

PRIVACY POLICY

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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**) complies with the provisions of the *Privacy Act 1988 (Cth)* (**Act**), in relation to the collection, storage, use and disclosure of personal information of individuals. It does not apply to employee records which are generally excluded from the requirements of the Act.

Whose personal information does Sodexo collect?

Individuals from whom Sodexo collects personal information include:

- clients;
- customers/employees/contractors of its clients;
- suppliers;
- contractors; and
- potential employees.

Why does Sodexo collect your personal information?

Sodexo will only collect personal information about you that is necessary for one or more of its legitimate business functions or activities (**primary purpose**). These functions or activities may include:

- providing on-site service solutions such as catering, healthy lifestyle services, soft and technical facilities and maintenance services;
- administering and managing those services, including charging, billing and collecting debts;
- recruitment of employees, contractors and consultants;
- to inform you of our products and services that we believe may be of interest to you; and
- engaging service providers, suppliers or contractors.

In collecting personal information, Sodexo will act lawfully and fairly.

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

What personal information does Sodexo collect?

Information Sodexo may collect about you include your:

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

How does Sodexo collect personal information?

Sodexo 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.

Sodexo may also collect personal information about you from third parties, for example from:

- third parties who conduct pre-employment medical assessments on behalf of Sodexo;
- third parties who are Sodexo clients, where the collection is required for the purpose of Sodexo carrying 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 a Sodexo service);
- third parties who book a service on your behalf with Sodexo; and
- third parties who provide Sodexo with a service, but only where related to that service

Collecting sensitive information

The Privacy Act also outlines sensitive information as a subset of personal information. Under the 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.

Sodexo will only collect sensitive information where we have your consent.

Use and disclosure of personal information

Generally Sodexo will only use and disclose your personal information for the purpose for which it was collected. We may use and disclose your personal information for another purpose if you have consented to the disclosure or the secondary purpose is related to the primary purpose and might reasonably be expected by you.

For example, we may disclose your personal information to:

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

If the personal information we collect about you is sensitive information, we will only use or disclose your personal information for a secondary purpose if it is directly related to the primary purpose.

Sodexo may use or disclose personal information should it be required to do so by law or use or disclosure is permitted by the Act (eg law enforcement or public safety).

Data Quality

Sodexo will take all reasonable steps to ensure the personal information we collect, use or disclose is accurate. We will take all reasonable steps to correct any inaccurate personal information of which we are made aware.

Storing personal information

Sodexo stores personal information in different ways, including paper and electronic form. The security of personal information is important to Sodexo and Sodexo takes reasonable steps to protect personal information from misuse, interference and loss and from unauthorised access, modification or disclosure. If no longer required, Sodexo will destroy or de-identify 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 Sodexo provide access to personal information held by us about you. Sodexo may require reimbursement of its reasonable costs in providing such information.

If Sodexo refuses access to information, we will provide an explanation for the decision and of the exceptions relied upon for refusing access.

Identifiers

Sodexo will not use identifiers issued by government agencies (eg Tax File Number; Medicare Number) as its own identifier for you. Sodexo will only use or disclose identifiers in the manner permitted by the Act.

Anonymity

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

Disclosure of personal information overseas

Sodexo operates across Australia, is part of a worldwide group of companies and utilises 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. Further, Sodexo may use its servers in the United States and France to store your personal information.

Who to contact?

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

The Privacy Officer
Sodexo Australia Pty Limited
Level 8, 607 St Kilda Road
Melbourne Vic 3004

T: (03) 9880 6300

If you wish to lodge a complaint, please provide us with your contact details and information regarding the complaint. We may contact you in order to obtain further information. Sodexo will investigate the complaint and provide you with the outcome of our investigations 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).

Changes to this Privacy Policy

Sodexo 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.