

## Purpose

This policy applies to the collection, use, storage, disclosure and handling of personal information by Lake Maintenance and its associated entities (collectively “Lake Maintenance”, “we”, “our” or “us”).

Lake Maintenance is committed to protecting and maintaining the privacy, accuracy and security of personal information of individuals and is bound by the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (the “Act”). We will only collect, use or disclose personal information in accordance with the Act and this policy.

## Collection

Any personal information Lake Maintenance collects is for the purpose of conducting our business. Such information is collected in various ways, including directly from you such as when you provide information to us, apply for a position of employment with us, contact and correspond with us or use our website (including via cookies). We may also collect such information from publicly available sources or, with your consent, from third parties subject to any relevant requirements of the Act.

The nature of personal information we collect varies depending on the business purpose for which it is obtained, and may generally include personal information of our employees, subcontractors, clients, property residents and third party businesses. More specifically, such information may include the following:

- your name, physical address, mailing address, telephone and other contact details, sources of which may include recruitment consultants, work orders, account activity and payment history;
- company details and credit and financial information relating to subcontractors and other businesses that deal with us;
- electronic device information (brand, type, ID, geo-location etc), which is recorded in connection with the supply of our services, including to monitor performance and quality assurance;
- GPS tracking information from our fleet of GPS-equipped vehicles, which is recorded for employee safety, work scheduling, security of company assets, insurance and efficiency purposes; and
- your internet browsing activity when you access our website, including time, date, pages browsed, IP address, information you download or upload etc.

## Use & Disclosure

For our business purposes, Lake Maintenance may use or disclose your personal information:

- to consider and/or conduct business dealings with you;
- for recruitment and/or employment purposes;
- for the provision of services to or for you; and/or
- to meet legal and/or regulatory requirements.

We may also use and disclose your personal information for a secondary purpose that is related to a purpose for which it was collected where you would reasonably expect us to use or disclose your personal information for that secondary purpose.

# PRIVACY POLICY

Other instances when we may use and disclose your personal information include:

- where you have expressly or impliedly consented to the use or disclosure;
- where reasonably necessary with third party service providers we use in conducting our business (such as for billing and debt recovery, submission of tenders, obtaining Police clearances and reference checking), subject to confidentiality provisions as we deem appropriate;
- in confidence, with our advisers and insurers;
- where the use or disclosure is authorised or required by or under an Australian law or Court/Tribunal order;
- to prevent a serious threat to a person's life, health or safety, or to public health or safety; and/or
- to prevent suspected unlawful activity or serious misconduct.

Some of the third parties to whom we disclose your personal information may be located outside Australia, and the countries in which these third parties are located will depend on the circumstances. However, in the course of our ordinary business operations, we commonly disclose personal information to such third parties located in the Philippines.

All other use and disclosure of personal information is within our internal departments and employed staff. Lake Maintenance do not share, trade or sell information for direct marketing purposes.

## Storage & Security

Lake Maintenance has various systems and processes in place to ensure the security and safety of personal information we collect and hold. The privacy of such information is treated with respect and it is only accessed when necessary and for the business-related purpose for which it is held.

Our storage and security measures including the following:

- physical security – information is stored in locked and secured filing cabinets and storage areas;
- computer and network security – security settings and permissions are applied to data stored on hard drives, disks and tapes, and across our computer network, and computers utilise appropriate security software;
- confidentiality agreements – employees, subcontractors and other third parties that deal with us are required to be bound by appropriate confidentiality provisions;
- audit and monitoring – where necessary for security and risk management, we review and monitor staff access to personal information; and
- HR-specific measures – personal information obtained for recruitment and employment purposes only is securely stored and accessed only by our Human Resources Department for recruitment purposes and, for unsuccessful candidates, personal information will either be destroyed immediately or securely stored for a period of up to six months.

Notwithstanding the above and that Lake Maintenance takes all reasonable steps to keep personal information we hold secure, to the extent permitted by law we exclude all liability (including in negligence) for the consequences of any unauthorised access to your personal information. Please notify us immediately if you become aware of any breach of security.

## Access & Corrections

You have a right to request access to or correction of your personal information that we hold, provided that we may require you to establish your identity.

# PRIVACY POLICY

If you wish to access, correct or update any personal information we may hold about you, please contact us as set out below, and we will respond within a reasonable timeframe. However, we may refuse access where permitted under the Act, including where:

- giving access would be unlawful;
- denying access is required or authorised by or under an Australian law or a Court/Tribunal order;
- we reasonably believe that access poses a serious threat to the life, health or safety of any individual, or to public health or public safety;
- giving access would have an unreasonable impact on the privacy of other individuals;
- giving access would reveal evaluative information generated in connection with a commercially sensitive decision-making process;
- giving access would prejudice negotiations with you;
- the information relates to existing or anticipated legal proceedings between the organisation and you, and would not be accessible by the process of discovery in those proceedings;
- giving access would be likely to prejudice the taking of appropriate action in relation to suspected unlawful activity or serious misconduct; or
- the request for access is frivolous or vexatious.

## Complaints

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe that we have not complied with this policy or the Act, please contact us in writing and provide as much detail as possible. Our Privacy Officer will then:

- investigate the complaint;
- determine whether a breach has occurred;
- determine what action, if any, to take; and
- report the outcome of the investigation to you.

We will take any privacy complaint seriously and aim to resolve the complaint in a reasonable time (usually within 30 days). We request that you cooperate with us during this process and provide us with relevant information we may require.

We expect our procedures will deal fairly and promptly with any complaint. However, if you remain dissatisfied, you can make a formal written complaint with the Office of the Australian Information Commissioner, whose contact details are as follows:

- Phone: 1300 363 992
- Postal address: Director of Compliance, Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001
- Website: [www.oaic.gov.au](http://www.oaic.gov.au)

## Breach

In the event of any loss, unauthorised access or disclosure of your personal information, Lake Maintenance will investigate and, if warranted, notify you of the breach.

Any breach of this policy by our staff or subcontractors will result in appropriate disciplinary and enforcement action, which may include summary dismissal of employees and termination of subcontract agreements.

## Variations

Lake Maintenance will review this policy biennially however may change its contents with the written approval of the Chief Executive Officer from time to time, and it is available at all times on our website. By continuing to deal with us, you accept this policy as it applies from time to time.

## Website

Lake Maintenance may collect information about you when you use our website through the use of cookies, which facilitate access to and use of the site and allow us to track usage patterns to help us improve the website. If you do not want information collected through the use of cookies, you should adjust your internet browser settings to accordingly, though this may affect usability of the website.

Our website may contain links to third parties, which are provided for convenience only and we take no responsibility for the privacy practices of such third parties. We encourage you to check their privacy policies before accessing them or disclosing any personal information to or through them.

## Lake Maintenance Contact Details

Please direct any privacy-related issues or queries to us as follows:

- Position and title: Privacy Officer
- Postal address: Privacy Officer, Unit 2A/8 Reliance Drive, Tuggerah NSW 2259
- Email address: PrivacyOfficer@lakemaint.com.au

A handwritten signature in blue ink, appearing to read 'R. Selinger'.