

## Privacy Policy

### Mondium Management System

MMS-HRM-POL-010

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## 1.0 Purpose

This policy seeks to ensure that personal information managed by the Company is handled in a way that is compliant, ethical and adheres to industry best practice.

## 2.0 Scope

This policy applies to Mondium and the entities that it controls (Mondium).

## 3.0 Roles and Responsibilities

Role	Responsibility
Managing Director	The Managing Director is responsible for the development, maintenance and implementation of this policy.

## 4.0 Definitions

Term	Definition
Company	This document applies to all sites, employees and activities of Mondium Pty Ltd (herein referred to as The Company.)
Personal information	Personal information is in general terms, any information that can be used to personally identify an individual.

## 5.0 Referenced Documents

Document Number	Document Title
Nil.	

## 6.0 Process Description

### 6.1 Policy

Mondium is committed to protecting the privacy of your personal information.

This Policy sets out the way that Mondium handles personal information. This Policy applies to Mondium and the entities that it controls (Mondium).

Mondium treats personal information in accordance with the applicable laws in each jurisdiction in which we operate. In Australia, we comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

All Mondium personnel must comply with this Policy and any breaches may be the subject of disciplinary action

### 6.2 What personal information we collect and why

Mondium may collect, hold, use or disclose personal information where it is reasonably necessary for, or directly related to our functions and activities, such as:

- Delivering works and services to our customers;
- Engaging with our customers, suppliers, contractors and personnel;
- Recruitment;
- Complying with our legal and regulatory obligations; and
- Data analytics and business improvement programs.

The main way that we collect personal information is when you provide it to us. We may also collect personal information from third parties where either you have consented to us doing so, we are permitted to do so by law or where it unreasonable or impracticable for us to collect it directly from you.

Some of the types of personal information that we may collect includes:

- Contact details such as name, personal and work addresses, email address, telephone number;
- Personal information such as date of birth, bank account details, tax file numbers, credit information, emergency contacts;
- Human resources information (including pre-employment information) including salary, job title, medical records and history, employment history, reference checks, immigration status, work performance information;
- Identification documentation such as drivers' licence, birth certificate and passport details;
- Qualification details such as education, professional affiliations, licences and qualifications;
- Site visitor information such as name, signature, and identifying information;
- Website usage details.

Where it is practicable and lawful, you have the option of not identifying yourself, or using a pseudonym, when you are dealing with Mondium. However, in most circumstances it will be not be practical for us to deal with you unless we can identify you.

### 6.3 Sensitive Information

We may collect sensitive information from you where:

- You consent to us collecting that information;
- Collection is reasonably necessary for, or directly related to our operations; or
- Collection is required or authorised by law.

Sensitive information is defined under the Privacy Law as personal information that includes information about your health, racial or ethnic origin, political opinions, political or association memberships, religious beliefs or affiliations, philosophical beliefs, sexual orientation or practices, criminal record, genetic or biometric information.

Your consent may be withdrawn at any time upon your request.

### 6.4 Storage and Disclosure

Generally, we will only use and disclose any personal information for the primary purpose for which it was collected and any secondary purpose which is related to the primary purpose or which is required or authorised by law. We will only use or disclose any sensitive information for a secondary purpose if that purpose is directly related to the primary purpose.

We may disclose personal information between related bodies associated with Mondium.

In carrying out our functions and activities, we may, from time to time, provide information to third parties, such as our customers, suppliers and joint venture partners. These third parties may be located locally or overseas.

We will take reasonable steps to destroy or de-identify your personal information once:

- The purposes for which we collected your personal information have ceased; and
- We are no longer required to retain your personal information by law

### 6.5 Disclosure outside Australia

We may disclose personal information to entities outside Australia where it is reasonably necessary for us to do so for our business purposes.

Where we disclose information outside Australia, we will take all reasonable steps to ensure that the overseas recipient complies with this Policy and the Privacy Act.

### 6.6 Access to and correction of your personal information

If you want access to your personal information you can submit a written request using the details in the Contact Us section below. In some cases a reasonable administration fee may be charged for providing access. We will only refuse access where we are entitled to do so under the Australian Privacy Principles or otherwise at law. You may complain about any refusal by submitting a written complaint using the details in the Contact Us section below.

We will take reasonable steps to ensure that any personal information that we hold about you is accurate, up to date and complete. If your personal information changes, or if you believe that the personal information that we hold is no longer accurate, up to date or complete, then you can ask us to correct it by sending a written request using the details in the Contact Us section. If we agree with you, we will correct the information. If we disagree, then we will tell you and we will note on your record that you consider the

information to be inaccurate. You can complain about our decision not to correct the information by submitting a written complaint using the details in the Contact Us section below.

## **6.7 Security**

We will take reasonable steps to ensure that your personal information is secure and to protect it from misuse, interference, loss, unauthorised access, unauthorised modification and unauthorised disclosure. Where we provide your information to a third party we will also require them to take reasonable security measures.

## **6.8 Cookies & Website Links**

If you visit the Mondium website, then we may collect information from you through the use of cookies. A cookie is a small file that a website may store on your device to record information about your use of that website, such as your IP address, browser type, language, access times and any referring website addresses. We collect this information for analytical purposes to help us improve you experience when you visit our website.

A cookie will only include personal information that you supply. It cannot otherwise read information from your device. We will notify you about our use of cookies when you visit our website. You may choose to reject the use of cookies but this may impact on some of the functionality provided by our website.

We may use analytical tools provided by third parties to collect data about how people interact with our website.

Our website may contain links to other websites. We do not own or control these websites and are not responsible for the privacy practices that apply to these websites.

By accessing our website, you consent to the collection, use and disclosure of personal information as described in this Policy, as amended from time to time.

## **6.9 Contact us**

If you need to contact us because of concerns about how your personal information is handled or processed please contact the Mondium Privacy Officer via:

- Email: [privacy@monadel.com.au](mailto:privacy@monadel.com.au).
- Post: PO Box 600, Victoria Park WA 6979

## **6.10 Changes to Privacy Policy**

The Company will update this Privacy Policy when the way that we handle personal information changes. Any changes or amendments will be published on our website.