

PRIVACY POLICY - SODEXO AUSTRALIA

This Privacy Policy explains how Sodexo Australia Pty Limited (ACN 006 072 975) and its related bodies corporate including Sodexo Remote Sites Australia Pty Limited (together and separately **Sodexo** and **we, us** or **our**) handles personal information relating to individuals, whether or not they are customers, so as to ensure we meet our obligations under the *Privacy Act 1988 (Cth)* (or, if you are located in New Zealand, the *Privacy Act 2020 (New Zealand)*) (**Privacy Act**).

Whose information do we collect?

We collect personal information from our:

- Clients, including their customers, employees and contractors
- suppliers
- contractors
- employees and potential employees.

Why do we collect your personal information?

We collect personal information about you that is necessary for one or more of our functions or activities, which may include but are not limited to:

- providing our services, which may include catering, healthy lifestyle services, soft and technical facilities and maintenance services
- administering and managing our services, including charging, billing and collecting debts
- recruiting employees, contractors and consultants
- informing you of our products and services
- engaging service providers, suppliers or contractors.

You may choose not to provide us with personal information. However, if we are not provided with personal information then we may be unable to provide you with our services.

What personal information do we collect?

We only collect personal information about you to the extent it is reasonably necessary for, or directly related to, one or more of our functions or activities. The kinds of information we collect include:

- name
- date of birth
- address
- credit/debit card number and expiry date
- financial details
- tax file number
- driver licence details
- health information
- meal preferences
- other information we consider necessary to provide our services.

How do we collect personal information?

We collect personal information about an individual directly from that individual unless it is unreasonable or impracticable for us to do so. We may collect personal information from you directly during telephone calls with our representatives, through your use of our website, on forms and other correspondence you send to us (including email, facsimile and letter) and when we deliver services to you.

We may also collect personal information about you from third parties where it is unreasonable or impracticable to collect that information directly from you, for example from:

- contractors conducting pre-employment medical assessments on our behalf
- our clients, where the collection is required so that we may carry out services for that client (for example, if you are an employee of one of our clients, they may disclose your details to us to enable you to use our services)
- third parties who book one of our services on your behalf
- third parties who provide us with a service, but only where your personal information is reasonably necessary for us to access, or directly related to, that service.

Collecting sensitive information

Some of the information we collect from you may be regarded as sensitive information under the Privacy Act. Sensitive information includes (without limitation) health information and any of the following information that is also personal information: information about your racial or ethnic origin, religious beliefs, membership of a profession or trade association, sexual orientation and criminal record.

We will only collect sensitive information about you with your consent.

Use and disclosure of personal information

Generally we will only use and disclose your personal information:

- for the purpose for which it was collected
- for a purpose reasonably related to the primary purpose of collection (or if it is health information, a directly related purpose) which you should reasonably expect
- for a purpose to which you have consented
- where required or authorised by law.

For example, we may disclose your personal information to:

- our clients, where required in order provide a specific service to that client
- our related companies
- third party service providers, including contractors and consultants, where required for the provision of a specific service
- security organisations for the purposes of obtaining clearance certificates.

Quality of personal information

We will take all reasonable steps to ensure the personal information we collect remains accurate, up to date and complete. We will take all reasonable steps to correct any inaccurate personal information of which we are made aware.

Storing personal information and overseas disclosure

We store personal information in different ways, including paper and electronic form, at our offices located in Australia and on our servers primarily located in Australia, the United States and Europe. We may also store personal information through offices of our service providers at various locations. We may process and store personal information in the cloud, and therefore personal information may be stored outside of Australia. Where this occurs, we take reasonable steps to ensure the security of this information. If we no longer require personal information, we will destroy or de-identify that personal information.

We operate across Australia as part of a worldwide group of companies and utilise international service providers. As such, some disclosures may occur outside the state or territory in which you are resident and may, from time to time, include disclosures to related entities or service providers in France, the United Kingdom or the United States.

Data Security

The security of personal information is important to us and we will take reasonable steps to protect personal information which we hold from misuse or loss and from unauthorised access, modification or disclosure. Among other things, we safeguard our IT systems against unauthorised access and ensure that paper-based files are secured. We also ensure that access to your personal information within our systems is only available to our staff who need to have access in order to do their work.

Employee Records

In accordance with the Privacy Act, this policy does not apply to our acts and practices directly related to one of our current or former employment relationships between us and our employees, in respect of an employee record held by us relating to the employee.

If we transfer employee records offshore for any reason, we will comply with cross-border restrictions set-out in the Privacy Act which apply to the overseas transfer of personal information.

Access and correction of personal information

You have a right to access your personal information, subject to some exceptions allowed by law. If you do not believe that the information we hold about you is correct, you should contact us and we will take reasonable steps to correct the information.

You may request us to provide access to personal information held by us about you. There is no charge for requesting access to your personal information but we may require reimbursement of our reasonable costs in providing such information.

If we refuse you access to information, we will provide you with an explanation for the decision and of the exceptions relied upon for refusing access. If you are located in New Zealand and we do not make the correction requested, you may provide us with a statement of the correction sought and request that we attach that statement to the relevant information.

Corporate website

Set out at Annexure 1 is more information about the legal basis for each of our processing activities through our corporate website - <https://au.sodexo.com/home.html>.

Your rights if you are in the EU

You may have additional rights pursuant to your local law applicable to the processing of information about you. If the processing of that information is subject to the EU General Data Protection Regulation ("GDPR"), you may have the right to object to the processing of that information and other rights.

Identifiers and Anonymity

We will not use identifiers issued by government agencies (e.g. Tax File Number; Medicare Number) as an identifier for you.

If lawful and practical to do so, you will have the option of not identifying yourself when dealing with us. However, if you elect not to be identified we may be unable to provide you with services or information.

Who to contact?

Enquiries or complaints relating to your personal information collected and handled by us should be addressed to:

The Privacy Officer
Sodexo Australia Pty Limited
Level 8, 607 St Kilda Road
Melbourne Vic 3004
T: (03) 9880 6300
privacy.AMECAA.AU@sodexo.com

Complaints

If you wish to lodge a complaint about the way in which we have handled your personal information, including your request for access or correction of your personal information, you should advise us using the above contact details. We may contact you in order to obtain further information. We will investigate the complaint and provide you with the outcome of our investigation in writing.

We will endeavour to resolve complaints as quickly as possible. If you are not satisfied with the outcome of your complaint to us, you can refer your complaint to:

- the Office of the Australian Information Commissioner (www.oaic.gov.au); or
- the Office of the New Zealand Privacy Commissioner (<https://www.privacy.org.nz/>).

Changes to this Privacy Policy

We may amend this Privacy Policy from time to time. We will publish the updated Privacy Policy on this website and any updated Privacy Policy will supersede all previously Privacy Policies.



Keith Weston,

Managing Director | Sodexo Australia

November 2022

Annexure 1

INFORMATION ABOUT THE PROCESSING OF YOUR PERSONAL DATA COLLECTED THROUGH THE SODEXO AUSTRALIA CORPORATE WEBSITE

General purpose	Purpose of the Processing	Personal data collected	Legal basis of the Processing	Retention of the Personal data
Website and application management	For more information on the processing of your Personal data in the specific context of Cookies we invite you to consult our Cookie Policy IST-POL-004			
Recruitment	Assess your skills, qualifications, and suitability for the role	Name, address, telephone number, email address, nationality, gender, health information, signature, date of birth, photo, identification documents	In order to take steps at the request of the data subject prior to entering into a contract	We will keep your data for a period of six (6) years after we received your job application
	Carry out background and reference checks	Criminal record, health information	Legitimate interest	We will keep your data for the period necessary to carry out those checks

Document Information

Version history			
Version No.	Date Modified	Modified by	Description of change
01	-	Martin Richardson	New issue
02	07/02/2020	Marcus Nadenbousch	Updated to align with changes in law/ best practice
03	10/03/2022	Michael Nazareth	Update for online privacy policy annexure
04	24/11/2022	Michael Nazareth	Updated for new signatory and inclusion of NZ specific terms