



VICTORIAN CHEMICAL COMPANY PROPRIETARY LIMITED
PRIVACY POLICY

The Victorian Chemical Company Proprietary Limited (VICCHEM) is committed to protecting personal information in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs). This Policy explains how we collect, use, disclose, and safeguard personal information, and how individuals may access or correct their information or raise concerns.

1. Scope

1.1 Who does this Policy apply to?

This Policy applies to any individual whose personal information is collected, held, or processed by VICCHEM in the course of our business and employment activities.

1.2 What information is covered?

- **Personal Information:** Information or opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.
- **Sensitive Information:** A subset of personal information including information or opinion about an individual's:
 - racial or ethnic origin
 - political opinions
 - membership of a political association
 - religious beliefs or affiliations
 - philosophical beliefs
 - membership of a professional or trade association
 - membership of a trade union
 - sexual orientation or practices
 - criminal record
 - health or medical conditions
 - biometric details used for biometric identification.Sensitive information is subject to stricter handling requirements.

1.3 What information is not covered?

Information that has been de-identified so that individuals are no longer reasonably identifiable is not considered personal information.

1.4 Employee Records Exemption (Privacy Act)

Under the Privacy Act, certain employee records held by private-sector employers may be exempt from the Australian Privacy Principles where they relate directly to a current or former employment relationship. This exemption does not apply to job applicants, contractors, or other individuals.

2. Collection of Personal Information

VICCHEM collects personal information in various ways, including:

- Supplying goods and services and managing customer accounts
- Engaging suppliers, contractors, and personnel
- Responding to enquiries about our products and services
- Operating our websites and digital platforms
- Conducting promotions, competitions, and events

Types of information collected may include names, contact details, employment history, qualifications, date of birth, driver's licence details, payroll information (e.g. bank account details), photographs, videos, and

other information necessary for business purposes. VICCHEM will only collect personal information by lawful and fair means and not in an unreasonably intrusive way.

Where required, VICCHEM will take reasonable steps to notify individuals of:

- the purpose of collection;
- the consequences of not providing the information;
- how to access and correct their personal information;
- how to make a complaint;
- whether personal information may be disclosed overseas; and
- how to access this Privacy Policy.

In some cases, information may be obtained from third parties (e.g. distributors, contractors, agencies we engage, publicly available sources).

Unsolicited personal information will be destroyed or de-identified if VICCHEM could not lawfully have collected it under the APPs.

Individuals may interact with VICCHEM anonymously or using a pseudonym, where lawful and practicable.

2.1 Collection of Sensitive Information

VICCHEM will only collect sensitive information with consent, where reasonably necessary for our functions, or where permitted by law (e.g. to prevent serious threats to health or safety, or in connection with legal proceedings).

3. Use of Personal Information

VICCHEM may use personal information for:

- The primary purpose for which it was collected (e.g. delivering goods or services);
- Related secondary purposes that individuals would reasonably expect; and
- Direct marketing, unless an individual opts out. Requests to opt out can be made at any time via the contact details provided in the relevant marketing or through the contact details provided below. Opt-out requests will be actioned within a reasonable time.

4. Disclosure of Personal Information

VICCHEM respects confidentiality and will only disclose personal information:

- For the primary purpose of collection, or a related secondary purpose reasonably expected (e.g. to delivery service providers)
- Where the third party agrees to handle information in accordance with the APPs
- Where required or authorised by law
- To protect VICCHEM's legal rights or defend claims
- To prevent or lessen serious threats to health or safety
- As otherwise permitted under the Privacy Act

VICCHEM will never sell personal information without consent.

4.1 Overseas disclosure

VICCHEM does not disclose personal information to overseas recipients.

5. Information Security

VICCHEM takes reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure by having in place access controls, password protected systems and employee training.

When personal information is no longer required, for the purpose for which it was collected, and subject to any legal retention obligations, VICCHEM will take reasonable steps to destroy or permanently de-identify it.

6. Access and Correction

6.1 Access

Individuals may request access to their personal information by contacting the Privacy Officer in writing.

Requests may be refused where:

- The request is frivolous or vexatious

- Access would unreasonably impact another person's privacy
- Access would pose a serious threat to health or safety
- Access would prejudice Vicchem's legal rights
- Other lawful grounds apply

VICCHEM may charge a reasonable fee for providing access, disclosed in advance.

6.2 Correction

VICCHEM will take reasonable steps to ensure personal information is accurate, complete, and up to date. Individuals may request corrections by contacting the Privacy Officer.

Where VICCHEM corrects personal information, we will take reasonable steps to notify any third parties to whom the information was previously disclosed, where required by law.

7. Complaints

Complaints about breaches of this Policy, the APPs, or applicable codes may be made in writing (by post or email) to the Privacy Officer. VICCHEM will acknowledge receipt of a complaint within 7 days and will investigate and respond as soon as practicable. If an individual is not satisfied with our response, they may contact the Office of the Australian Information Commissioner (OAIC).

Privacy Officer:

Denise Nezis
Victorian Chemical Company Pty Ltd
83 Maffra Street
Coolaroo VIC 3048
Phone: +61 3 9301 7000
Email: Privacy@vicchem.com

8. Updates to this Policy

VICCHEM may update this Privacy Policy from time to time. The current version is made available on our website.



Andrew Killick
Chairman of the Board