

PRIVACY POLICY- INTERNAL (CGPP0005)

Purpose

LaManna Premier Group (LPG), together with all members of the LPG group of companies, are committed to providing the highest levels of customer service and endeavours to interact with all stakeholders including our staff, suppliers, customers and the public in an honest, courteous, and professional manner.

We respect the privacy of the personal information that is provided to us and manage that information in accordance with relevant laws, including the *Privacy Act 1988* (Cth) ("the Act") and the Australian Privacy Principles (**APPs**). LPG is committed to the protection of personal privacy and supports a work environment that abides by the Act and in particular the APPs.

This Privacy Policy describes how we treat any personal information (including sensitive information) that we receive about LPG employees, directors, or contractors. The objective of this policy is to provide a fair, consistent and transparent guideline for handling personal information in a professional and ethical work environment that will ensure compliance with the Act. This policy does not limit or exclude any of your rights under the Act.

Key definitions

"Personal information" is information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

"Sensitive information" is personal information that includes information or an opinion about an individual's racial or ethnic origin, political opinions or associations, religious or philosophical beliefs, trade union membership or associations, sexual orientation or practices, criminal record, health or genetic information or some aspects of biometric information.

Scope

This policy applies to LPG staff, contractors, and consultants of its controlled entities, being an entity where LPG holds over 50% of the share capital. Where LPG is involved in a non-controlled joint venture or other similar arrangement where it does not hold a controlling interest, LPG will make available its policy and request that the non-controlled entity adopt the key principles as part of its own policy framework.

Policy

1. What information do we collect?

LPG will collect and use personal information for lawful and relevant purposes only.

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 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.

The Privacy Act only applies to an employee record if the information is used for a purpose not directly related to the employment relationship.

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 Human Resources Department, hrsupport@lpgroup.com.au, 103-107 Hyde Street Footscray, Victoria 3011, +613 9687 7725.

The collection of personal information shall be for purposes connected with LPG's business operations, your engagement as an employee, director, or contractor, or where required by law. Such personal information may include:

- identifying information, such as your name, contact details, date of birth and home address
- name and details of emergency contacts
- resumes, educational qualifications, and employment history
- letters of offer, and employment contracts
- health information provided directly, or through other channels
- banking, tax, and superannuation details
- monitoring the use of LPG electronic devices and LPG email accounts
- surveillance footage (for safety and security purposes)
- information about your occupation and suitability for the role or relationship (including information provided during an employment or contractor application, such as criminal history); and
- information about your performance in the role or relationship, including results of drug testing (if applicable).

As a general principle, we will only collect personal information that is needed for the particular purpose the information is provided for. The personal information that LPG collects is held in accordance with the Act (in particular, the APPs).

2. Sources and manner of collection of personal information

Subject to various limitations and exceptions as provided in the Act and APPs, personal information will be collected directly from you, including through the following means:

- when you first apply to become an employee, director, or contractor
- when you first commence an employment relationship with LPG or become a contractor of LPG
- during your interactions and correspondence with LPG
- through surveillance devices that may be situated on LPG's premises; and
- while conducting employee performance reviews or surveys.

We generally do not collect sensitive information however may collect it from time to time (e.g., we may collect health information for sick leave purposes). When we do so we will collect it directly from you or where you give express consent to us collecting it from a third party.

We may collect personal information about you from others where it is unreasonable or impracticable to collect personal information only from you. This will depend on the circumstances of the particular case. Considerations that may be relevant include:

- whether you would reasonably expect personal information about you to be collected directly from you or from another source
- the sensitivity of the personal information being collected
- whether direct collection would jeopardise the purpose of collection or the integrity of the personal information collected
- any privacy risk if the information is collected from another source
- where the time and cost involved of collecting directly from you is excessively burdensome.

Examples of exemptions or where it may be unreasonable or impracticable to collect personal

information only from you include:

- the information is publicly available
- where you are under investigation
- an official document that is mailed to you is "returned to the sender", we may seek your updated contact details from another source
- from suppliers of services to us (e.g., recruitment firms) or
- information listed and available on social media channels, such as Facebook or LinkedIn.
- The Act also provides for certain other limitations and exceptions.

Where LPG collects information directly from you, if required or where LPG considers it appropriate and necessary, it will take such additional reasonable steps as are required to ensure that you are aware:

- that the information is being collected
- of the purpose for which the information is being collected
- of the intended recipient
- of details of who is collecting and holding the information
- of details of any particular law under which the information is being collected if applicable, and whether the provision of the information is voluntary or mandatory
- of the consequences of failing to provide all or any part of the information; and
- of the rights to access and correction of personal information as provided by the APPs.

LPG will only collect personal information using fair and lawful means, that is, it does not involve intimidation or deception, and is not unreasonably intrusive.

3. Where is this information stored?

This information is stored either in hard copy/paper files or on our electronic databases. LPG takes reasonable steps to ensure that all personal information is stored securely and protected from misuse, loss and unauthorised access, modification, or disclosure. Only appropriate people within LPG are permitted to access, modify, or disclose this information. LPG operates various security systems to minimise the risk of misuse of electronically or manually stored information.

Access to information is on an as-required and need-to-know basis. Personal information may be stored for up to seven years, or longer periods, if required to comply with LPG's obligations, legal or otherwise. This time period commences from the date of the employee or contractor leaving LPG. After this time period LPG takes reasonable steps to securely destroy or delete the records where they are no longer required.

We may store personal information using a third-party service provider. LPG's agreements with these service providers prohibit the information that LPG collects from individuals being used by the service providers in a way that LPG has not authorised.

4. What do we use personal information for?

We may use your personal information for a number of purposes connected with our business, including in the following ways:

- for the purpose for which the information was specifically provided and managing that relationship
- to verify your identity
- to assist you to apply to become an employee, director or contractor
- to interact and communicate with you
- to maintain and administer our records
- to deal with your requests, enquiries or complaints

- to comply with our legal obligations
- to assess your work, suitability or performance
- to manage and meet obligations in relation to our employees and contractors
- to perform drug and alcohol search testing, in accordance with our relevant policies; and
- for other purposes for which you have given permission, or which is required or allowed by law.

We may use surveillance footage and monitor the use of LPG electronic devices and systems, including LPG email accounts and instant messaging platforms, if required, for detecting and deterring inappropriate or criminal behaviour at our premises, and monitoring the safety and security of our customers, suppliers, staff, and property.

Prior to using any personal information, LPG will take reasonable steps to ensure that, having regard to the purpose for which the information is proposed to be used, it is accurate, up to date, complete, relevant and not misleading. If any of your personal information changes, such as your address, contact details, emergency contact details, or bank account and tax details, please advise your manager promptly.

5. Disclosure of information

We agree not to distribute or otherwise provide to third parties any information you supply to LPG except as outlined in this policy, or where you consent. We may use or disclose personal information for a secondary purpose where it is reasonable to expect LPG to use or disclose the information for that secondary purpose, and:

- if the information is sensitive information, the secondary purpose is directly related to the primary purpose of collection, or
- if the information is not sensitive information, the secondary purpose is related to the primary purpose of collection.

Any information you supply to us may be shared with and used by the following, where relevant to them:

- medical and other insurers
- superannuation fund trustees and administrators
- government agencies requiring such information (e.g., the ATO)
- related bodies corporate [refer section 13B of the Privacy Act]
- our employees, directors, contractors, suppliers, and agents, where relevant to their role with us
- our advisors and service providers (we require service providers to adhere to strict privacy guidelines and not to keep this information or use it for any unauthorised purpose)
- a business that supports our services and products (e.g., a business that hosts or maintains our IT system, data centre or website)
- service providers commissioned to protect the rights, property or safety of LPG or others
- any court, tribunal, or regulatory authority where disclosure is required or allowed by law; or
- any other person authorised by you or by law.

We may from time to time transfer personal information to third parties outlined above who are located outside of Australia. If we do so, we will take reasonable steps to ensure your personal information will be protected by comparable safeguards to those in the APPs. If your personal information will not be protected by comparable safeguards to those in the APPs, we will tell you that this is the case, and only transfer your personal information with your consent.

6. Unique identifiers

A unique identifier may be assigned to you where necessary for the efficient management of our

business and relationships (e.g., a payroll number). LPG will take steps to ensure that the risk of misuse of any unique identifiers by any person is minimised.

7. Review, correction, or breach of privacy

In accordance with your rights under and subject to the Act, upon presentation of appropriate identification or authorisation, we will provide access to personal information we keep about you to determine what this information is and to correct the information if it is found to be inaccurate. Any request to undertake such a review should be made by contacting the Human Resources Department, using the details set out below. The right to access such information is subject to other provisions under the Act and APPs which may operate to modify, restrict, or decline such access. Generally, we do not deal with an anonymous or pseudonymous request for personal information.

Similarly, if you feel your privacy has been interfered with, as defined in the Act, please contact LPG's Human Resources Department in the first instance. The Act provides further avenues of action/review if you feel your complaint has not been addressed by LPG.

If a privacy breach occurs which has caused or may cause serious harm to you, LPG will notify you of this as soon as practicable, subject to any exceptions in the Act.

LPG's Chief People & Communications Officer has the role of ensuring that LPG complies with the APPs, addressing any enquiries about privacy and personal information made under the Act and working with the Privacy Commissioner as required on any complaints about privacy.

8. Policy Definitions and Explanations

This policy document is not a transcript of the Act but a statement of policy by LPG as to how it will work to comply with the Act in respect of its employees and contractors. For more information about the Act and the APPs, you can:

- Visit the Australian Information Commissioner and Privacy Commissioner's website at <https://www.oaic.gov.au>
- Contact the office of the Privacy Commissioner on 1300 363 992 or at <https://www.oaic.gov.au/about-us/contact-us/>

9. Contact information

For any questions, comments, or concerns regarding this Privacy Policy, please contact, the Human Resources Department, hrsupport@lpgroup.com.au, 103-107 Hyde Street Footscray, Victoria 3011, +613 9687 7725.

10. Review of this Policy

This Policy will be reviewed at least every 2 years by the Audit Committee in consultation with the Chief Executive. LPG may revise and update this Privacy Policy from time to time. This Privacy Policy was issued/revised/adopted/approved as at the issue date detailed below. Any change applies from the date LPG posts the amended version to the intranet.

11. Approval

This Policy and Procedure was reviewed by the Audit Committee and approved by the Board on February 2022.

12. Availability of the Policy and Related Documents

This Policy will be made available on the LPG L:\Sharepoint.