

# Privacy Policy

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TDG Environmental and its related entities (referred to as **“TDG,” “we”** or **“our”**) are committed to the protection of your Personal Information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) (**“Privacy Act”**).

This Privacy Policy describes the manner in which TDG collects, holds, and uses Personal Information that is covered by the Privacy Act. It is not intended to cover categories of Personal Information that are not covered by the Privacy Act. If you wish to make any inquiries regarding this Privacy Policy, you should contact TDG in any of the ways specified in clause 14.

TDG may, from time to time, review and update this Privacy Policy including to take into account new laws, regulations, and technology. All Personal Information held by TDG will be governed by our most recent Privacy Policy, posted on our website. Our most recent Privacy Policy will apply to our collection, use and disclosure of Personal Information.

## 1. What is **“Personal Information”**?

**“Personal Information”** is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether recorded in a material form or not.

## 2. What Personal Information do we collect and hold?

TDG may collect and hold Personal Information such as your name, gender, date of birth, age, contact details (including your address, phone number and email, whether personal or for work), financial information, payment details, bank account details, tax file number and/or products and services information and preferences.

## 3. Why do we collect Personal Information?

- 3.1** TDG collects Personal Information from customers, officers, employees, contractors, consultants, service providers, agents, shareholders and other individuals that is reasonably necessary for one or more of our functions or services, including: in order to allow us to conduct our business functions, to market and sell our products and services, to conduct officer, employee, contractor, consultant, service provider, agent or shareholder related activities and to conduct product and market research related activities.
- 3.2** If you choose not to provide your Personal Information to TDG, we may not be able to undertake certain activities for you such as providing you with requested information, products, or services.

## 4. When and how do we collect Personal Information?

TDG collects Personal Information when you: become an officer, employee, contractor, consultant, service provider or agent of TDG, visit our Website, supply, use, or buy products or services, request information about us or our products or services, provide feedback, contract with us, become or apply to become a shareholder, fill in a form on our Website, fill in one of our surveys, or contact us by telephone, facsimile, email, post or in person.

- 4.1** TDG may also collect Personal Information about you via third parties including our suppliers, merchants, survey providers or marketers.
- 4.2** In some circumstances we may receive Personal Information that we have not requested. If this occurs, we will comply with our obligations under the Privacy Act. If we retain any Personal Information we have not requested, we will treat it in accordance with this Privacy Policy.
- 4.3** You acknowledge that we may de-identify and/or destroy this information unless we are required to keep it by law.

## 5. Information collected via our Website

- 5.1** TDG will not collect any Personal Information about users of our Website except when they knowingly provide it or as otherwise described below. For example, TDG may collect Personal Information from users when they:
  - (a) complete an online form on our Website; and/or
  - (b) complete one or more of our surveys; and/or
  - (c) otherwise correspond with TDG.

# Privacy Policy

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## **Click Stream Data**

**5.2** When you visit and browse our Website, our Website host may collect information (which may or may not include Personal Information) for statistical, reporting and maintenance purposes. Subject to clause 7.4, the information collected by our Website host will not be used to identify you. The information may include:

- (a) the number of users visiting our Website and the number of pages viewed.
- (b) the date, time, and duration of a visit.
- (c) the IP address of your computer; or
- (d) the path taken through our Website.

**5.3** TDG's Website host uses this information to administer and improve the performance of our Website.

## **Cookies**

**5.4** Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns.

**5.5** Cookies involve the collection of information about you (which may or may not be Personal Information) in a way which may not be obvious to you. Generally, the information collected through cookies relates to a device used to access online content, such as an IP address or location data about the device. Cookies may also collect information about the behaviours of the user of the device, such as the websites visited by the user and their activity on the website. In some circumstances, the information collected through cookies may be combined with information that identifies the end user of the relevant device. Any Personal Information we collect in this way is handled in accordance with this Privacy Policy.

**5.6** If you access our Website, a cookie is downloaded onto your computer's hard drive when you first log on to our Website. You can adjust your internet browser to disable cookies, however TDG may not be able to provide you with all the service or functionality you require on our Website if you choose to do so.

## **Web Beacons**

**5.7** Web beacons are images that originate from a third-party site to track visitor activities. TDG may use web beacons to collect aggregate data and provide this information to our Website host to administer and improve the performance of our Website.

## **6. How TDG uses the Personal Information it collects about you**

**6.1** TDG uses the Personal Information it collects about you for our business functions and activities, which may include the following:

- (a) to provide you with information, products, or services you have requested.
- (b) to promote and market our products and services to you.
- (c) to personalise and customise your experiences on our Website.
- (d) to help TDG research the needs of its customers.
- (e) to conduct research for the purposes of improving existing products or services or creating new products or services.
- (f) to provide you with ongoing information about TDG and its activities.
- (g) to allow us to provide third party information and offers in which we believe you may be interested.
- (h) to comply with regulatory or other legal requirements.
- (i) for purposes related to the employment of our personnel and providing internal services to our staff.
- (j) if you are a shareholder or apply to become a shareholder, to process your application, service your needs as a shareholder, provide facilities or services that you request, and administer your shareholding; and
- (k) for any other purpose communicated to you at the time that the Personal Information was collected or for which you provided your consent.

# Privacy Policy

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- 6.2** TDG may use your Personal Information for a secondary purpose if that secondary purpose is related to those purposes in clause 6.1, if we have your consent or if otherwise provided for under the Privacy Act.
- 6.3** TDG may use your Personal Information to provide you with direct, targeted, or other marketing materials on an ongoing basis. TDG may provide you with these materials by telephone, electronic messages (e.g., email), our digital services and other means. TDG will only provide you with direct marketing materials where you would reasonably expect us to, or if you consent to receive direct marketing materials. We will seek your consent to provide you with direct marketing materials if we have obtained your Personal Information from a third party. Direct marketing communications may include promotional material about TDG or may relate to the products and services TDG, and our related entities, provide and other products and services which may be of interest to you.
- 6.4** You may opt out of receiving direct marketing material by contacting us in any of the ways specified in the direct marketing materials or as set out in clause 14.
- 6.5** Generally, we will only collect and use your Personal Information in accordance with this Privacy Policy. In the event that we collect or use Personal Information in ways other than as stated in this Privacy Policy, we will ensure that we do so in accordance with the Privacy Act.

## 7. Who do we disclose your Personal Information to?

- 7.1** Depending on the nature of your engagement with TDG, we may disclose your Personal Information to shareholders, officers, employees, contractors, consultants, agents of TDG, third parties that provide products and services to or through TDG or our Website, directly to you (at your request), suppliers and other third parties, or otherwise as required by law.
- 7.2** TDG may also disclose your Personal Information to our Website host or software application providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner.
- 7.3** We may also share non-personal, de-identified and aggregated information for research or promotional purposes. We will not sell your Personal Information to third parties for marketing purposes.
- 7.4** Unless otherwise specified in this Privacy Policy, TDG or TDG's Website host will not disclose any of your Personal Information to any other organisation unless the disclosure is required by law or is otherwise permitted by the Privacy Principles.

## 8. Disclosure of your Personal Information overseas

- 8.1** Your Personal Information may be disclosed outside of Australia to an entity in a foreign country, including entities in which TDG has an ownership interest or to a service provider in the business of providing data storage and processing services (which commonly involve diverse geographic location which change from time to time, which means it is not practical for us to notify you of which country your Personal Information may be located in). It is possible that entities with whom we share your information outside Australia may be subject to foreign laws that do not provide the same level of protection of Personal Information as in Australia.
- 8.2** By providing your Personal Information, you acknowledge that you understand the risks associated with the disclosure of your Personal Information overseas and expressly consent to the disclosure of your Personal Information to an overseas entity.

## 9. Employee records

Employee records are not generally subject to the Privacy Act. As such this policy may not apply to the handling of officer, employee, contractor, or consultant information. Please contact us directly for information about these information handling practices.

## 10. Storage and security of Personal Information held by TDG

- 10.1** TDG views the protection of privacy as a serious matter. TDG will take reasonable steps to protect your Personal Information from misuse, interference, and loss and from unauthorised access, modification, or disclosure.

# Privacy Policy

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**10.2** TDG aims to keep your Personal Information secure and up to date. We will comply with our obligations under the Privacy Act in relation to any Personal Information that we handle, including information which is held on TDG's computer systems.

**10.3** Personal Information that is held by TDG in hard copy is stored securely on its premises and is only disclosed or used for the purposes described in this Privacy Policy.

## 11. Updating and Correcting your Personal Information

We will take reasonable steps to ensure that the Personal Information that we hold is accurate, up-to-date and complete. You have a right to request your Personal Information to be corrected. You can update your Personal Information at any time by contacting TDG in any of the ways specified in clause 14. TDG welcomes any changes to your Personal Information so as to keep our records up to date.

## 12. How long will TDG keep your Personal Information?

**12.1** We will keep your Personal Information only for as long as required for our business purposes and otherwise as required by Australian law.

**12.2** Where we no longer need to keep your Personal Information in accordance with clause 12.1, we will take reasonable steps to destroy or de-identify your Personal Information.

**12.3** If you wish to have your Personal Information destroyed or de-identified, please let us know and we will take reasonable steps to do so (unless we need to keep it for legal, auditing, or internal risk management reasons).

## 13. Finding out what Personal Information TDG holds about you

**13.1** You are entitled to access Personal Information that TDG holds about you. If you request access to your Personal Information, we will grant your request unless providing you with access would unreasonably impact upon the privacy of others or is not otherwise permitted under the Australian Privacy Principles or at law. If we refuse your request to access your Personal Information, we will provide you with written reasons for the refusal.

**13.2** A request for access can be made by contacting TDG in any of the ways specified in clause 14.

## 14. How to contact us

If you feel that your privacy has not been respected or that TDG has conducted itself inconsistently with this Privacy Policy, the Privacy Principles, a registered APP Code and/or the Privacy Act in respect of your Personal Information, or for any other queries, problems, complaints or communication in relation to this Privacy Policy, please contact us in any of the following ways:

**email:** [hr@tdg.com.au](mailto:hr@tdg.com.au)

TDG will review and respond to your complaint as soon as possible, generally within 30 days of receiving it. If our HR department does not resolve your complaint to your satisfaction and no other complaint resolution procedures are agreed or required by law, our HR department will inform you that your complaint may be referred to the Privacy Commissioner for further investigation and will provide you with the Commissioner's contact details.