

# **PRIVACY POLICY**

## 1. Respecting Your Privacy

Envirolab Group and its network of related parties, Envirolab Services Pty Ltd, Envirolab Services (WA) Pty Ltd trading as MPL Laboratories ('the Envirolab Group', 'us' 'our' 'we') are committed to protecting your personal information and complying with privacy laws, which set out standards for the management of personal information.

This privacy policy is aligned with the Australian Privacy Principles (APPs) as set out in the *Privacy Act 1988* (Cth) (*Privacy Act*) and other applicable laws, such as the *Spam Act 2007* (Cth). The APPs are designed to protect the confidentiality of information and the privacy of individuals by regulating the way personal information is collected, used, disclosed, and managed. Personal information is information we hold, which is identifiable as being about you.

This policy explains the types of personal information we may collect and hold, how that information is used and with whom the information is shared. It also sets out how you can contact us if you have any queries or concerns about this information.

#### 2. Collection of Personal Information

The type of personal information we collect depends upon your relationship with us. When doing business with us, you may need to prove your identity. In some circumstances, the law requires you to do so. We may collect and hold information about you including:

- Contact information and identification such as your name, contact number(s), email address(es), residential and/or business address(es), demographic information (such as postcode, gender);
- HR information such as a copy of a passport/driver's licence and/or electronic fingerprint scan collected as part of employment eligibility verification and timeclock logging;
- Payment and billing details (such as credit card, credit information, financial details) and other payment-related information, which we use to invoice you for services and to process payments;
- Details regarding conversations we have had with you;
- Information collected from marketing campaigns, research, client feedback surveys, your interactions with us including via social media, or publicly available information that you post or publish; and
- Other information relevant to you that relates to the Company.

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If you do not wish to provide particular information, we may not be able to respond to your query, assess your enquiry for a product or service, deliver our services, provide you with product information, events and/or accept promotion entries and information relating to other areas of our business functions and activities. Envirolab does not collect unsolicited information.

#### 3. How Do We Collect Personal Information?

The personal information we collect, and hold is what is reasonably necessary for our business functions and activities. Our collection and holding of personal information occur in a variety of ways, including when you interact with us electronically or in person, when you access our website and portals, and when we provide our services to you. For circumstances where we may receive personal information from third parties, we will protect it as set out in this Privacy Policy.

#### 4. Use and Disclosure of Personal Information

Personal information provided to Envirolab may be shared with any of our employees, insurers, professional advisors, agents, suppliers or subcontractors, insofar as reasonably necessary for the purposes set out in this Policy. Personal information is only supplied to a third party when it is required for the delivery of our services. Envirolab takes all reasonably practical steps to keep such information strictly confidential.

Information may be provided to third parties where any functions or services relating to the purpose for which the personal information is collected are being outsourced or you would reasonably expect us to disclose it to a third party for a particular purpose. For example, we may disclose your personal information to our:

- Independent consultants working with us to verify the security of our systems, including the review of the platform or system architecture, firewall configurations, network device security and web application security;
- Credit providers (disclosed and undisclosed);
- Data processing and payment providers;
- Financial services and banking providers;
- Auditors, lawyers and other professional service firms;
- Marketing/advertising agencies and other marketing services providers;
- Print/mail/digital/imaging/document management service providers; and
- Web analytics service.

In the event of a restructure, merger or acquisition, or in the sale of all or a portion of assets, Envirolab may transfer any and all personal information we have collected from you to a relevant third party. However, personal information will always remain subject to this Privacy Policy.

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Envirolab may also be required to disclose your personal information if:

- Required by law;
- Required for the investigation of an unlawful activity or other investigative activities; or
- Necessary to lessen or prevent a serious and imminent threat to an individual's safety or serious threat to public health or public safety.

In some cases, Envirolab may disclose your personal information to overseas recipients. To safeguard your privacy, we will take reasonable steps to ensure the overseas third party uses the personal information for the purpose intended and does not breach the APPs.

Some personal information will not be released or used by the company without express permission of the employee (unless directed by legal requirements). Personal information such as an employee passport or fingerprint data would be examples of such information.

## 5. Marketing and Communications

From time to time, Envirolab may use your personal information to contact you by mail, SMS, telephone, email or online to inform you about new services, offerings, surveys, promotions and newsletters. In so far as the law allows us to, we are likely to market to you unless you tell us otherwise. At the same time, we will give you the opportunity to opt-out of direct marketing communications. If you do not want to be contacted for marketing purposes, you can also advise by contacting us through one of the methods set out below. Upon receipt of notice, we will take immediate steps to ensure that you do not receive any such direct marketing information in future.

## 6. Career Applications

Employment applications and resumes collected by us are safely and securely stored and only used for the purposes for which it was collected.

#### 7. Cookie Collection and Usage

Envirolab may use cookies on our website or apply other automated means, including server logs or proxy logs, to track site visitor activity and collect site data. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes. The content may be our own or may be the content of others in which we have an interest, such as banner advertisements. Most web browsers are set to accept cookies.

Envirolab uses <u>Google Analytics</u>, a web analytics service provided by Google Inc. (Google). Google Analytics uses cookies and JavaScript code to enable the analysis on website usage and other online facilities.

You can choose to disallow cookies by changing settings on your web browser. Please note, if you do this, you may not be able to access and use our website and other online facilities at their complete level of functionality. By using these websites and online facilities, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

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Like many website operators, we collect information that your browser sends whenever you visit our website (Log Data). This Log Data may include information such as your computer's Internet Protocol (IP) address, browser type, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages and other statistics.

We do not combine the anonymous information collected through Google Analytics with personally identifiable information.

Our website may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please note, Envirolab is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of any other website that collects personal identifiable information.

## 8. Communications Quality and Access to Personal Information

Envirolab takes all reasonable precautions to ensure that the personal information collected, used and disclosed is accurate, complete and up-to-date. The accuracy of the information is, however, dependent to a large extent on the information with which we are provided. Envirolab strongly recommends that you:

- Advise us if there are errors in your personal information at any time
- Keep us up to date with changes to your personal information.

Wherever possible, Envirolab will correct any error on request. In some cases, we may ask for a written request for correction.

Individuals have a right to access their own personal information in a record that is in the custody or under the control of Envirolab, subject to some exceptions. For example, a request to access information that would reveal the personal information of another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may request access to your personal information by writing to us (contact details below). You must provide sufficient information in your request to allow us to identify the information you are seeking.

### 9. Security of Personal Information

Envirolab protects personal information in a manner appropriate for the sensitivity of the information. We make reasonable effort to prevent any loss, misuse, disclosure or modification of personal information.

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The security of personal information is important to us, however, no method of transmission over the Internet, or method of electronic storage, is absolutely secure. Whilst we attempt to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. The Envirolab websites are configured to use Secure Sockets Layers (SSL) encryption. Once we receive your transmission, we will take reasonable steps to preserve the security of the information in our systems.

Your personal information is stored behind the enterprise firewall and daily backups of personal information is conducted. Additionally, off-site backups of this information are maintained.

We use appropriate security measures when destroying personal information, including shredding paper documents, records, and permanently deleting electronic records on their statutory expiration.

We retain personal information as long as reasonably necessary to fulfil the purposes for which the information was collected or for legal or business purposes.

You are solely responsible for the maintaining the secrecy of any passwords and other account information pertaining to our platform, apps or services.

## 10. Changes to This Privacy Policy

This Privacy Policy is current at the date below. We may, without notice, change this Policy periodically or update this Policy as required. Please visit our website periodically to remain up to date with such changes.

#### 11. Contact Us

If you have any questions about our Privacy Policy, or any issues or complaints about how we have collected, used, stored, handled and/or disclosed your Personal Information, please contact our Head Office at:

Envirolab Services Pty Ltd 12 Ashley Street, Chatswood, NSW Australia

Email: enquiries@envirolab.com.au

Telephone: (02) 9910 6200

#### More information

More information about privacy law and privacy principles is available from the Privacy Commissioner. The Privacy Commissioner may be contacted at <a href="www.oaic.gov.au">www.oaic.gov.au</a> or emailed at enquiries@oaic.gov.au

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