

# Brambles

## Privacy Policy

Brambles Limited  
Instituted: 30 June 2022

## Privacy Policy

### Who are we?

Brambles Limited (ABN 89 118 896 021) and its related companies (**Brambles, we** or **us**) collect and use personal information in the course of their operations.

The Board has adopted this Privacy Policy to support Brambles' commitment to protect personal information in accordance with applicable privacy laws and the Brambles Code of Conduct. This Privacy Policy sets out how your personal information is collected and handled by Brambles.

Brambles may amend this Privacy Policy from time to time at our discretion and without notice. The latest version will be available on our website: [www.brambles.com](http://www.brambles.com).

### What privacy laws do we comply with?

Brambles is subject to the Australian *Privacy Act 1988* (Cth) (**Privacy Act**) and the *Australian Privacy Principles* (**APPs**) set out in the Privacy Act.

As Brambles operates in more than 50 countries, it is also subject to the privacy laws of those countries, many of which vary greatly in their scope and application. Where necessary, therefore, Brambles has adopted country-specific policies which deal with local privacy law requirements.

To obtain a copy of any of these country-specific policies, please contact [privacy@brambles.com](mailto:privacy@brambles.com).

### What types of personal information do we collect?

'Personal information' is any information or an opinion about an individual or a readily identifiable individual.

There is also a subset of personal information called 'sensitive information'. This includes health information about an individual or information about their race, membership of a professional or trade association, union membership or criminal record (amongst other things).

The types of personal information (including sensitive information) that Brambles collects will vary depending on the circumstances. We only collect and process personal information, however, in compliance with applicable local law and which is necessary for us to carry on our business, which is directly related to our business or which is relevant to our business relationship with an individual and, in each case, which is otherwise permitted or required by local law.

This personal information may be limited to your name and business contact details (such as your business email address; your job title or your business telephone number and address) or times you are available to receive services.

More detailed personal information may, however, be collected by us if, for example, you apply to work with us, you seek to provide your services to us or you wish to become one of our customers or otherwise carry on business with Brambles.

For example, we may collect your educational qualifications and work experience background in a resume you provide to us or information about your skills or experience if you seek to provide services to us. We may also obtain details about your business operations and credit history if you wish to become one of our customers.

We may also collect sensitive information in some circumstances where local laws allow this. For example, if you are employed by us and make a workers compensation claim, we may collect personal health information about you so we can process your claim. If you apply to work for us, you may be required to undergo a health assessment, or we may carry out background checks which may involve the collection of sensitive information. If you wish to become one of our customers, we may carry out a credit check on you or your business.

In some places where we carry on business, local laws may require us to collect personal information, including sensitive information.

In any case, further information related to personal information collection and processing will be provided through the specific informative privacy notices.

### **How do we collect personal information?**

The circumstances in which we collect personal information will vary. For example, we will collect personal information such as your name and contact details directly from you if you contact us by telephone, if you write to us (including by email, webforms, or facsimile) or if you see us in person. We also collect personal information from publicly available sources of information and from third parties such as employment recruitment, background verification and credit reporting agencies. We may only collect your personal information when it is reasonably necessary for, or directly related to, our functions or activities.

In some circumstances we may also collect sensitive information about you when you consent, or when the collection is authorised or required by law or when the collection is otherwise lawful under applicable privacy laws.

Where we receive personal information about you from a third party to be used for our own purposes as described in this policy, we will take reasonable steps at the time of or before the time of collection (or as soon as practicable after collection) to let you know that we have collected your personal information and the circumstances of the collection, as required by the applicable privacy law. Specific privacy related information could be provided through different channels such as, but not limited to, QR codes, corporate communications or website privacy notices.

You have the option of not identifying yourself or using a pseudonym when dealing with Brambles. If you choose this option, however, this may mean that it could be impracticable for us to respond to you or to have a business relationship with you.

Brambles also has a detailed policy regarding your privacy when browsing our website which can be found here: [Privacy Notice \(brambles.com\)](https://www.brambles.com/privacy-notice).

### **How do we use and disclose your personal information?**

Brambles only uses and discloses your personal information for the purpose for which it was collected, according to the specific informative privacy notice, as consented to by you or as permitted or required by law.

In order to use your personal information for the purpose for which it was collected, this may mean that your personal information will need to be disclosed to other companies within the Brambles Group and their employees.

Brambles also engages third party service providers to perform various services for Brambles including share registry, delivery, finance, legal, tax, audit and payroll services as well as various other contractors, service providers and consultants. It may be necessary for Brambles to disclose certain personal information to these third party service providers to enable them to carry out the services for Brambles.

We will only disclose your personal information as set out in this privacy policy and any specific privacy collection notice relevant to our service or engagement with you or to third parties as authorised or required by law or a court/tribunal order. In all other circumstances, we will disclose your personal information only with your prior consent.

If you are a job applicant, we also collect, hold, use and disclose your personal information to establish and maintain our relationship with you and to fulfill our duties under this relationship.

Your personal information will not be shared, sold, rented or disclosed other than as described in this policy in the sense set out in the Privacy Act and the APPs.

Brambles has in place appropriate technical, contractual, and organizational measures to protect your personal information when disclosing your personal information to third parties.

### **Disclosure of your personal information to an overseas recipient**

In disclosing personal information to other companies within the Brambles Group or to third parties, your personal information might be transferred overseas to some of the countries in which Brambles has operations. These are principally Australia, India, Romania, the United Kingdom and/or the United States of America.

Where Brambles discloses your personal information to an overseas recipient that is within the Brambles Group, it will be as if that personal information was disclosed within Australia and as such the Privacy Act and APPs will apply to how it is disclosed and overall managed.

However, if Brambles discloses your personal information to an overseas recipient who is outside of the Brambles Group, Brambles must take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to that information. Brambles will remain accountable for any acts or practices of the overseas recipient in relation to that information that would breach the APPs.

Brambles has in place a data transfer intragroup agreement with other Brambles Group entities, as well as contracts with external third parties that require such companies to only use the information for the purpose Brambles has provided it to them as part of their engagement and to maintain confidentiality of all information.

### **How do we protect your personal information?**

Brambles has policies and processes in place to protect your personal information from misuse, interference, loss or unauthorized access, modification or disclosure. These include training programs which aim to ensure that relevant employees are aware of any privacy obligations regarding personal information to which they may have access, and systems to limit the accessibility of personal information to those employees who need it to fulfil their role.

Brambles also takes reasonable steps to ensure that any third party service providers to whom Brambles discloses personal information have in place an appropriate privacy policy and procedures to meet the applicable privacy law requirements. In particular, if Brambles provides

your personal information to an 'overseas recipient', Brambles is responsible for the way that overseas recipient handles your personal information.

## **How to exercise your privacy rights**

Should you wish to access your personal information that is held by Brambles, please contact [privacy@brambles.com](mailto:privacy@brambles.com) or fill in our privacy intake webform by clicking [here](#). We will provide you with this information unless we are not lawfully permitted to do so. If you live in a country where there is a Data Protection Officer, you can also contact that officer. We will process your request within the applicable deadline and once we have confirmed your identity. If we refuse your request, we will explain why in writing. We will not charge an application fee to access your personal information, but we may charge a reasonable fee for giving access, including photocopying fees.

While Brambles takes reasonable steps to ensure that any personal information we hold is accurate, up-to-date and complete, you can request that we correct any errors relating to your personal information by contacting [privacy@brambles.com](mailto:privacy@brambles.com), by filling in our privacy intake webform [here](#) or, if you live in a country with a Data Protection Officer, by contacting that officer.

## **Contact for privacy issues and complaints**

If you have any queries regarding this Privacy Policy or any complaints that Brambles has breached any of its privacy obligations, please contact [privacy@brambles.com](mailto:privacy@brambles.com) or report it through our Speak Up channel by filling in the intake webform [here](#) or by phone using your local or toll-free numbers listed [here](#). In order for us to investigate any complaint, you will need to provide us with sufficient details as well as any supporting information. We will notify you in writing following the outcome of our investigation. If you are not happy with the outcome, you can contact us or the Office of the Australian Information Commissioner: [www.oaic.gov.au](http://www.oaic.gov.au).

## **Workers compensation**

In some Australian States, Brambles is a workers compensation self-insurer. For the purposes of assessing, processing and managing a workers compensation claim made by you in our capacity as a self-insurer, we collect personal and sensitive information about you, including health information.

This could include information about your medical history and your medical condition. We collect this information from, amongst others, your solicitor, private investigators, previous employers, medical and other health professionals or government agencies. Our policy about the collection, use and disclosure of this information is set out in Schedule 1 to this policy.

## **Questions about Policy**

If you have any questions in relation to the operation of this Policy, you should contact the Company Secretary as follows:

Robert Gerrard  
Group Company Secretary  
Sydney, Australia  
Tel: +61 2 9256 5271  
Email: [robert.gerrard@brambles.com](mailto:robert.gerrard@brambles.com)



## **Schedule 1**

### **Australian Workers Compensation Self-Insurance Privacy Policy**

#### **Who does this apply to?**

Brambles Limited (ABN 89 118 896 021) (**Brambles, we, our or us**) is a company in the Brambles Group which, amongst other matters, is a licensed self-insurer for workers compensation purposes in some Australian States.

This policy outlines how we manage your personal information (including sensitive information) during the process we follow to assess, process and manage your workers compensation claim in our capacity as a self-insurer in some Australian states.

This policy should be read in conjunction with the Brambles Group Privacy Policy, of which this policy is a schedule.

#### **What types of personal information do we collect?**

The personal information we collect may include information about your medical history and medical condition, details of your doctors and other health professionals, information about the circumstances of your claim, injury or condition, the extent of your injury or condition and the effect your injury or condition has on your activities and capacity for work.

#### **How do we collect personal information?**

We may collect personal information from your solicitor or authorised representative, private investigators, previous employers, medical and other health professionals or government agencies.

The option you have under the Brambles Group Privacy Policy not to identify yourself or using a pseudonym when dealing with us will not apply when we collect your personal information to assess, process and manage your workers compensation claim. The reason for this is that it would not be practicable for us to deal with you on this basis during the claims handling process.

#### **How do we use and disclose your personal information?**

We may disclose your personal information to a government regulator, to other employees of the Brambles Group, to legal advisors, medical practitioners and other health service professionals, private investigators, any conciliation service, medical panel or similar body, a court or tribunal in the course of any proceedings under the applicable workers compensation legislation or any other person, organisation or government agency authorised by you, or by law, to obtain the information.

#### **How to access your personal information**

Please refer to the section on access set out in the Brambles Group Privacy Policy.

#### **Contact for privacy issues and complaints**

Please refer to the section on this issue set out in the Brambles Group Privacy Policy.