

SCOPE

This policy relates to all Directors, employees, volunteers, and contractors. For the purpose of this policy, the term 'employee' will be used to cover these individuals.

This policy relates to the Delta Group of companies including Delta Panels Pty Ltd (ABN 11 147 861 292), Delta Metal Products (ABN 33 648 648 837), & The Trustee for Delta Insulation Systems (ABN 48 672 843 411). For the purpose of this policy, the term 'Delta' will be used to collectively refer to all Delta Group companies.

PURPOSE

Delta is committed to honouring its duty of care in relation to safeguarding customer and employee personal information and communications and disclosures and ensuring procedures are in place and followed to protect personal and/or sensitive information. Delta takes privacy seriously and is committed to complying with Australian privacy laws. This policy sets out how Delta and its related entities (we) collect, hold and disclose personal information.

This policy outlines Delta's practices and standards in relation to maintaining customer and employee privacy. Importantly it also outlines Delta's responsibilities in relation to:

- a. where disclosure/s of customer and employee personal and/or sensitive information is not regarded as a breach of confidentiality; and
- b. where extra-ordinary limitations exist in relation to admissibility of evidence and confidentiality in respect of customer orders.

POLICY STATEMENT

This Privacy Policy explains how Delta handles information and complies with the requirements of the Australian Privacy Act 1988 (Cth) ("Privacy Act"), 13 Australian Privacy Principles (APPs) and relates to Delta's collection and handling of information that is covered by the Privacy Act, and regulates how Delta may collect, use, disclose, and store personal information and how individuals may access and correct personal information which Delta holds about them, but is not intended to cover other types of information not covered by the Privacy Act.

Delta acknowledges that Customer and employee privacy is integral to professional practice and provision of products and services and as such the 13 Australian Privacy Principles are adhered to in the collection, security, access, correction, use and disposal of Customer and employee personal and/or sensitive information including:

- a. Open and transparent management of personal information
- b. Anonymity and pseudonymity
- c. Collection of solicited personal information
- d. Dealing with unsolicited personal information
- e. Notification of the collection of personal information
- f. Use or disclosure of personal information
- g. Direct marketing
- h. Cross-border disclosure of personal information
- i. Adoption, use or disclosure of government related identifiers
- j. Quality of personal information
- k. Security of personal information
- l. Access to personal information
- m. Correction of personal information

TERMS USED – SEE ANNEX A

OPEN AND TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION

Having the confidence of Customers and employees is a professional privilege and will be respected at all times. This includes the right of Customers to provide informed consent to the collection of information as part of the initial contracting of services.

Delta will make its Privacy Policy available to employees and Customers through its web page and to employee through the Intranet. Employees and Customers will be provided with the details of the kind of personal information that will be collected about them in order that services can be provided and how this information will be collected, stored and used.

Information collected about Customers will be for the prime purposes of taking customers' orders for Delta products.

Information collected about Employees will be for the prime purpose of recording information related directly to their employment, and work, with Delta.

ANONYMITY AND PSEUDONYMITY

Delta will, if provided with a Purchase Order, allow Customers to place orders for Delta products anonymously or through using a pseudonym, provided that this is lawful and practicable. This option is subject to the following limited exceptions: where it is impracticable for Delta to deal with an individual or business who has not identified themselves, or where the law or a court/tribunal order requires or authorises Delta to deal with individuals or businesses who have identified themselves. An individual or business who chooses to order Delta products anonymously will still be required to provide a bona fide Purchase Order and be subject to a credit check.

Customers have the right to remain anonymous, or to use a pseudonym when dealing with us in respect of a particular matter. However, this only applies where it is practicable for us to deal with customers anonymously or under a pseudonym, such as a general enquiry.

ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS

Delta will not adopt, use or disclose a government- related identifier unless an exception applies. For a definition of the terms 'identifier' and 'government- related identifier' please refer to Schedule 1 of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth).

WHY WE COLLECT PERSONAL INFORMATION

We collect personal information in order to:

- a. provide products and services to our customers;
- b. communicate with our customers and contacts;
- c. manage and account for our products and services;
- d. improve our products and services;
- e. market our products and services;
- f. send invitations to our events;
- g. manage our employees;
- h. manage and deliver our loyalty programs or schemes;
- i. fulfil our legal obligations;
- j. exercise our legal rights and to issue or defend legal proceedings;
- k. generally carry on our business; and
- l. assess our customers for creditworthiness or continuing creditworthiness as we reasonably see fit from time to time, for the purposes including but not limited to:
 - i. obtaining and exchanging information with a credit reporting agency, credit provider, credit insurer or insurance broker;
 - ii. passing the information on to a debt collector or solicitor;
 - iii. exchanging further personal information, including consumer and/or commercial credit information, with another body for any use reasonably connected with the provision of credit or the collection of debts.

Our auditors, insurers and legal and other professional advisors may also access our records, but only to protect our interests and to ensure that we comply with our obligations.

TYPES OF PERSONAL INFORMATION COLLECTED AND HELD

Delta will not collect personal or sensitive information unless the information is reasonably necessary for the delivery of services to Customers and employees, by Delta. Sensitive information must only be collected with an individual's consent.

Delta will record e-mail addresses only after direct receipt of a message. E-mail addresses will not be added to a mailing list unless they have been provided in order to subscribe to Delta's mailing list.

Personal information collected by e-mail or electronic forms will be used only for the purpose for which it was provided and will not be disclosed without consent, except where authorised or required by law. Delta collects and holds information from employees, Customers and Certification authorities. We collect and hold this information when it is necessary for business purposes.

WHAT PERSONAL INFORMATION DO WE COLLECT AND PROVIDE?

We collect the following information about an individual:

- a. Name;
- b. Address;
- c. Delivery address;
- d. Phone numbers and fax number;
- e. Email address.
- f. Date of birth;
- g. Driver's licence and other relevant qualifications and licence details;
- h. Financial information including bank account details and credit card details;
- i. Business details including Australian Business Number (ABN)
- j. Credit references and other information relevant to credit worthiness including information about a customer's credit liabilities, repayments and defaults;
- k. Financial information;
- l. Employment information;
- m. Medical information, (eg, accident details, fit for duty details, allergies, drug and alcohol testing records and COVID-19 vaccination status, etc); and
- n. Other transactional information

We also collect any other information necessary or reasonably required to provide the specific products and services our customers require.

We do not collect any sensitive personal information such as sexual preferences or practices, criminal records, health status, race, culture, religion, philosophical beliefs, political opinions or any other information which is not relevant to the conduct of our business and our relation with our customers.

Employees with ongoing medical/work cover cases do have health status noted in our system. We also record medical restrictions, history and allergies.

We may disclose information regarding the provision of credit, the amount of credit provided, the terms and conditions of credit, when the credit account was opened and closed and information about repayments and defaults.

HOW WE COLLECT PERSONAL INFORMATION

We collect personal information directly from our customers when they:

- a. request a quote or other information from us;
- b. place orders for products and services with us;
- c. open a credit account with us or when reviewing our customer's credit account;
- d. apply for or use any Delta loyalty card or scheme; and
- e. provide feedback to us.

We also collect personal information from individuals when they meet with us, communicate with us by letter, telephone, email or fax, give us a business card, subscribe to our publications, or submit information through our website. We may ask other people to analyse traffic on our website and they may use cookies to do so.

We collect personal information about our customers from external sources such as:

- a. Credit or trade referees;
- b. Credit reporting agencies;
- c. Other credit providers;
- d. Co-applicants;
- e. Guarantors/proposed guarantors;
- f. Referees;
- g. Public sources such as telephone listings and internet; and
- h. Our service providers involved in helping us to provide credit or to administer credit facilities, including our debt collectors, credit insurer, insurance broker and legal advisers.

HOW WE DEAL WITH PERSONAL INFORMATION WE DIDN'T ASK FOR

Sometimes we receive information we didn't directly seek out. Where we receive this unsolicited personal information about individuals, we will consider whether the information is reasonably necessary for our functions and if we are permitted to hold the information in the same way as other information the individual has directly provided to us. If we can, we will handle the information in the same way we do with other information we seek from the individual. The way personal information is stored on the Delta servers means that electronic information cannot be destroyed or de-identified once it has been exposed to at least one backup.

CORRECTION OF PERSONAL INFORMATION

Delta will take reasonable steps to correct personal information to ensure that, having regard to the purpose for which it is held, it is accurate, up-to-date, complete, relevant and not misleading, if either:

- a. Delta is satisfied that it needs to be corrected, or
- b. an individual requests that their personal information be corrected.

Delta will endeavour to notify other relevant organisations (such as referral agencies or other) that have been provided with the personal information of any correction, if that notification is requested by the individual.

Delta will respond to a correction request or a request to associate a statement by the individual within a reasonable period after the request is made and will not charge the individual for making the request, for correcting the personal information, or for associating the statement with the personal information.

When Delta refuses an individual's correction request, Delta will provide the individual with written reasons for the refusal and notify them of available complaint mechanisms.

DEALING WITH UNSOLICITED PERSONAL INFORMATION

When a Delta employee receives unsolicited personal information, they must determine whether it would have been permitted to collect the information under Principle 3, 'Collection of Solicited Personal Information'. If so, Principles 5 to 13 will apply to that information.

If the information could not have been collected under Principle 3, and the information is not contained in a Commonwealth record, the Delta employee in possession of that information must notify their manager as soon as practicable to determine whether the information should be destroyed or de-identified and if it is lawful and reasonable to do so.

NOTIFICATION OF THE COLLECTION OF PERSONAL INFORMATION

Employees and Customers will be provided with the details of the kind of personal information that will be collected about them in order that services can be provided and how this information will be collected, stored and used.

Delta employees will be provided with the details of the kind of personal information that will be collected about them as part of their employment with Delta.

USE OR DISCLOSURE OF PERSONAL INFORMATION

Delta will collect information for the following uses:

- a. to identify Customer/individual details for the purpose of delivering Delta products.
- b. to contact Customer/individual details for the purpose of delivering Delta products.
- c. to maintain records related to the contractual relationship between Delta and employees.
- d. to report statistics to Delta Management and auditing bodies.
- e. oral or written feedback required in referring an individual for further services.
- f. informing and referring jobs to contractors who are attending to Delta requirements.
- g. Discussion of specific details during employee supervision, training and development.
- h. To seek follow up on employees performance evaluation.
- i. For reporting of serious matters as required by law.

Delta endeavours, so far as is reasonably practicable, not to disclose information to other organisations unless:

- a. it is to protect the personal health information, rights, property or personal safety of any Delta Customers, member of the public, or supplier to Delta or the interests of Delta; or
- b. some or all of the information may be transferred to another affiliated organisation as part of Customer order delivery, or some or all of Delta's business; or
- c. the owner of the information gives written consent; or
- d. such disclosure is otherwise required or permitted by law, regulation, or rules.

We require our external service providers such as contractors to adhere to our Privacy Policy and not to keep, use or disclose information we provide to them for any purposes that are not consistent with this Policy.

NON-DISCLOSURE OF PERSONAL INFORMATION

If we request personal information and it is not provided, we may not be able to:

- a. provide products or services or otherwise assist the relevant customer;
- b. manage or administer our customer's account;
- c. verify the customer's identity or protect against fraud;
- d. provide benefits to customers through our loyalty schemes or programs; and
- e. inform about product or services that might better meet our customer's needs.
- f.

GENERAL USE AND DISCLOSURE

We use and disclose personal information for the primary purpose for which it was collected, related purposes and other authorised purposes. In general, we use and disclose personal information for the purposes set out above in the section 'why do we collect personal information'.

USE AND DISCLOSURE FOR DIRECT MARKETING

As part of our functions and business activities and to promote our products and services to customers, we may use personal information provided to us for the purposes of direct marketing. Direct marketing includes, but is not limited to, sending our customers and/or contacting our customers in relation to promotions and information about our products and services or to send invitations to our events.

We will only use an individual's personal information to market our products or services or to send invitations to our events where we give that individual an opportunity to request us not to use the information for such purposes.

Delta will only use or disclose personal information for direct marketing purposes where the individual has either consented to their personal information being used for direct marketing or has a reasonable expectation that their personal information will be used for this purpose. Individuals will be provided with opt-out mechanisms in these circumstances. Delta will seek Customer permission for the use of personal or private information to undertake research and/or evaluation activities.

We will not use a customer's personal information for such purposes if the Customer requests us not to do so. A Customer can opt out of receiving direct marketing communications at any time. Please see the section 'contact us' for our contact information.

TO WHOM DO WE DISCLOSE PERSONAL INFORMATION?

We may disclose personal information to:

- a. other persons in connection with the provision of our goods and services including our customers and suppliers and their employees, insurers, contractors and advisers;
- b. our employees, our related entities and employees of our related entities. This may include overseas recipients;
- c. credit reporting and debt collection agencies;
- d. other credit providers; credit insurers and credit insurance brokers; to cheque guarantee providers;
- e. joint credit account holders;
- f. guarantor(s) and any person who has provided security for our goods and services;
- g. courts, tribunals and regulators;
- h. anyone else whom the customer authorises us to disclose the information;
- i. otherwise authorised by legislation.

We may disclose personal information we collect to our contractors. For example, contractors may be engaged to provide products or services directly to our customers or to assist us in providing products or services. In addition, contractors may distribute some of our marketing material and other publications and maintain and develop our customer records and computer systems and website.

OUR WEBSITE

This Privacy Policy applies to any information we collect via our website www.deltapanel.com including information you provide to us such as when you make an enquiry.

ACCESS TO INFORMATION

Delta Customers, contractors, and organisations outside of Delta will sometimes have access to information held by Delta, such as Delta Customers and worker details, such as names and contact details.

We will provide access to information upon request by an individual, except in situations where release is unauthorised by the owner of that information and in situations where granting such access would infringe another person's privacy or a customer or supplier's request for anonymity.

When you make a request to access information, we will require you to provide some form of identification (such as a driver's licence, or passport) so we can verify that you are the person or customer or supplier's authorised representative to whom the information relates.

If you believe that information we hold about you, or the organisation you are authorised to represent, is either incorrect or out of date, or if you have concerns about how we are handling your information, please contact us and we will try to resolve those concerns.

If at any time you want to access information you believe we hold, you may contact us by emailing us at info@deltapanel.com.

TRANSFER OF INFORMATION OUTSIDE AUSTRALIA/CROSS-BORDER DISCLOSURE OF PERSONAL INFORMATION

In addition to disclosures permitted under this Privacy Policy, Delta may disclose information to organisations such as our ISO Certification Body, within the Certification global network. Some International ISO Standards Certification and Accreditation organisations may not be Australian entities and may not be regulated by the Australian Privacy Act, and accordingly may not be subject to privacy laws that provide the same level of protection as Australia.

Any such disclosure, or transfer, of information does not change our commitment to safeguard information, consistent with our management system information security controls.

If for any circumstance Delta was to disclose personal information to an overseas recipient, Delta will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles (other than APP 1) in relation to that information.

QUALITY AND INTEGRITY OF PERSONAL INFORMATION

Delta will take reasonable steps to ensure the personal information it collects is relevant, accurate, up-to-date and complete. Delta will ensure that personal information is relevant, as well as, accurate, up-to-date and complete, having regard to the purpose of the use or disclosure.

- a. Customers can request to correct information of a minor nature such as their personal contact details through discussion with the Delta office.
- b. Customers can request to correct or amend more significant Customer information such as file notes on the grounds that it is inaccurate, incomplete, out-of-date or misleading. Approval for these types of changes can only be granted by the General Manager. Any such changes are to be clearly marked. Words changed are not to be deleted or documents are not to be removed from the file. One clear line is to be marked through the word or sentence so that the original text is readable, and the approved change is to be marked with a date and signature. (Liquid paper or similar product is not to be used).
- c. Request documents and processes must be documented with copies of all correspondence kept in a confidential and secure file.
- d. We take reasonable steps to ensure that the personal information we collect is accurate, up to date and complete and that the personal information we use or disclose is, having regard to the purpose of such. To that end, we encourage our customers to contact us to update or correct any personal information we hold about them.
- e.

SECURITY OF PERSONAL INFORMATION

We take reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure. We store electronic information on secure servers in access controlled premises, and require all persons authorised to access such information to use logins and passwords to access such information.

Delta will endeavour to take all reasonable steps to keep secure any information which we hold, keeping the information accurate and up to date.

Delta will take reasonable steps to protect the personal information it holds from interference, in addition to misuse and loss, and unauthorised access, modification and disclosure.

We require all our employees and others to whom we disclose personal information, or whom may have access to personal information we collect, to protect such personal information from misuse and loss and from unauthorised access, modification or disclosure.

ACCESS TO PERSONAL INFORMATION

Customers

A customer may request access to personal information we hold about them. We may require a customer to verify their identity and to specify what information they require before any information is disclosed. Where a customer

requests access to their product order records, employees should refer the request to the General Manager for approval.

Employees

The Office and HR Manager or other Manager (eg, if production related) will review the file and assess any information that may compromise the possible safety, privacy or confidentiality of other persons and consider the request.

In the event the approval is granted, arrangements will be made with the employee for viewing their file in the presence of the Office and HR Manager.

Copies of documents in the file may be made with the approval of the Office and HR Manager.

The employee may have a legal advocate or appropriate support person with them at the time of viewing the file.

All records remain the property of Delta and may not be removed from Delta's premises.

What is Not Regarded as a Breach of Privacy and Confidentiality

The following activities are not considered to be a breach of confidentiality or privacy as they are necessary for the proper discharge of professional services by Delta:

- a. Discussion of specific details during supervision, training, or consultation on a employee or customer order related matter;
- b. Providing Delta employee access to customer documents in order to analyse or maintain records and report on delivery and order fulfillment on time, and customer order statistics to Delta Management, and during management system internal and external audits.
- c. Reporting of serious matters as required by law.
- d. Responding to a subpoena or court order to supply information, however it is noted that strict procedures are to be followed if a subpoena is served on any Delta's employee or the Organisation to produce documents and/or appear in court.
- e. The sharing of employee information with external agencies for employment - related matters, for example, workers compensation claims, industrial relations matters, employment checks.

We deal with all requests for access to personal information as required by law. We may charge a fee where we provide access to information to cover the cost of retrieval and the supply of this information. We will endeavour to process any request for access within 30 days of receiving the request from our customer. Some requests for access may take longer than 30 days to process depending upon the nature of the personal information being sought. We may refuse to provide access if we are not legally required to do so.

DENYING ACCESS TO PERSONAL INFORMATION

We are not always required to provide our customers with access to their personal information upon request. We may refuse access to personal information where the information relates to existing or anticipated legal proceedings, where denying access is required or authorised by law, or where the request for access is regarded as frivolous or vexatious. If we deny a request for access to or refuse a request to correct personal information we will provide the reasons for not doing so.

CORRECTION OF PERSONAL INFORMATION

We take reasonable steps to correct all personal information we hold to ensure that, having regard to the purposes for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

An employee or a customer may request corrections to personal information we hold about them. We deal with all requests for correction to personal information as required by law. We may refuse to correct personal information if we are not required by law to do so.

CONTACT US

To request access to or correction of personal information, to request not to receive marketing material or invitations from us, or to make a privacy complaint to us, please contact:

Delta Panels
731 Boundary Rd,
Richlands
Qld. 4077
Telephone: +61 07 3271 2170
Email: info@deltapanel.com

CONCERNS OR COMPLAINTS

If anyone wishes to make a complaint about this policy or our collection, use or disclosure of personal information, they should contact us in the first instance. We will investigate the complaint and try and resolve the complaint directly with the complainant.

If Delta becomes aware of any ongoing concerns or problems relating to our Privacy Policy, we will take these issues seriously and work to address any concerns that have been brought to our attention.

If you have any further queries relating to our Privacy Policy, or you have a problem or wish to make a complaint, please contact us on info@deltapanel.com or contact us via our **Complaints Handling** process.

If you are not satisfied with our handling of your concern or complaint you may make a complaint to the Australian Information Commissioner (OAIC). For information about how to make such a complaint, please refer to the OAIC website (www.oaic.gov.au).

Concerns or complaints in relation to management of Customer and employee personal and sensitive information should be directed to the General Manager.

IMPLEMENTATION

Responsibilities

- a. Administration of the Privacy Policy resides primarily with the Office and HR Manager, but all Managers are responsible for ensuring compliance.
- b. All Managers are responsible for ensuring employees are suitably trained in, and aware of the standards of privacy and confidentiality, and are monitoring that employees under their direction act according to this Policy; with support from the General Manager and Office and HR Manager as deemed necessary.
- c.

REVIEW AND AMENDMENT

This Privacy Policy may be updated from time to time to keep abreast of our changing operating environment or legislative changes. Each time this Policy is changed it is given a new version, by date if issue. It is not our policy to give any specific notices regarding changes to this Policy, other than posting the updated version on our website.

CHANGES TO THE PRIVACY POLICY

We reserve the right to make changes to this Privacy Policy from time to time and without notice by publication on our website. We recommend that our customers and other interested parties regularly review our privacy and credit reporting policy to ensure they are aware of any changes.

Policy Authorised by

General Manager

Effective from

1st August 2022

APPENDIX A

Background

This policy has been developed consistent with relevant Federal and State legislation. Key legislation underpinning this policy includes but is not limited to:

- a. Privacy Act 1988 (Cth)
- b. Information Privacy Act 2009 (QLD)
- c. Privacy and Data Protection Act 2014 (VIC)
- d. Crimes Act 1958 (VIC)

Terms Used

In this Privacy Policy, we use the following terms:

"Personal Information" as it is defined in the *Privacy Act 1988* (Cth) means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. whether the information, or opinion, is true or not; and
- b. whether the information, or opinion, is recorded in a material form or not.

Personal information also includes 'sensitive information' which is information such as your race, religion, political opinions or sexual preferences, biometric information used for biometric verification or identification, biometric templates and health information. Information which is 'sensitive information' attracts a higher privacy standard under the Privacy Act 1988 (Cth) and is subject to additional mechanisms for your protection.

"Sensitive information" means information or an opinion about an individual such as race or ethnic origin, political opinions/associations or religious or philosophical beliefs, criminal record, sexual preferences, professional or health information and records, criminal history checks, working with children checks, income and bank details, and grievances, etc. It includes personal and sensitive information that is maintained electronically, in case notes, employee files, on video, audio cassette, photographed, written/printed or verbal information given by, or about a Delta customer, or employee. It also includes professional opinion/s if the individual can be identified from that opinion/information.

"Health Information" as defined in the *Privacy Act 1988* (Cth) is a particular subset of 'personal information' and means information, or an opinion, about:

- a. the health (at any time) of an individual; or
- b. an individual's expressed wishes about the provision, to them, of health services; or
- c. a health service provided or to be provided to an individual that is also personal information.

Review and Amendment History

Date	Comment, Issue and Amendment History
01 st August 2022	Privacy Policy approved by the General Manager