



Privacy Policy

Enzen Australia – Policies

*Document Name: Privacy Policy
Author: Carolyn Herraman
Version: 2.1
Final Revision Date: 21 June 2021
Approved by: Policy Review Committee*

Privacy Policy

Enzen Australia Pty Ltd ACN 608 963 775 (we, us, our) is an advisory and consultancy services business in the area of Transmission and Distribution of Energy in the Utilities Sector, servicing power, gas and water sectors. and is bound by the Australia Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**). We understand the importance of, and are committed to, protecting your personal information. This Privacy Policy explains how we manage your personal information (that is, information or an opinion about you, whether true or not, about an individual who is identified or reasonably identifiable), including our obligations and your rights in respect of our dealings with your personal information.

Please take a moment to read our Privacy Policy as it describes what happens to your personal information that is collected by our business. Paragraph 8 specifically sets out how we handle personal information relating to our own employees.

If we agree with you to use or disclose any of your personal information in ways which differ to those stated in this Privacy Policy, the provisions of that agreement will prevail to the extent of any difference.

1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- (a) when you make an inquiry or otherwise contact us through our website or via email;
- (b) in administering and performing any contracts with service providers;
- (c) when you contact us via telephone or facsimile;
- (d) when you interact with us on social media, or via online forms or surveys;
- (e) from correspondence (whether in writing or electronically);
- (f) through any mobile applications provided by our organisation;
- (g) while conducting customer satisfaction and market research surveys;
- (h) when administering any of our services; and
- (i) as otherwise required to manage our business.

However, in certain cases we may collect personal information from publically available sources and third parties, such as our related entities, as well as our suppliers, recruitment agencies, contractors, our clients and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

2. Types of personal information we collect

The type of personal information we may collect can include (but is not limited to), your name, postal address, email address, phone numbers, date of birth, billing information and, if applicable, employment information, education history and insurances held.

We may also collect and hold sensitive information about you, including:

- (a) health information;

- (b) your racial or ethnic origin;
- (c) your criminal record;
- (d) your work rights details;
- (e) your sexual orientation;
- (f) your religious beliefs or affiliations;
- (g) genetic information;

We only collect sensitive information about you with your consent, or otherwise in accordance with the Privacy Act.

Where you do not wish to provide us with your personal information, we may not be able to respond to your queries, or provide you with requested services.

3. Our purposes for handling your personal information

As a general rule, we only use and disclose personal information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use and disclose personal information to:

- (a) offer and provide you with our services;
- (b) manage and administer those services, including account keeping procedures;
- (c) communicate with you, including (but not limited to), as part of the services;
- (d) comply with our legal and regulatory obligations; and
- (e) otherwise to manage our business.

We may disclose personal information between our organisations or to third parties such as our suppliers, organisations that provide us with technical and support services, or our professional advisors, where permitted by the Privacy Act. If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

We may also use or disclose your personal information where we are required by law to do so.

We will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure, or as otherwise may be permissible under the APPs.

4. Protection of personal information

We will hold personal information as either secure physical records, electronically on servers maintained by us or other members of the Enzen group, in cloud storage, and in some cases, records on third party servers. Paragraph 9 below discusses the circumstances in which such servers may be located overseas.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information.

Our staff are required to follow documented procedures in handling personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information do their job. These access

restrictions are reviewed periodically. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

5. Direct marketing

Like most businesses, marketing is important to our continued success. We believe we have a unique range of products and services that we provide to customers at a high standard. We therefore like to stay in touch with customers and let them know about new opportunities. We may provide you with information about new products, services and promotions either from us, or from third parties which may be of interest to you.

We will not disclose your personal information to third parties for marketing purposes unless permitted by the APPs, such as where you have provided your consent.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer.

6. Cookies

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the Website. This information will help to better adapt the Website to suit personal requirements. For information on cookie settings of your internet browser, please refer to your browser's manual.

7. Accessing and correcting your personal information

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if it does not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

8. Employees

We collect information in relation to employees as part of their application and during the course of their employment, either from them or in some cases from third parties such as recruitment agencies. Under the Privacy Act, personal information about a current or former employee may be held, used or disclosed in any way that is directly connected to the employment relationship. We handle employee information in accordance with legal requirements and our applicable policies in force from time to time.

We are not required to provide our employees with the ability to access or correct their own personal information under this Privacy Policy, and will instead handle these matters in accordance with our internal procedures.

9. Overseas transfers of personal information

We may disclose personal information between our related bodies corporate and other associated entities, where permitted under the Privacy Act. Members of the Enzen group currently operate out of offices in India, Spain, the United Arab Emirates, and the United Kingdom. We therefore may disclose personal information to our associated entities in these countries.

From time to time we may engage an overseas recipient to provide services to us, such as cloud-based storage solutions. It is not practicable to specify the locations in which these service providers may be located.

If in future we propose to disclose personal information overseas in other circumstances, we will do so in compliance with the requirements of the Privacy Act. We will, where practicable, advise you of the countries in which any overseas recipients are likely to be located.

In instances where we are required by a legal or contractual obligation to keep personal information held in Australia, we will comply with these requirements, and will not disclose such personal information to entities located overseas.

Otherwise, by providing your personal information to us, you consent to us disclosing your personal information to any such overseas recipients for purposes necessary or useful in the course of operating our business, and agree that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the Australian Privacy Principles, that entity will not be bound by, and you will not be able to seek redress under the Act.

10. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Privacy Officer:

The Privacy Officer

1 King William Street, Adelaide, South Australia, 5000

Telephone: +61 439 507 889

Email: tara.cooper@enzen.com

We take all complaints seriously, and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

11. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.