfil its legitimate functions (“Waste Wise’s Functions”). Waste Wise will only collect personal information by lawful and fair means and not in an unreasonably intrusive way.

We will only collect this information lawfully and during the course of our normal business transactions.

In the course of handling and resolving a complaint, data breach notification, review or an investigation, we may collect personal information about you indirectly from publicly available sources.

Waste Wise does not collect and store any sensitive information.

### **2. Use and Disclosure**

Waste Wise may use and disclose personal information for activities associated with the Waste Wise functions (“secondary purpose”).

Waste Wise will only collect personal information for a purpose other than for Waste Wise’s functions if:

- (a) the secondary purpose is related to the Waste Wise functions and if individuals would reasonably expect us to collect that information; or
- (b) the individual has consented; or

(c) we use that information for direct marketing and it has not been practicable for us to get your consent before using that information.

In some instances, we will attempt to obtain consent to use or disclose personal information for secondary purposes such as direct marketing activities, however, sometimes this may not be practicable.

In these circumstances, we recognise that some customers may not want us to use or disclose their personal information for this purpose and they should be free to inform us of this fact. Once a customer has notified us in writing that they wish to be removed from our direct marketing database, we will remove them from our database as soon as possible.

We recognise that an individual may wish to be removed from our direct marketing database or have his or her personal information deleted from our systems at any time.

### **3. Data Quality**

We will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date.

Waste Wise updates much of the information we hold on the request of a customer. We rely heavily upon our customers notifying us when their information changes. However, from time to time we will “refresh” our database to ensure the information we hold is correct.

Some information is held on systems that are no longer in use but are still maintained by Waste Wise. We will endeavour to assess these systems periodically and delete old or inaccurate information from these systems where possible.

### **4. Data Security**

Waste Wise will take reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification, or disclosure.

We have a secure computer and information management system and will do our utmost to ensure it is safe from unauthorised use. This means disabling access to former employees and having systems in place to protect personal information from unauthorised use.

We back up all electronic information on a regular basis and keep copies of this information which are securely held.

Only employees who need access to personal information are authorised to do so. We will ensure that all existing and new employees are given a copy of this document.

We will provide resources to all our employees to enable them to understand their obligations under the Privacy Act.

We will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed.

We will delete or destroy information that is no longer needed for Waste Wise Functions or secondary purposes.

Some information is held on systems that is no longer used but still maintained by Waste Wise . We will assess these systems periodically and delete old or inaccurate information where possible.

## **5. Openness**

We will maintain a Privacy Policy Statement and these Privacy Guidelines setting out how we will manage personal information.

We will provide a copy of our Privacy Policy to anyone who asks for a copy of them.

If requested, we will take reasonable steps to let any individual know, generally, what sort of personal information we hold, for what purpose, and how we collect, hold, use and disclose that information.

All requests should be made to us in writing, setting out what the individual would like to know about what personal information we are holding. This request must be referred to the Waste Wise Human Resources Department. On receiving this written request, the individual will be notified, generally what sort of personal information we hold, for what purpose and how we collect, hold, use and disclose that information.

We will aim to answer all requests within one month of receipt of the request. However, in some circumstances, it may not be practicable to do so. If this is the case, we will indicate how long it might take us to furnish the request.

## **6. Access and Correction**

We will provide an individual with access to their personal information upon written request. Exceptions to this are outlined below.

The exceptions to this are where:

- (a) providing access to the information will threaten the life, health or privacy of another individual;
- (b) the request is frivolous or vexatious;
- (c) the information relates to existing or anticipated legal proceedings between us and the individual and the information would not normally be discoverable;
- (d) providing access would reveal our intentions in negotiations with the individual and might prejudice those negotiations;
- (e) providing access would be unlawful;
- (f) denying access is required by law; or
- (g) providing access could threaten the privacy of other individuals;
- (h) providing access may prejudice a lawful investigation, the enforcement of laws, protection of public revenue or the preparation for court proceedings; or
- (i) if the provision of this information threatens the security of Australia.

All written requests for access to or copies of personal information held by Waste Wise must be directed to the Managing Director who will then assess the request subject to the provisions of the Privacy Act.

Once we have provided an individual with access to or copies of their personal information and that individual is able to establish that the information is inaccurate, incomplete or out of date, or they object to it in some other way, we will correct the information. If we disagree with the individual

about whether the information is accurate or the basis upon which they object to us holding the information, we will try to resolve the matter directly with them.

If we cannot resolve the matter we will refer it to the Privacy Commissioner for a determination.

Waste Wise will give written reasons for our refusal to provide correction or access to the personal information.

## **7. Identifiers**

Waste Wise will not require or use any identifying information.

“Identifying information” includes Medicare numbers, tax file numbers, pension numbers or other identifiers as defined in the Privacy Act.

One exception to this policy is where Waste Wise as required by law, may collect the tax file number of contracted staff and pass it on to our superannuation provider or the Australian Tax Office.

## **8. Anonymity**

Where we are able to, we will allow customers to deal with us anonymously. For example, if a potential customer wants a quote and does not want to be identified, we may ask for a written request for a quote on the letterhead of the company requesting the quote and will not need any personal information from that individual.

However, for some of our functions and activities we may need your name and contact information and enough information about your particular matter to enable us to fairly and efficiently handle your request, complaint or inquiry.

## **9. Transborder data flows**

We will not disclose your personal information except as required to perform Waste Wise functions or if required to do so by any other Commonwealth, State or Territory law.

## **11. Complaints or disputes to the Privacy Commissioner**

If anyone has a concern, or a complaint regarding Waste Wise’s use of their personal information they must be directed to Frank Cardamone, Managing director – [frank@wastewise.com.au](mailto:frank@wastewise.com.au).

We will attempt to resolve any complaints regarding privacy issues directly with the complainant but if unsuccessful the complaint will be referred to the Privacy Commissioner for a determination.