

1. Scope and Purpose

This Policy sets out the requirements for the collection, usage, storage, and disclosure of information as required by the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth) (Australia) or the *Privacy Act 2020* (New Zealand). This Policy applies to CSE Global (Australia) and all its subsidiaries, hereon CSE.

2. What Information CSE Collects

CSE collects and holds Information on customers, job applicants, staff members, contractors, suppliers, and other parties who come into contact with CSE during the course of business.

The Information CSE collects and holds will include (but is not limited to):

- Name, address, and other personal contact details.
- Company name, address and other company contact details.
- Names of company employees and other contact details required to communicate for business purposes.
- Business and personal referees.
- Credit Card details where transactions are made using credit card payment.
- Bank account details where there is a need to transfer funds from CSE to a supplier or contractor.
- Purchase history of customers.
- Supply history of suppliers and contractors.
- Credit rating and worthiness.
- Organisational capability statements.
- Organisational employee training matrices and certifications.
- Employee qualifications.
- Company compliance information – Relating to relevant regulatory requirements during the course of business.
- The server address.
- The domain name.
- The date and time of individuals visiting the CSE website.
- The pages viewed and information downloaded from the CSE website.
- The previous websites visited.
- The type of internet browser used.

3. How and Why CSE Collects Personal Information

Information is generally collected on individuals directly via forms and other documents provided to CSE by individuals including through the internet and social media, correspondence individuals may have provided to CSE and discussions they may have had with CSE.

CSE will collect and hold Information for the following purposes (unless otherwise required or permitted by law):

- If the individual is a job applicant, this enables CSE to assess the suitability and/or engage with the applicant and to assist with administering an employment contract and facilitating the payment of wages, salaries, and entitlements.
- To engage and set up a new customer, supplier, or contractor within CSE's Customer Relationship Management (CRM) system or Enterprise Resource Planning (ERP) system.
- To manage CSE's relationship with the individual.
- To facilitate the payment of debt CSE may have with suppliers and contractors.
- To facilitate and manage the payment and recovery of amounts payable to CSE by a customer.
- To respond to tenders and/or requests for quotes and information from CSE customers.
- For other purposes which are reasonably necessary in connection with CSE business functions and activities.

The collection of this Information enables CSE to provide the goods or services customers require or to receive the goods or services suppliers deliver and provides an avenue for CSE to develop and continue building business relationships with the individual.

4. How CSE Stores Personal Information

CSE will store Information in hard-copy paper and electronic format. CSE has a number of procedures in place to protect the Information the Company holds from loss, misuse, interference and unauthorised access, modification, or disclosure.

These procedures include the access permissions of employees as well as information and communication technology data security channels.

CSE strives to ensure the security of the Information and takes steps to protect the Information from:

- Misuse, interference, and loss.
- Unauthorised access, modification, or disclosure

CSE will review and update the physical and data security measures in light of current technologies. Unfortunately, no data transmissions over mobile data and communication services can be guaranteed to be completely secure.

For security purposes, the Information that we receive and/or provide to third parties will be encrypted.

CSE works to prevent unauthorised use or disclosure of Information as practically possible. However, CSE will not be held responsible for events arising from unauthorised use or access to the Information.

5. How to Access Personal Information

If individuals wish to obtain access to their personal and/or organisational information that CSE holds, they may contact the Company using the contact details set out below in *Section 12 – Contact Information*. If requesting copies of personal and/or organisational information held by the Company, CSE will endeavour to provide the individual with the Information as soon as is reasonably practicable.

If an individual requests access to the personal and/or organisational information, CSE will require the individual to verify their identity and specify what Information they require.

In the event the release of a personal and/or organisational information may have an unreasonable impact on the privacy of others or will result in CSE breaching other confidentiality matters, the request may be denied.

6. Quality and Accuracy of Information

While CSE endeavours to ensure that the personal and/or organisational information collected from individuals / organisations are up to date, accurate, and complete, CSE relies on the personal and/or organisational information provided is free from errors and omissions.

Individuals / organisations may request that CSE updates or varies their personal and/or organisational information by using the contact details set out below in *Section 12 – Contact Information*.

7. Disclosure of Information

CSE may disclose the Information to the following types of entities in relation with the purposes pursuant to *Section 3 – How and Why CSE Collects Personal Information* above:

- CSE consultants and advisors.
- CSE Associates and related entities.
- CSE Contractors and Customers.
- Marketing and data collection providers (worldwide) with consent.
- Industry bodies.
- Tribunals and/or Courts when required by law.
- In connection with any complaint made by individuals about CSE.
- Referees for account or job applications.
- Assessment of potential contracts between individuals and CSE.
- Other entities with consent.

8. Marketing and Communications

CSE will not use personal and/or organisational information for any marketing or communications purposes without the individual's written permission.

9. How Cookies are Managed

Cookies are small text files that are placed on your computer by websites you visit. Like many websites, they are widely used to assist websites work more efficiently, as well as to provide some information to the website owner.

CSE website uses a variety of session-based cookies (or temporary cookies) and persistent cookies which allow CSE to review usage patterns and understand interests and behaviours as individuals browse the site to help the Company deliver a more personalised experience in the future. A session-based cookie only lasts as long as the browsing session and ends when the browser is closed. A persistent cookie remains on the computer after the browser is closed and will be found each time users visit the same website until they clear the cookie from their browser.

Cookies also records any difficulties experienced whilst using a CSE site and assists in improving functionality.

The use of cookies is now standard for most websites. To control the use of cookies, manage or block them through the browser, including removing cookies by deleting them from the 'browser history' (cache) when leaving the site.

CSE will only collect personal information if it is reasonably necessary for, or directly related to one or more of CSE's functions or activities. If the information is sensitive personal information, CSE will only use it for the purpose for which individuals have provided it or is otherwise permitted under the Privacy Act. Any collection will be by lawful and fair means.

CSE websites use many of the Google Analytics suite which transmits website traffic data to Google servers that do not identify individual users or associate the IP address with any other data held by Google but help us to understand website traffic and webpage usage.

Individuals consent to Google processing their data as listed in their [Privacy Policy](#).

10. Complaints and Breaches

If individuals believe that CSE has breached the APPs, the Privacy Act, or any related privacy code in dealing with their personal and/or organisational information, they may lodge a complaint by writing to CSE using the contact details set out below in *Section 12 – Contact Information*.

CSE will endeavour to respond to each individual's communication as soon as reasonably practicable. Furthermore, CSE will confirm the individual's communication and will provide them with the Information on how CSE proposes to deal with their complaint.

If they are not satisfied with CSE's response to their complaint, they may lodge a complaint with the Privacy Commissioner.

11. Policy Updates

CSE may vary and update the terms of this Privacy Policy from time to time. Any variation or update will be in relation to new laws, new technologies, and changes in the way CSE operates the business and collect or use the Information.

12. Contact Information

Employees can direct any enquiries or complaints in relation to their privacy, the Information, and this Privacy Policy by contacting the Group Commercial Manager (commercial@cse.net or 08 9204 8071).

13. Anonymity and Pseudonyms

Individuals have the option of not identifying themselves or using a pseudonym when dealing with CSE, unless CSE is required by law or a Court to deal with individuals who have identified themselves or it is impractical for CSE to deal with the individual if they have not identified themselves.