

## CGPP0072 PRIVACY POLICY

### PURPOSE

The LaManna Premier Group (LPG) is committed to complying with applicable privacy laws, including the Privacy Act 1988 (Privacy Act), which set clear standards relating to the collection, storage, use and disclosure of any personal information obtained as part of LPG business operations.

LPG recognises the importance of privacy and respects our customers' and other individuals' right to privacy of their personal information. LPG has policies and procedures to ensure that all personal information is handled by LPG in accordance with the applicable privacy laws.

### SCOPE

This Privacy Policy sets out:

- general policies related to the management of personal information;
- the type of personal information collected and purposes for collection;
- how the information is used, stored and disclosed;
- how the information can be accessed.

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### POLICY

#### 1. Collection of Personal Information

Personal information collected by LPG is confidential. The purpose of collecting personal information is to provide the best products or services and to operate our business. LPG collects personal information from a range of individuals, including customers, employees, contractors, agents and other associates. Personal information that needs to be collected may include an individual's name, address, telephone number, email address or any other personal information that the individual provides.

Personal information may be collected from forms provided by LPG and completed by the individual, in face-to-face meetings, email messages, telephone conversations, or from third parties. When an individual contacts LPG, a record of that contact may be maintained. Generally, an individual has no obligation to provide any information requested by LPG. However, if an individual chooses to withhold the requested information, LPG may not be able to provide products and services that depend on the collection of this information (particularly where our collection of this information is required by law).

#### 2. Employee Records

The handling of your personal information by LPG, a private sector employer, is exempt from the Privacy Act if it is directly related to your current or former employment relationship and an employee record relating to you. This means that LPG, as a private sector employer, does not need to comply with the Australian Privacy Principles (APPs) in the Privacy Act when it handles current and past employee records for information that is directly related to the employment

relationship. This also means that an employer does not have to grant you access to your employee records under the Privacy Act.

Workplace laws require a range of information to be collected and recorded for each employee and enable requests to be made for access to those records. For further information about accessing employee records under workplace laws, please contact the General Manager of Human Resources at 103 – 107 Hyde Street, Footscray, Victoria 3011 or by telephone on +61 3 9687 7725.

### **3. How is Personal Information Used and Disclosed?**

Some examples of when personal information is required to be collected for use and disclosure relate to supplier enquiries, for website registration, for providing customers with products and services, and for customer complaint handling. LPG may use personal information to advise of new products and services or special offers or promotions. LPG agents or contractors from time to time may also use personal information to provide information about products and services that they may offer from time to time. If at any time you do not wish to receive such information from LPG or its agents, you can opt out of receiving such information or you may remove your name from our list by calling us on +61 3 9687 7725. Please allow 5 business days for this request to be processed.

During the course of business, LPG may use a range of service providers to help maximise the quality and efficiency of LPG services and business operations. This means that individuals and organisations outside of LPG may sometimes have access to personal information held by LPG and may use this on behalf of LPG. LPG require service providers to adhere to strict privacy guidelines and not to keep this information or use it for any unauthorised purpose.

LPG may also share non-personal, de-identified and aggregated information for research or promotional purposes. Under no circumstances will LPG or any related entities sell personal information to marketing agencies without consent of the individual.

LPG do not routinely disclose personal information to any third parties. LPG will not use or disclose any personal information without consent unless:

- required or authorised by law;
- it is permitted by this Privacy Policy;
- we believe this is necessary to provide the products or services requested;
- it is necessary to implement LPG terms of service;
- it is necessary to protect the rights, property or personal safety of a LPG employee, another customer, or any member of the public or LPG; or
- some or all of the assets and operations of the business are or may be transferred to another party by way of sale of some or all of LPG business.

### **4. The Storage of Information**

LPG will endeavour to take all reasonable steps to secure any personal information held and keep this information accurate and up-to-date. Personal information may be stored in hard copy or electronically (including on secure servers in controlled facilities). LPG has security processes in place to protect personal information from misuse, loss or unauthorised access, modification or disclosure. The types of measures taken vary with the type of information and

how it is collected and stored. LPG employees, agents, contractors and data processors are required to respect the confidentiality of any personal information held by LPG.

Please note that LPG may use external data facilities to process or back-up its information and, as a result, may transfer personal information to other facilities for storage. However, this does not change any LPG's commitment to safeguard individual privacy.

### **5. Access to and Correction of Information**

Upon written request, LPG will provide access to an individual's personal information held by LPG (except in limited circumstances in which it is permitted by law for us to withhold this information). To access records of personal information, a request will need to be submitted in writing, at 103 – 107 Hyde Street, Footscray, Victoria 3011. LPG will require proof of identity and will usually be able to respond to such requests within 14 days.

LPG will take reasonable steps to correct any information which is found to be inaccurate, incomplete or out-of-date. If an individual requires personal information that is inaccurate, incomplete or out-of-date to be changed or deleted, a request by the individual will need to be sent to LPG and LPG will take all reasonable steps to delete it unless we need to keep it for legal reasons.

### **6. Queries, Future Changes and More Information**

If LPG becomes aware of any ongoing queries or concerns regarding LPG privacy practices, the issue will be addressed immediately. For all further queries relating to the LPG Privacy Policy, contact the General Manager of Human Resources at 103 – 107 Hyde Street, Footscray, Victoria 3011 or by telephone on +61 3 9687 7725. All queries will be responded to in writing and within a reasonable timeframe.

LPG reserves the right to update and change its Privacy Policy at any time and will post an updated version of the policy on its websites. The amended Privacy Policy will apply regardless of whether specific notice of any change has been issued.

### **7. More Information**

More information about privacy law is available from the Office of the Australian Information Commissioner at <http://www.oaic.gov.au/>.