

## PRIVACY POLICY - GENERAL

### Background

Service Stream Limited and its subsidiaries (“**Service Stream**”, “**we**”, “**us**” or “**our**”) consider that the responsible handling of personal information is a key aspect of good corporate governance and we are strongly committed to protecting an individual's right to privacy. Service Stream is subject to the Privacy Act 1988 (Cth) (“**Privacy Act**”) and the Australian Privacy Principles (“**APPs**”) (collectively “**Privacy Laws**”), which establish protective standards for the management of personal information.

This policy describes the way that Service Stream collects, holds and discloses personal information and the controls it has imposed to ensure compliance with the Privacy Laws. Service Stream also has a separate privacy policy that describes the way it collects, holds and discloses personal information relating specifically to its large subcontractor workforce. It can be accessed here.

In this policy the terms "personal Information" and "sensitive information" bear their meanings defined in the Privacy Laws, but in substance, "personal information" refers to information about or related to an identifiable individual, while "sensitive information" is personal information about the relevant individual which is subject to additional controls. It includes details such as ethnic origin, health information, political and religious affiliations, sexual preferences and criminal histories.

### 2. The information we collect

During the course of carrying on our business, we may collect personal information (including sensitive information) about individuals, including employees (part, full time, casual, temporary or contract), independent contractors, landowners (including property interest holders), representatives of the clients and suppliers we deal with and the customers or potential customers of our clients (“you”). The kind of information we collect depends on the purpose for which it is collected.

#### *Employees*

In relation to our employees we collect name and home contact details, including addresses, phone numbers and email addresses. We collect documentation to validate working rights such as copies of passports, birth certificates or visas. We may also collect details of their next of kin for emergency contact purposes, and taxation, banking and superannuation details. We collect Tax File Numbers of employees as an authorised recipient in accordance with The Privacy (Tax File Number) Rule 2015.

Where relevant to an employee’s duties for us, we may also collect sensitive information such as:

- matters to do with health
- reports from medical practitioners
- police checks
- membership of a professional or trade association

#### *Client and Supplier Representatives*

For clients’ and suppliers’ representatives, we typically collect name, telephone and email contact details.

#### *Client’s customers*

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Where we have been engaged by a client to provide services to that client's customers, or potential customers, we may collect personal information about those customers and potential customers. In addition to name, address and contact details that personal information may include other details relevant to the services being provided. For example, part of our business involves providing call centre services as agent for our clients. In performing those services we may collect credit card information from you to allow our client to provide you with your requested product or service.

### 3. How we collect information

#### *How personal information is collected*

Wherever reasonably possible, we collect personal information from the person to whom it relates. That is not always possible or appropriate and we do collect and use personal information from publicly available sources and from third parties. Our business involves providing call centre, meter reading and other customer services on behalf of various service providers. In the performance of those services we are frequently provided with personal information which has been collected by our clients and which we require in order to provide the services we have been engaged to provide.

Where we obtain personal information from a third party, including any of our clients, we are careful to seek confirmation from those providing us with the information that it was acquired in accordance with the requirements of the Privacy Laws, that they are entitled to provide it to us and that they are able to authorise us to use it for the purposes for which they are supplying it.

If the information is sensitive, such as a police check, we will take steps to confirm that the individual to whom it relates has provided consent to our collection and primary use of the information.

#### *How personal information is held*

Employee information is saved in locked cabinets and a secure internal drive which can only be accessed by authorised Human Resources representatives.

Depending on the client's requirements and the service we are engaged to provide on behalf of that client, personal information about customers and potential customers of our clients may be held in either the client's IT system, or an IT system provided by one of our service providers. In both cases the IT systems are protected by reasonable security measures.

#### *Using pseudonyms*

So far as is reasonably practicable we are happy to deal with you anonymously or under a pseudonym, if you prefer. Generally we are happy to provide general information about our products and services without requiring you to provide contact details.

If you do deal with us under a pseudonym, we would of course prefer to know that it is a pseudonym, so as to avoid collecting inaccurate information. Similarly, if you have provided us with your contact details, and those details subsequently change, we would appreciate you informing us of the change so that we can ensure our records are kept up to date.

### 4. How we use the information we collect

Service Stream uses the personal information it collects:

- (a) to communicate with its clients and provide its services to clients and potential clients;
- (b) to enable Service Stream to provide services on behalf of its clients to the individuals to

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whom the information relates (for example, to schedule appointments for internet connections or meter exchanges); and

- (c) to assess job applications, where the information relates to a job applicant.

Where Service Stream contacts you on behalf of a client and collects information relevant to the provision of services by Service Stream's client to you, the personal information collected will be used solely in relation to the provision of services to you by or on behalf of the relevant client. In such circumstances Service Stream collects the information as agent of the relevant Service Stream client and the use of that information may be subject to the client's privacy policy. In all such circumstances, Service Stream will clearly identify to you the client for whom it is collecting any personal information.

We do not sell personal information to third parties.

## 5. Disclosure of personal information

Service Stream engages third parties to act on our behalf, both in the services we provide on behalf of our clients (for example, subcontractors who perform in-field works such as meter exchanges or internet connections) and in our corporate support, warehouse and supply-chain functions (for example, information technology suppliers, data centres, debt collection agencies, mailing and logistics providers and professional advisors). We may disclose personal information we have collected to these third parties for the purposes of their work and, equally, they may provide us with personal information they have collected from you in the course of providing the relevant products or services. In all cases where the information was collected on our behalf by those service providers and subcontractors, we will ensure that all service providers and subcontractors we engage are subject to the APPs and/or strict contractual controls, wherever possible.

Where we collect personal information from you as agent on behalf of a third party, we will disclose that personal information to that third party.

In relation to Service Stream employees, we disclose taxation, banking and superannuation details to the ATO and your nominated superannuation provider. On occasion we may get confirmation of employment requests, which we will inform you before releasing your information to the requesting person.

If Service Stream intends to use or disclose any personal information it collects from you in any other manner than those contemplated in sections 4 or 5 of this policy, we will inform you unless the other use or disclosure is related to the original use or disclosure. Otherwise Service Stream will only disclose the personal information it collects where required or authorised to do so by Australian law.

## 6. Overseas disclosures

Service Stream is not likely to disclose personal information of the types described in section 2 of this policy to overseas recipients.

Service Stream will not disclose any personal information it collects to any person located outside Australia unless:

- (a) we have obtained the consent of the person to whom the information relates to that disclosure;
- (b) the recipient of the information is subject to a law or binding scheme, that provides at least a substantially similar level of protection in respect of the use of personal information to that available under Australian law and the person to whom the information relates is directly able to enforce their

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rights in respect of that protection; or

(c) the disclosure is otherwise in compliance with our obligations under the Privacy Act.

## 7. Security and Access

We take reasonable steps to ensure all personal information we hold is kept secure from unauthorised access, modification or disclosure. Service Stream is required to notify the Australian Information Commissioner and all affected individuals if it experiences an eligible data breach that is likely to result in serious harm. If you see or experience a data breach involving a Service Stream employee, subcontractor or service provider, please report it without delay to Service Stream's Privacy Officer at **privacyofficer@servicestream.com.au** or by post at: **The Privacy Officer, Service Stream Limited, PO Box 14570, Melbourne Vic 8001.**

If you wish to obtain a copy of any personal information we hold which relates to you, request that we correct that information, request that we delete that information or make a complaint relating to our collection or use of personal information, please contact our Privacy Officer using the details provided above. Please note that we will require you to adequately identify yourself when requesting a copy of your personal information. We aim to respond to any complaint within 30 days and act reasonably in resolving all complaints.

If you are unsatisfied with the response from Service Stream, you may wish to address your complaint to the Australian Information Commissioner at: Office of Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001, email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

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