

Privacy Policy

Overview and Application

Monson (the Company/ the Employer) is committed to protecting your privacy. This policy sets out how the Company handles information about you and has been prepared in accordance with the *Privacy Act 1988* (Cth) and the *Australian Privacy Principles (APPs)* contained thereunder.

This policy is also available in the **Policies** section of our website:

<https://www.monson.com.au>

We may modify or amend this Privacy Policy from time to time. We will display a notice on our website indicating when any such revisions have been made.

Unless you notify us otherwise, we will assume that you have consented to the collection of all information which is provided to us for use in accordance with this Privacy Policy

Definitions

In this policy, a reference to "Monson" or "the Employer" or "the Company " is a reference to Gold Topco Pty Ltd (ACN 647 111 920) and each of its subsidiaries including Monson International Pty. Ltd., Monson Agencies Pty. Ltd. and Monson Agencies Australia Pty Ltd.

In this policy, a reference to "Monson employees" or "employees of Monson" or "employees" is a reference to all parties employed by Monson including all employees, managers and senior management.

Collection of personal information

Personal information is information or an opinion about an individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.

We may collect personal information from you when you:

- apply to any jobs with Monson
- start employment with Monson and throughout your employment [1]
- participate in any event, activity or competition organised or run by us;
- when you use our products and services, we will collect the personal information you provide to us during the ordering process or in the course of the engagement;
- visit our website; or
- contact us by any method, such as telephone, email, post, facsimile or in person, or otherwise as notified to you from time to time.

[1] If you are a current or past Monson employee, please also see our ICT Policy attached for further information regarding access and usage of any personal information via ICT systems and platforms.

The personal information you provide to us may vary depending on the nature of your interaction with us, but may for example include your name, date of birth, contact details and any communications you send to us.

If you are a potential or current Monson employee:

- the Company will require further personal information from yourself to meet their legal obligations such as to confirm your work rights and documents such as a copy of passport, birth certificate or citizenship certificate may be required. The Company may be legally obliged to conduct further checks such as VEVO (Verification of Employment Verification Online) if the employee holds a foreign passport.
- the Company will require other personal information for payroll purposes including, but not limited to bank account details, superannuation details, tax details and next of kin details.
- if you require to drive for work purposes, whether using a Company vehicle or personal vehicle, the Company will require a copy of your driver's licence and may use government's websites such as Department of Transport's website to check your driver's validity from time to time (if Employers are legally allowed to conduct this check in that state or country).

the Company will require a copy of other licences if required for your role and may be required to conduct further confirmation.

the Company may collect other personal information including but not limited to reference checks, qualifications, transcripts, certificates to confirm employees' educational background and ability to operate the Company may collect and use other personal information related to performance management, career development, training, disciplinary actions and any investigations.

The Company or the parties appointed by the Company such as medical clinics may also collect sensitive information, including but not limited to information about medical conditions, medical history, allergies. A full medical assessment and/or drug & alcohol policy may be required as a requirement for the role and/or client's requirement for the site employee will be attending. Please also see Drug & Alcohol Policy for further details. The Company may also require, collect and use additional personal details such as information provided during online Exit Interviews, Employee Recognition Platform or Employee Engagement Surveys. Further privacy information can be found on each of these platforms.

There may be occasions when we collect information about you from a third party. In such instances, we will determine whether we would have been entitled to collect such information from you and to the extent we would not have been entitled to do so, we will destroy or de-identify such information as soon as reasonably practicable.

Where possible, we will allow you to interact with us anonymously or using a pseudonym. For example, if you contact us with a general enquiry, we will not ask for your name unless we need it to adequately handle your enquiry.

However, for most of our functions and activities we usually need your name and contact information.

Our website

Our web servers may automatically collect information when you visit our websites, including:

- your IP address;
- the date and time of your visit;
- the parts of our website you access during your visit;
- your actions on our website; and
- the browser you are using.

In using our websites, your personal information may be collected through the use of cookies. These are small text files placed on your mobile device or computer by our websites which automatically collect information about you without you providing that information to us directly. Most browsers are set by default to accept cookies. However, if you do not wish to receive any cookies you may set your browser to either prompt you whether you wish to accept cookies on a particular site, or by default reject cookies.

Please note that rejecting cookies may mean that some or all of the functions on our website will not be available to you.

Sometimes our websites contain links to other websites. When you access a website other than our websites, we are not responsible for the privacy practices of that site. We recommend that you review the privacy policies of each website you visit.

Using your personal information

The personal information that we collect is generally used to provide products or services to you, and, if you use our website, to track your usage, to evaluate performance of our website, and to keep track of your account settings. Information collected by us may also be used for the following purposes:

- to provide you with information in relation to the products and services we provide;
- to send email notifications for special promotions or offers conducted by us;
- to conduct marketing activities and to conduct market research;

- to respond to your questions or suggestions;
- to improve the quality of our products or services; or
- to improve the quality of your visit to our Website.

You may opt out of receiving marketing information by notifying us accordingly, or by using any unsubscribe facility we provide for that purpose.

Sharing your personal information

We may disclose your personal information to other related entities within our corporate group for our own business purposes. Some of our related entities are located overseas, including in Singapore, China, Indonesia, Myanmar, Malaysia, Vietnam, Philippines, New Zealand and Thailand.

We may disclose information to third party contractors, who help us conduct our business. Where information is shared with these third parties, we will take all reasonable steps to ensure that third parties observe the confidential nature of such information and are prohibited from using any or all of this information beyond what is necessary to assist us.

We may disclose your personal information to a third party referred to above that is located outside Australia; however, due to circumstances which change from time to time it is not practicable for us to specify the countries in which such third parties are located.

While we may market the goods or services of third parties in limited circumstances as described above, we will always do so ourselves (or using our own third party contractors). We do not sell, rent or trade personal information to third parties for marketing purposes.

We may also disclose your personal information as permitted or required by law.

Accessing and correcting your personal information

We will, on request, provide you with access to the information we hold about you, including for the purpose of correcting or updating that information, unless there is an exception to such disclosure which applies under relevant privacy legislation. If you require access to your personal information, please contact our Privacy Officer as described in section 0 below. You may be required to put your request in writing for security reasons.

For most requests, your information will be provided free of charge, however, we may charge a reasonable fee if your request requires a substantial effort on our part.

If we refuse to provide you with access to the information, we will provide you with reasons for the refusal and inform you of any exceptions relied upon under the APPs (unless it would be unreasonable to do so). For instance, there may be some circumstances where providing certain personal information may be a breach of another party's privacy such as information provided during an investigation about yourself.

We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date whenever we collect or use it. If the personal information we hold about you is inaccurate, incomplete, irrelevant or out-of-date and if you have been given access to update this information yourself, such as an employee self-service of a payroll platform, we may expect these changes to be updated by you as soon as there is a change. If you don't have access to update your personal information please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

Protecting your Personal Information

We are committed to protecting your personal information. While no security measure can guarantee against compromise, we use a variety of security technologies and procedures to help protect your personal information from misuse, interference and loss, and from unauthorised access, modification, or disclosure.

This includes the use of technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect the privacy of your personal information.

Change of Policy

We may modify or amend this Privacy Policy from time to time. We will display a notice on our website <https://www.monson.com.au> for a reasonable period after any such revisions have been made. We will keep the current version of this Privacy Policy on that website.

Contact Information

If you have any queries or complaints with regards to our collection, use or management of your personal information, please contact our Privacy Officer:

A: Privacy Officer
Business Manager – Monique Costantino
E: hr@monson.com.au
T: +618 9335 0000

If you make a complaint, we will endeavour to respond to it as soon as possible. If you are dissatisfied with our response, you have the right to make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at enquiries@oaic.gov.au.

