

1. PURPOSE

Kimbriki Environmental Enterprises Pty Ltd (**KEE**) (ABN 65 136 789 261), is committed to complying with its obligations under the *Privacy Act 1988* (Cth) (the '**Privacy Act**') including the Australian Privacy Principles set out in the Privacy Act (the '**APPs**'), and other applicable data privacy laws.

In this Privacy Policy, '**we**', '**us**' and '**our**' refers to Kimbriki Environmental Enterprises and '**you**' refers to any individual about whom we collect personal information.

KEE is owned by Northern Beaches Council and Mosman Municipal Council. This Privacy Policy only applies to the handling of Personal Information by KEE and does not apply to the Northern Beaches Council or Mosman Municipal Council. These Councils have separate Privacy Policies as they are subject to different privacy obligations.

2. WHO THIS POLICY APPLIES TO

This Privacy Policy applies to all Personal Information that KEE collects, uses, discloses, stores and handles, including Personal Information collected when you visit the Kimbriki Resource Recovery Centre and through our website.

In this policy, '**Personal Information**' means information or an opinion about an identified individual, or an individual who is reasonably identifiable, directly or indirectly, and any other information that is deemed personal information under applicable law.

Other terms may also apply to you and the Personal Information we hold about you. For example, if you are employed with us you may have specific privacy terms in your employment contract with us.

Sometimes we will also provide you with a privacy collection statement at the time we collect Personal Information from you. This privacy collection statement may include additional terms.

3. COLLECTION OF PERSONAL INFORMATION

3.1 How Personal Information is collected by KEE

KEE provides a waste disposal and recycling service to its customers, who drop off waste and recycling to the KEE Resource Recovery Centre (**Centre**).

We collect most Personal Information directly from you. For example, we will collect your Personal Information from you when you:

- do business with us as a customer, including when you visit our Centre to dispose of or recycle waste, or otherwise use our services;
- apply for a payment account with us (including a credit account);
- make an enquiry via telephone or email;
- register on our websites, such as when you make a booking to visit the Eco House & Garden Workshop;



- interact with our sites, services, content and advertising;
- submit your resume for employment at KEE;
- apply for the Artist in Residency Program or other programs or workshops we may run;
- request information from KEE;
- communicate with us by filling out forms (including online forms), surveys, correspondence, chats, email, over the phone or when you share information with us through other social applications, online user-generated content and market research, face-to-face meetings and interviews; or
- provide your Personal Information to us in person, for example when visiting the Centre.

Sometimes we may collect Personal Information about you from other people or organisations. This may happen without your direct involvement. For example, we may collect Personal Information about you from:

- one of our other business partners, such as Concrete Recyclers Pty Ltd, WasteLocate, Lifeline, Paintback, NSW EPA, Australian Native Landscapes and Bikes 4 Life;
- the Northern Beaches Council or Mosman Municipal Council, such as for proof of residency for discount prices at the Resource Recovery Centre;
- any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract;
- any third-party social media platform such as LinkedIn or Google+ in connection with our recruitment and HR processes; or
- if you apply for a credit account with us, from credit providers and credit reporting bodies.

3.2 What kinds of Personal Information does KEE collect and hold?

KEE collects personal information about you directly from you and from other organisations we do business with, such as our suppliers, councils, contractors, job applicants and other contacts to understand and meet their needs, to conduct our activities and meet legal obligations. The kinds of Personal Information we collect will depend on the purpose(s) for which we are collecting it. For example, we may collect:

- your name
- e-mail address
- fax and telephone number
- mailing address
- age or date of birth
- employment details (such as work address and job title)
- position and contact telephone number
- credit information, including any late or outstanding payments you owe to us
- bank and other details if you are a supplier or employee



- your image when visit the Centre, through the use of closed-circuit television (**CCTV**) systems on KEE's premises
- vehicle registration (e.g. licence plate details) and video footage of your vehicle using CCTV as you pass through our weighbridges and our site generally
- comments, requests or feedback you submit by way of answering our service or complaints voicemail line
- statistical information about visitors to our website using web analytics and session recording technology provided by third party service providers such as Google Analytics. This includes your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from our sites, ad data, IP address and standard web log information
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries
- any additional information relating to you that you provide to us directly through our website, or indirectly through your use of our website or online presence or through other social applications, services, websites or accounts from which you permit us to collect information
- information you provide us through customer surveys
- other Personal Information that may be required in order to facilitate your dealings with us

If you do not provide certain requested Personal Information to KEE, KEE may not be able to provide you with access to KEE products and services or fulfil one or more of its functions and activities applicable to you.

Additional information on certain categories of Personal Information which KEE collects are set out below.

3.3 Personal Information relating to employees, applicants and contractors

When you apply for a job or position with us or become a contractor or vendor, we may collect certain Personal Information from you (including your name, address, contact details, working history, education history, qualifications, tax file number, tax information, banking information and relevant records checks) as part of the application or onboarding process.

This Privacy Policy does not apply to our acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act. Refer to IMS-POL-002 Workplace Privacy Policy.

4. USE AND DISCLOSURE OF PERSONAL INFORMATION

4.1 The purposes for which information is collected, used and disclosed

The purposes for which we usually collect, use and disclose Personal Information depends on the nature of your interaction with us, but may include the following purposes:

- to enable you to access and use our products and services if you are a customer or other business partner
- to enable our work in general, such as recording transactions, invoicing customers and paying suppliers, employees and contractors
- to manage our relationship with you
- as part of our relationship with the Northern Beaches and Mosman Municipal Councils
- to assess your credit application, service and manage any credit account, register any security interests and when necessary, undertake debt recovery action
- to operate, protect, improve and optimise our services, products, websites, business and our users' experience, such as to perform analytics, conduct research and training and for advertising and marketing
- to let you know about developments in our products, services and activities that might be useful to you
- to deliver our services, products, support and administrative messages, reminders, technical notices, updates, alerts, and information requested by you
- subject to possible limitations and qualifications set out in applicable laws, to send you marketing and promotional messages and other information and offers that may be of interest to you, including information sent by, or on behalf of, our business partners in which KEE thinks you might be interested, or which you have requested
- subject to possible limitations and qualifications set out in applicable laws, to administer contests, other promotional activities or educational events sponsored or managed by us or our business partners
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties
- to consider your employment application and where applicable, to carry out the employment relationship
- to respond to requests for information, feedback and other general inquiries about our products and services
- for quality assurance, security, monitoring, compliance and to ensure the safety of KEE's staff, premises and the public generally
- to innovate our delivery of products and services including our business systems, processes, outcomes, communication, website, engagement, and performance
- in the event of late payment or bankruptcy, to collect funds due to us



4.2 Direct marketing

We and/or our carefully selected business partners may send you direct marketing communications, information and offers about services and products that we think may interest you. This may take the form of emails, SMS, mail or other forms of communication. You may opt-out of receiving marketing communications from us by using the opt-out facilities provided in our communications (e.g. an unsubscribe link).

Where required by applicable law, we will only send you email or SMS marketing emails with your consent.

4.3 Disclosure of Personal Information

Subject to restrictions and conditions set out in applicable laws, we may disclose Personal Information for the purposes described in this Privacy Policy to:

- Northern Beaches Council and Mosman Municipal Council
- third party suppliers and service providers (including providers who assist us with training, website hosting or cloud storage, distribution of newsletters and other publications developed by KEE), or in connection with your employment application or providing our products and services to you)
- professional advisers, dealers and agents
- payment systems operators (e.g., merchants receiving card payments);
- our existing or potential business partners or other partners
- our sponsors or promoters of any competition that we conduct
- specific third parties authorised by you to receive information held by us
- credit reporting bodies and credit providers
- other persons, including government agencies, statutory or regulatory bodies, courts, tribunals, law enforcement agencies, arbitrators, mediators or conciliators, as required, authorised or permitted by law, including in connection with disputes or litigation
- where disclosure is necessary to prevent a threat to life, health, or safety, or where we are otherwise permitted by the Privacy Act.

4.4 Disclosure of Personal Information outside of Australia

Currently KEE stores all information in Australia and does not disclose any information to overseas entities.

Disclosures of Personal Information outside Australia will be carried out in compliance with applicable laws which may include obtaining consent or requiring compliance with applicable laws through contractual obligations.

5. SECURITY OF PERSONAL INFORMATION

We may hold your Personal Information in either electronic or hard copy form. We take reasonable steps to protect and secure your Personal Information from misuse, interference and



loss, as well as from unauthorised modification, access or disclosure. We use a number of appropriate physical, administrative, personnel and technical measures for such protection of your Personal Information including:

- limiting physical access to our premises
- limiting access to the information we collect about you (for instance, only those of our personnel who need your information to carry out our business activities are allowed access
- requiring any third-party providers to have acceptable security measures to keep personal information secure
- putting in place physical, electronic, and procedural safeguards in line with industry standards

If we no longer require your personal information and are not legally required or permitted to retain it, KEE will take reasonable steps to destroy or permanently de-identify the personal information.

6. PRIVACY AND DATA SECURITY ON OUR WEBSITES

6.1 Cookies

We may use 'cookies' or other similar tracking technologies on our websites that help us track your website usage and remember your preferences. A cookie is a small data file that can be used to track internet use. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. More information about cookies can generally be found in the "help" (or similar) section of your computer's internet browser.

At KEE, we primarily use cookies to help us understand how visitors' access and utilise our site. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Generally, this information cannot be used to identify particular individuals. However, in some circumstances it may include a visitor's internet protocol (IP) address, which could be linked to an individual. Cookies can be either "persistent" or "session" based. Persistent cookies are stored on your computer, contain an expiration date, and may be used to track your browsing behaviour upon return to the issuing website. Session cookies are short-lived, are used only during a browsing session, and expire when you quit your browser.

You can also disable cookies on your web browser. For instructions on how to block or delete cookies please consult your browser's privacy or help documentation. Disabling cookies may interfere with your use and enjoyment of our websites.

6.2 Google AMP Client ID API

In addition, KEE uses the Google AMP Client ID API to consolidate information on each unique visitor to their many interactions with our site. This consolidated information provides a more accurate picture of visitor journeys and use of our services and website. The Google AMP Client ID API assigns a unique randomly generated identifier to each visitor and uses this identifier to link all activity associated with that particular visitor. The unique identifier, web analytics data



and Cookies do not contain personally identifiable information such as your name or email address and therefore cannot be used to identify you.

6.3 Third Parties and Interest-based Advertising

KEE also collects statistical information about visitors to our website using web analytics and session recording technology provided by third party service providers such as Google Analytics. Google Analytics tracks and reports on website traffic to enable businesses to see their return on investment in online marketing. KEE does not sell or licence Personal Information to third parties. KEE may permit third parties to collect Personal Information through our websites and share Personal Information with third parties for business purposes. These business purposes are described above and include providing advertising on our websites and elsewhere based on users' online activities over time and across different sites, services, and devices (so-called "interest-based advertising"). The information practices of these third parties are not covered by this Privacy Policy. Some of these companies are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies. To learn more, please click [here](#) or [here](#). To learn about how Google processes your personal data and what choices you may have, visit their site [here](#).

6.4 Do-Not-Track Signals and Similar Mechanisms

Some web browsers transmit "do-not-track" signals to websites. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.

6.5 Third-party sites

Please be aware that our websites contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. The information practices of those third-party websites linked to the KEE website are not covered by this Privacy Policy. The privacy policies that apply to those other websites may differ substantially from this Privacy Policy, so we encourage you to read them before using those websites.

6.6 Secrecy of passwords and account information

You are solely responsible for maintaining the secrecy of your passwords or any account information. Please be careful and responsible whenever you're online. If you post Personal Information online that is accessible to the public, you may receive unsolicited messages from other parties in return. While we strive to protect your Personal Information, KEE cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk.

7. USE OF CCTV

CCTV significantly enhances the ability of KEE to monitor and operate its sites.



KEE uses CCTV for quality assurance purposes, including to ensure compliance with terms of entry to its sites, to assist in the detection and prevention of unlawful activity, and to promote operational, security and safety outcomes at its sites, for the benefit of employees, customers and the general public.

KEE may disclose CCTV footage to third parties in limited circumstances, including for operational or law enforcement purposes or as otherwise authorised or permitted by law.

All video footage captured by CCTV is retained by KEE for a specific period, after which time it will be erased, unless it has been identified for retention for the purpose of investigating a specific incident or as otherwise required or permitted by law.

This Privacy Policy does not detail our workplace surveillance policies. Refer to IMS-POL-014 Workplace Surveillance Policy.

8. ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You may request that KEE confirm whether it holds any Personal Information about you and, where applicable, request that KEE provide you with a copy of your Personal Information.

Sometimes, we may not be able to provide you with access to all of your Personal Information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your Personal Information. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested.

If you think that any of the Personal Information, we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

9. HOW TO MAKE A COMPLAINT

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your Personal Information, you can contact us using the details set out below. You should include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you are unhappy with our response to your complaint, please let us know and we will provide you with information about the further steps you can take.

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that we may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website www.oaic.gov.au.

Some specific processes and procedures apply to queries and complaints regarding credit related Personal Information.



10. CONTACTING KIMBRIKI ENVIRONMENTAL ENTERPRISES

If you have any questions about KEE's handling of Personal Information, or if you wish to make an access or correction request or complaint, you should contact the KEE Privacy Officer by one of the following methods:

By email: privacy@kimbriki.com
By post: Attention: The Privacy Officer
Kimbriki Environmental Enterprises Pty Ltd
PO Box 196, Terrey Hills, NSW, 2084

KEE may make changes to this Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

11. RELATED DOCUMENTS

- IMS-POL-002 Workplace Privacy Policy
- IMS-POL-014 Workplace Surveillance Policy
- IMS-PLN-008 Data Breach Response Plan