


Policy title and no:	<b>Privacy Policy</b>		
Author: Thea Emetlis		Approved By: Gert Erik Engelen	
Created date: <b>Feb 2018</b>	Revision no: <b>2018-002</b>	Approved date: <b>30 November 2018</b>	Valid from date: <b>1 December 2018</b>

## Purpose

The purpose of the Privacy policy document is to outline the procedures and policies in place to protect privacy and keep personal information confidential.

We are committed to protecting your privacy and will handle your personal information in accordance with this Privacy Policy and in accordance with our obligations under the Privacy Act 1988 (Cth), including the Australian Privacy Principles, as amended from time to time.

This Privacy Policy covers:

Securitas Australia, which includes PSGA Pty Ltd, Securitas Transport and Aviation Services Pty Ltd, and their related bodies corporate (as defined in the Corporations Act 2001 (Cth)); and (together and separately, **Securitas, we, us or our**).

## 1. What is personal information and sensitive information?

Personal information is any information or an opinion about an identified individual, or information from which an individual can be identified.

Sensitive information is a special category of personal information and includes information or an opinion about a person's health, race or ethnic origin, political or religious beliefs, membership of a trade union or association, criminal record, sexual orientation and genetic and 'biometric' information.

Securitas shall also treat credit card or bank account information as sensitive.

Securitas will only collect a person's sensitive information where it is reasonably necessary for one or more of Securitas functions or activities and with the person's consent.


## 2. What kind of personal information do we collect and hold, and why do we do so?

### 2.1 General

We collect your personal information relating to individuals (including, but not limited to, our customers, contractors, suppliers and employees) in the performance of our business activities, to provide services to you and/or to obtain services from you.

The kinds of personal information that we collect will depend upon the dealings the relevant individual may have with Securitas. Securitas may collect and hold information about:

- Customers or potential customers of Securitas products and services (for example, in the ordinary course of dealings, in relation to credit applications and sales and marketing and promotional activities);
- Suppliers (for example, when establishing records and systems to enable payment for goods or services);
- Job applicants (for the purposes of employment);
- Employees (employee records);
- Individuals as contractors (for example, when establishing records and systems to

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enable payment for services);

- Other individuals who may come into contact with Securitas.

The kinds of personal information may include, but are not limited to:

- information that identifies the individual (for example, name, address, contact details);
- information about the individual's financial position (credit worthiness);
- information about the individual that is required or authorised by law;
- Where the individual is an employee or prospective employee or contractor, their date of birth, tax file number, employment history, references, educational qualifications, dependants, driver's licence, passport details, residency or visa status etc;
- The individual's opinion about Securitas products, services or staff.

## 2.2 Legislative and Regulatory requirements

We may also collect your personal information to comply with legislative and regulatory requirements, including those arising under the Aviation Transport Security Act 2004 (Cth) and the Aviation Transport Security Regulations 2005 (Cth).

## 3. What happens if you do not give us this information?

It is your right not to give us any information and not to identify yourself to us. However, if you choose not to give us the personal information we request or you do not wish to identify yourself to us, we may not be able to employ you or provide you with the services or information you require.

## 4. How do we collect your personal information?


We generally collect personal information directly from you (unless you otherwise provide your consent). We collect the personal information you give us electronically including information provided: through your use of our website; during phone calls with our representatives; when we deliver and administer our services; and on forms or other correspondence, in writing or electronically, completed by you.

We may collect personal information about you from third parties and will let you know if we do so.

If we receive personal information about you that we have not requested, and if we determine that we could not lawfully have collected that information had we requested it, we will destroy or de-identify the information, if it is lawful and reasonable to do so.

### *Cookies*

When you visit our website, it will send a cookie to your computer. This is a small piece of information stored on your hard drive which tells us that your computer has accessed our website. The cookie will not be able to identify you. If you do not want to use cookies, you can set your browser to reject them. We use cookies to collect data from our website to help us understand which are the most popular pages and when the peak usage times are, along with other information that helps us improve the content and make the navigation of our website easier.

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#### *Links on our website*

Our website may contain links to third party websites. We advise that the terms of this Privacy Policy do not apply to external websites. If you wish to find out how a third party handles your personal information, you will need to obtain a copy of its Privacy Policy.

#### Workplace for Facebook

Your personal data is processed in order for Securitas to be able to provide you with a user account, give you access to the Service and administrate your user account in the Service. Securitas may also use your personal data in order to control, prevent, investigate or carry out other measures in connection with misuse of the Service or violations against the terms of use for Workplace, the Acceptable Use Policy or this Privacy Policy or in connection with legal measures, suspicion of fraud or potential threats against Securitas' or third party rights.

The Service may include links to websites and services provided and maintained by third parties. If you wish to find out how a third party handles your personal information, you will need to obtain a copy of their Privacy Policy.

Please note that the Service is separate from other Facebook services that you may use, such other Facebook services are provided to you by Facebook and are governed by their own terms. For the avoidance of doubt, this Privacy Policy is not applicable to any such services.

#### *Credit information*

We may obtain information that has a bearing on: an individual's eligibility to be provided with credit; or their history in relation to credit; or their capacity to repay credit (all, 'credit information') directly from an individual or from a Credit Reporting Body (CRB) in connection with an application for commercial credit or provision of a guarantee relating to such an application. We will only do so where an individual has consented to the disclosure of that information.


Where we obtains such credit information, we will only use that information for the credit guarantee purpose; or our internal management purposes that are directly related to the provision or management of any credit by it or for debt collection purposes

We will take such steps (if any) as are reasonable in the circumstances to ensure that the credit information we collect is accurate, up-to-date and complete. When we no longer need it for the purpose for which it was collected, we will take such steps as are reasonable in the circumstances to destroy the information or to ensure that the information is de-identified.

#### **5. How do we use your personal information?**

Your personal information is collected so that we can: comply with the law, including do anything that we are required or authorised by the law to do; manage our relationship with you; resolve any legal and/or commercial complaints or issues; facilitate our business operations, including to perform other functions and activities relating to the business of Securitas and improve our services; and identify and (unless you tell us not to) tell you about our products and services, and those of third parties, that might interest you.

Generally, we will not use or exchange your information for any purpose other than one that is set out in this Privacy Policy, or for a purpose which is disclosed to you and to which you have

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consented.

## 6. Do we disclose information to third parties?

We may share or disclose your personal information for any of the reasons mentioned above to third parties, including: our related bodies corporate, agents, external advisers and our external service providers and contractors (such as any commercial agent or support services); government agencies including law enforcement, regulatory and dispute resolution bodies (or any other body to whom disclosure is required by law or court/ tribunal order); and any other person or entity to whom disclosure is authorised by you.

We will not share your sensitive information with any person or entity other than: our related bodies corporate; our employees, and the employees of our related bodies corporate; government or regulatory authorities (including law enforcement bodies, tribunals and courts), where required or permitted by law; and any other person as permitted by law.

We share your personal data with third party service providers who assists Securitas by providing certain services in relation to Securitas business and therefore processes personal data on Securitas' behalf. This will include:


- IT infrastructure providers, developers and hosting providers;
- IT support service providers; and
- other third party service providers such as software providers and service providers, which facilitates or provides certain services to us in order for us to be able to provide you with access to the Service.

These third party service providers are authorised to use your personal data only as necessary to provide its services to us and they do not have any independent right to process or share your personal data.

Securitas will, furthermore, share your personal data that Securitas collects with Facebook, as ultimate provider of the Service, in order to provide and support the Service, and in accordance with any other instructions received. Examples of such use include:

- communicating with users and administrators regarding their use of the Service;
- enhancing the security and safety of the Service for Securitas and other users, such as by investigating suspicious activity or breaches of applicable terms or policies;
- personalising your and Securitas' experiences as part of the provision of the Service;
- developing new tools, products or services within the Service for Securitas;
- associating activity on the Service across different devices operated by the same individual to improve the overall operation of the Service;
- to identify and fix bugs that may be present; and
- conducting data and system analytics, including research to improve the Service.

When we disclose your information to a third party, we take all reasonable steps to ensure that those third parties are bound by confidentiality and privacy obligations with respect to the protection of your personal information.

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## 7. Do we disclose your personal information to overseas recipients?

We will not disclose your personal information to organisations located outside Australia without your written consent except as set out below or where disclosure is otherwise authorised or required by law or court/ tribunal order.

We may disclose your personal information to our overseas operations or third party service providers that we outsource functions to or partner with, in certain limited situations where it's necessary for us to do so in order to provide our products and services and perform associated business activities.

These third parties assist us by performing functions such as data storage, client contact, archiving, auditing, professional advisory, banking, data processing, marketing and advertising, data analysis, business intelligence, website and technology services. They may also provide products and services that integrate with or complement our solutions. For some of our products and services, we partner with government tax departments to file tax information on your behalf. Some of those third parties that we share information with may be located outside of Australia, in Hong Kong, United Arab Emirates, and Sweden. We may also disclose personal information, particularly of employees, as part of personnel management and reporting to regional operations in Singapore, and head office in Sweden.

Any such transfer, however, does not change any of our commitments to safeguard your personal information under this policy.

## 8. Use and disclosure of personal information

Our policy is only to use personal information for the purpose which was either specified or reasonably apparent at the time when the information was collected. We may also use or disclose the information collected for any other related purpose for which the individual would reasonably expect it to be used.


We will not use personal information for the purpose of direct marketing without an individual's express or inferred consent and only where we have provided a simple means by which the individual may easily request not to receive direct marketing communications from us (and the individual has not made such a request). Note that the Spam Act and Do Not Call Register Act apply.

If we wish to use or disclose the personal information in other circumstances, we need to obtain the individual's consent to do so.

In general, Securitas uses personal information for the following purposes:

- providing products or services that have been requested;
- communicating with the individual;
- assessing the creditworthiness of prospective customers;
- helping Securitas manage and enhance its products and services, including analysing customer feedback and future customer needs;
- providing ongoing information about Securitas products and services to individuals

that Securitas believes may be interested;

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- complying with regulatory and legal obligations; or
- recruiting employees and engaging contractors.

## 9. Storage and security of your personal information

We hold your personal information in paper-based or electronic files. We have put in place safeguards to protect the personal information we hold from misuse, interference and loss, and unauthorised access, modification or disclosure. This includes a range of systems and communication security measures, as well as the secure storage of hard copy documents. In addition, access to your personal information will be restricted to those properly authorised to have access.

We will take such steps as are reasonable to ensure that overseas recipients of an individual's personal information comply with the APPs in relation to that information. Where that is not the case, we will expressly advise the individual that, if he or she consents to the disclosure of their personal information to an overseas recipient, it may not be covered by the APPs. Such advice will be made before we obtain any such consent and, if consent is not given, disclosure will not be made to that overseas recipient unless Securitas is otherwise permitted to do so on other grounds as set out in APP 8. If the individual consents to the disclosure to an overseas recipient and they handle the personal information in breach of the APPs: we will not be accountable under the Privacy Act; and the individual will not be able to seek redress under the Privacy Act; and individuals should be aware that the overseas recipient may be subject to a foreign law that could compel the disclosure of personal information to a third party, such as an overseas authority.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used in accordance with this policy.

## 10. How to access or correct your personal information

We take reasonable steps to ensure that the information we hold about you is accurate, up-to date, complete and relevant when we use it or disclose it. You should contact us if you think your personal information is wrong.


If you have a question about this Privacy Policy or want to access or otherwise correct your personal information you can contact us:

In Australia by:

- phoning (03) 9629 1933;
- writing to The Privacy Officer, Securitas Australia, 4, 349-351 Flinders Lane, Melbourne, Victoria 3000
- sending an email to [australia@securitas-australia.com.au](mailto:australia@securitas-australia.com.au)

A request for access needs to include a full description of the personal information requested. If you request information over the phone, we will ask you identity-related questions so we can verify your identity.

Your request for access to your personal information will be documented, as will details of the request and the identity of the Securitas employee who gave it to you.

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You have rights to access your information and correct it if it is inaccurate, out-of-date or incomplete. If you believe that the information we hold about you is inaccurate, out-of date, incomplete, irrelevant or misleading, you can request its correction. If we are satisfied that the information needs to be corrected, we will take reasonable steps to ensure that information is corrected and notify you of the correction. If we correct your information and it is information we have provided to others, we will notify them of the correction where we are required to do so by the Privacy Act.

There may be circumstances in which we may have to refuse a request for correction. In such a case you can request that we include a statement with that personal information that you made a request for correction.

You will not be charged for accessing or correcting your information. You may be charged for reasonable costs incurred by us in the processing of, and response to, your access request, including photocopying, supplying written reports, administration and postage.

#### **11. How we will respond to your request**

We will acknowledge receipt of your request within 5 working days of receiving your request. We will do our best to deal with your request within 10 working days. If we cannot help with your request, you will receive a written explanation as to why and details of what you can do to take the matter further if you are not satisfied with our response.

#### **12. Do you want to contact us anonymously?**

You can certainly contact us anonymously. If you choose not to be identified, however, we are limited in our ability to provide you with the services or information you require.

#### **13. Can you complain about a breach of privacy?**

If you want to complain about a privacy breach, you can contact us:

In Australia by:

- phoning (03) 96291933;
- writing to The Privacy Officer, Securitas Australia, 4, 349-351 Flinders Lane, Melbourne VIC 3000
- sending an email to [australia@securitas-australia.com.au](mailto:australia@securitas-australia.com.au)

We will do our best to resolve your complaint as quickly as possible. If you are not satisfied with the result of your complaint to us, you can refer your complaint:


In Australia, to the:

Office of the Australian Information Commissioner

- Phone: 1300 363 992
- Post: GPO Box 5218, Sydney NSW 2001
- Online: [oaic.gov.au](http://oaic.gov.au) (Privacy Complaint Form)

#### **14. Need further information?**

For more information about privacy in general, you can visit (as applicable) the:

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- Office of the Australian Information Commissioner's website at [oaic.gov.au](http://oaic.gov.au); and

### 15. Updating our Privacy Policy

We may review, amend or revise our Privacy Policy and the way we handle personal information from time to time. We will distribute the updated privacy policy and its terms will take effect from the date of posting. You can also get a copy of the most current version of this Policy by either emailing or writing to the Privacy Officer using the contact details set out below

In Australia by:

- phoning (03) 96291933;
- writing to The Privacy Officer, Securitas Australia, 4, 349-351 Flinders Lane, Melbourne VIC 3000
- sending an email to [australia@securitas-australia.com.au](mailto:australia@securitas-australia.com.au)