



Privacy Policy

This Privacy Policy covers the:

- ISS Australia Group of companies, which includes ISS Facility Services Australia Ltd, ISS Security Pty Ltd, ISS Integrated Services Pty Ltd, ISS Health Services Pty Ltd, ISS Facility Services Pty Ltd, ISS Property Services Pty Ltd and their related bodies corporate (as defined in the *Corporations Act 2001* (Cth)); and
- ISS New Zealand Group of companies, which includes ISS Facility Services Limited and ISS Holdings NZ Limited.

(together and separately, **ISS, we, us** or **our**).

We are committed to protecting your privacy and will handle your personal information in accordance with this Privacy Policy and in accordance with our obligations under:

- the Privacy Act 1988 (Cth), including the Australian Privacy Principles; and
- the Privacy Act 1992 (New Zealand), including the New Zealand Privacy Principles,

as amended from time to time.

1. What is personal information and sensitive information?

Personal information is any information or an opinion about an identified individual, or information from which an individual can be identified.

Sensitive information is a subset of personal information and includes such things as criminal history.

2. What kind of personal information do we collect and hold, and why do we do so?

2.1 General

We collect your personal information to provide services to you and/or to obtain services from you.

Personal information which we may ask you to provide includes your contact information (such as your name, address, telephone number and email address) and identification details (such as your driver licence details, vehicle registration details and passport information). We may also collect your sensitive information. If we need this information, we will ask for your consent.

We may also ask you to supply information to us from time to time, including when you report a problem with our services and when we ask you to complete surveys, questionnaires and feedback forms that we use for quality monitoring and research purposes.

2.2 Legislative and Regulatory requirements

We may also collect your personal information to comply with legislative and regulatory requirements, including those arising under the *Aviation Transport Security Act 2004* (Cth) and the *Aviation Transport Security Regulations 2005* (Cth).

3. What happens if you do not give us this information?

It is your right not to give us any information and not to identify yourself to us. However, if you choose not to give us the personal information we request or you do not wish to identify yourself to us, we may not be able to provide you with the services or information you require.



4. How do we collect your personal information?

We generally collect personal information directly from you (unless you otherwise provide your consent). We collect the personal information you give us electronically including information provided: through your use of our website; during phone calls with our representatives; when we deliver and administer our services; and on forms or other correspondence, in writing or electronically, completed by you.

We may collect personal information about you from third parties and will let you know if we do so.

If we receive personal information about you that we have not requested, and if we determine that we could not lawfully have collected that information had we requested it, we will destroy or de-identify the information, if it is lawful and reasonable to do so.

Cookies

When you visit our website, it will send a cookie to your computer. This is a small piece of information stored on your hard drive which tells us that your computer has accessed our website. The cookie will not be able to identify you. If you do not want to use cookies, you can set your browser to reject them. We use cookies to collect data from our website to help us understand which are the most popular pages and when the peak usage times are, along with other information that helps us improve the content and make the navigation of our website easier.

Links on our website

Our website may contain links to third party websites. We advise that the terms of this Privacy Policy do not apply to external websites. If you wish to find out how a third party handles your personal information, you will need to obtain a copy of its Privacy Policy.

5. How do we use your personal information?

Your personal information is collected so that we can: comply with the law, including do anything that we are required or authorised by the law to do; manage our relationship with you; resolve any legal and/or commercial complaints or issues; facilitate our business operations, including to perform other functions and activities relating to the business of ISS and improve our services; and identify and (unless you tell us not to) tell you about our products and services, and those of third parties, that might interest you.

Generally, we will not use or exchange your information for any purpose other than one that is set out in this Privacy Policy, or for a purpose which is disclosed to you and to which you have consented.

6. Do we disclose information to third parties?

We may share or disclose your personal information for any of the reasons mentioned above to third parties, including: our related bodies corporate, agents, external advisers and our external service providers and contractors (such as any mail house, commercial agent or support services); government agencies including law enforcement, regulatory and dispute resolution bodies (or any other body to whom disclosure is required by law or court/ tribunal order); and any other person or entity to whom disclosure is authorised by you.

We will not share your sensitive information with any person or entity other than: our related bodies corporate; our employees, and the employees of our related bodies corporate; government or regulatory authorities (including law enforcement bodies, tribunals and courts), where required or permitted by law; and any other person as permitted by law.

When we disclose your information to a third party, we take all reasonable steps to ensure that those third parties are bound by confidentiality and privacy obligations with respect to the protection of your personal information.

7. Do we disclose your personal information to overseas recipients?

We will not disclose your personal information to organisations located outside Australia or New Zealand (as applicable) without your written consent except as set out below or where disclosure is otherwise authorised or required by law or court/ tribunal order.

We may disclose your personal information to our overseas operations or overseas contractors. Those recipients are generally located in Denmark, the United States of America, Ireland and India. Any such transfer, however, does not change any of our commitments to safeguard your personal information under this policy.

8. Direct marketing and promotional use of your personal information

We may use your personal information to provide you with information about our services or products or those provided by third parties, that we believe may be of interest to you. To that extent, we may provide your personal information to such third party organisations for specific marketing purposes. However, we will not do so where you tell us not to.

We may also wish to refer to you based on the nature of our business relationship when marketing our business to others. In those circumstances, we will ask for your prior consent and will only disclose personal information to the extent to which you have consented.

You can ask us not to contact you about products or services, and not to disclose your information to others for that purpose by contacting us or, where applicable, by clicking the "unsubscribe" button from promotional email messages.

9. Storage and security of your personal information

We hold your personal information in paper-based or electronic files. We have put in place safeguards to protect the personal information we hold from misuse, interference and loss, and unauthorised access, modification or disclosure. This includes a range of systems and communication security measures, as well as the secure storage of hard copy documents. In addition, access to your personal information will be restricted to those properly authorised to have access.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used in accordance with this policy.

10. How to access or correct your personal information

We take reasonable steps to ensure that the information we hold about you is accurate, up-to-date, complete and relevant when we use it or disclose it. You should contact us if you think your personal information is wrong.

If you have a question about this Privacy Policy or want to access or otherwise correct your personal information you can contact us:

In Australia by:

- phoning (02) 8644 9700;
- writing to The Privacy Officer, ISS Facility Services Group, Level 6, 1 Thomas Holt Drive, Macquarie Park NSW 2113; or
- sending an email to dpo@au.issworld.com

In New Zealand by:

- phoning 0800 932 532;
- writing to The Privacy Officer, ISS New Zealand, 2 Arthur Brown Place Mt Wellington Auckland Private Bag 92239; or
- sending an email to dpo@au.issworld.com



A request for access needs to include a full description of the personal information requested. If you request information over the phone, we will ask you identity-related questions so we can verify your identity.

Your request for access to your personal information will be documented, as will details of the request and the identity of the ISS employee who gave it to you.

You have rights to access your information and correct it if it is inaccurate, out-of-date or incomplete. If you believe that the information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, you can request its correction. If we are satisfied that the information needs to be corrected, we will take reasonable steps to ensure that information is corrected and notify you of the correction. If we correct your information and it is information we have provided to others, we will notify them of the correction where we are required to do so by the Privacy Act.

There may be circumstances in which we may have to refuse a request for correction. In such a case you can request that we include a statement with that personal information that you made a request for correction.

You will not be charged for accessing or correcting your information. You may be charged for reasonable costs incurred by us in the processing of, and response to, your access request, including photocopying, supplying written reports, administration and postage.

11. How we will respond to your request

We will acknowledge receipt of your request within 5 working days of receiving your request. We will do our best to deal with your request within 10 working days. If we cannot help with your request, you will receive a written explanation as to why and details of what you can do to take the matter further if you are not satisfied with our response.

12. Do you want to contact us anonymously?

You can certainly contact us anonymously. If you choose not to be identified, however, we are limited in our ability to provide you with the services or information you require.

13. Can you complain about a breach of privacy?

If you want to complain about a privacy breach, you can contact us:

In Australia by:

- phoning (02) 8644 9700;
- writing to The Privacy Officer, ISS Facility Services Group, Level 6, 1 Thomas Holt Drive, Macquarie Park NSW 2113; or
- sending an email to dpo@au.issworld.com

In New Zealand by:

- phoning 0800 932 532;
- writing to The Privacy Officer, ISS New Zealand, 2 Arthur Brown Place Mt Wellington Auckland Private Bag 92239; or
- sending an email to dpo@au.issworld.com



We will do our best to resolve your complaint as quickly as possible. If you are not satisfied with the result of your complaint to us, you can refer your complaint:

In Australia, to the:

Office of the Australian Information Commissioner

Phone: 1300 363 992

Post: GPO Box 5218, Sydney NSW 2001

Online: oaic.gov.au (Privacy Complaint Form)

In New Zealand, to the:

Privacy Commissioner

Phone: 0800 803 909

Post: PO Box 10-094, The Terrace, Wellington 6143

Online: <https://privacy.org.nz/contact-us/>

14. Need further information?

For more information about privacy in general, you can visit (as applicable) the:

- Office of the Australian Information Commissioner's website at oaic.gov.au; and
- New Zealand Privacy Commissioner's website at <https://privacy.org.nz/>

15. Updating our Privacy Policy

We may review, amend or revise our Privacy Policy and the way we handle personal information from time to time. We will post the updated Privacy Policy on our website at www.au.issworld.com and its terms will take effect from the date of posting.

SCOTT DAVIES
CHIEF EXECUTIVE OFFICER
ISS AUSTRALIA and ISS NEW ZEALAND
5 FEBRUARY 2019