

Personnel Privacy Policy

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Reference Information

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This policy is for internal use only.

1. Personnel Privacy Policy

Fagg's Group Pty Ltd ABN 13 130 782 802, its related bodies corporate and its business pillars (collectively, "Fagg's Group", "we", "our" or "us") is committed to the protection of personal privacy. This Personnel Privacy Policy only applies in respect of Fagg's Group's treatment of personal information that, in the course of conducting business and operations, Fagg's Group may collect, use and disclose about its "Personnel", which includes directors, employees, contractors, consultants (and any workers they engaged to perform work for Fagg's Group) and agency workers.

Fagg's Group may amend, revise or update this Personnel Privacy Policy from time to time in its sole discretion.

The most current version will be located via your manager or Intranet. In the event that any inconsistency arises between this Personnel Privacy Policy and the Privacy Act or other applicable law as amended from time to time, the Privacy Act or applicable laws will prevail.

Where we refer to the "Privacy Act" in this Policy we mean, if you are located in Australia, the Privacy Act 1988 (Cth).

This Policy is not intended to create any rights under the Privacy Act in respect of any Personnel information which would otherwise not be covered by the Privacy Act.

2. Personnel Directive and Personal Information

All Fagg's Group Employees are directed to and must handle personal information in accordance with this Personnel Privacy Policy in respect of other Personnel, the General Privacy Policy in respect of other individuals, as well as the requirements of all relevant privacy laws as amended from time to time, including the Privacy Act, any applicable State / Territory legislation and any other related policies of Fagg's Group as amended from time to time. Fagg's Group will view any breach of this Personnel Privacy Policy as a very serious matter. Any Person who breaches this Personnel Privacy Policy may be subjected to disciplinary action which may, if appropriate, include termination of employment or engagement.

All Personnel have received a copy of this Personnel Privacy Policy and, by acknowledging receipt of a copy of this Personnel Privacy Policy:

- confirm that they have read and understood their obligations under this Personnel Privacy Policy as
- an employee / contractor of Fagg's Group; acknowledge that, in the course of their employment or engagement with Fagg's Group, they may obtain or have access to personal information of third parties that is collected,
- used, stored or disclosed by Fagg's Group in the course of business and pursuant to this Personnel Privacy Policy; acknowledge and agree that they will handle, use, store and collect
- any personal information in accordance with this Personnel Privacy Policy, the General Privacy Policy, and any applicable law; acknowledge that, in relation to their own employment or engagement, during the course of that employment or engagement their employer and/or other Fagg's Group/Metcash entities will obtain personal information (including health,
- medical and other sensitive information) about them; and
confirm their consent to Fagg's Group obtaining and disclosing this personal information to other parties for the purposes of conducting Fagg's Group business and as outlined in this Personnel Privacy Policy.

3. Types of personal information collected by Fagg's Group

The types of personal information collected and held by Fagg's Group will vary depending on the nature of your employment / engagement with us. This information may include any or all of the following:

- name, address(es), telephone number(s) and other contact details;
- associated company name(s), current and previous position, occupation and other business details;
- electronic address(es);
- photographs or digital images;
- bank account details;
- credit card details (where relevant);
- tax file number (TFN) / Australian Business Number (ABN);
- transaction details relating to your use of our products, services or benefits;
- date of birth;
- CVs, references, application forms, details of education, job history and experience (both within Fagg's Group and with previous employers), areas of expertise, qualifications, contracts of employment or engagement and offer letters;
- details of compensation and benefits (including details of company loans, salary, pension / superannuation contributions), and records relating to working time, holiday and other leave;
- trade union / professional association membership;
- details of criminal convictions, where you disclose such information to us or consent to us performing a criminal record check on you;
- other information derived from background checks, including previous address details;
- emergency contact details;
- health information (such as medical records, sickness absence records and medical certificates); and
- other details relevant to your employment or engagement.

From time to time, you may provide us, and we may collect from you, personal information of a third party. Where you provide the personal information of a third party, it is your responsibility to ensure that those persons are aware of this Privacy Policy or the General Privacy Policy (as applicable), understand it and agree to accept it.

4. How Fagg's Group collects personal information

Generally, Fagg's Group collects personal information directly from you, such as:

- when you apply for a position;
- in the course of your employment or engagement with Fagg's Group;
- through the use of (legally permitted) surveillance activities such as the use of CCTV security cameras or internet and email monitoring; or
- when you have other dealings with us.

5. Why Fagg's Group collects, uses and discloses personal information

Fagg's Group will use the personal information it collects for the purpose disclosed at the time of collection, or otherwise as set out in this Privacy Policy.

Fagg's Group collects, stores, uses and discloses personal information of Personnel for a variety of purposes,

- to administer Fagg's Group's payroll system and Personnel benefits (such as bonuses, pensions, leave entitlements);
- to facilitate the management of work and Personnel;
- to address health and safety matters;
- to carry out appraisals, performance reviews and salary reviews, disciplinary investigations

and meetings;

- to operate and check compliance with our employment / workplace rules and policies;
- to operate our IT and communications systems such as the use of phones and IT infrastructure;
- as authorised or required by law, including record keeping requirements and obligations under workplace relations legislation;
- to establish and maintain your relationship with us; and
- to provide the products or services you have requested from us and keep a record of them; and
- to answer any inquiry you make.

Fagg's Group may also disclose your personal information to third parties who work with us in our business to provide, promote or improve products or services, such as consultants and professional advisers.

As an employer, Fagg's Group is required to collect certain information under various workplace relations, tax, superannuation and other legislation.

If you do not provide us with any information we request, Fagg's Group may not be able to perform necessary functions as an employer.

Fagg's Group may also use and disclose your personal

- audit and other purposes associated with assessing, monitoring, testing, identifying issues in relation to, and ensuring compliance with, Fagg's Group codes of conduct, policies, procedures, data integrity, payroll and reporting practices and information;
- internal audits into the functioning and running of internal departments to identify fraud, mismanagement, misconduct or any unlawful behaviour; and
- the production and delivery of reports in relation to the above.

6. How Fagg's Group stores and protects personal information

Fagg's Group stores personal information in a combination of computer storage facilities, paper-based files and other records. In so doing, we have taken reasonable steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure.

Additionally, Fagg's Group takes reasonable steps to destroy or permanently de-identify personal information when we no longer need it.

The internet is not a secure method of transmitting information. Accordingly, other than where Fagg's Group uses secure socket layer technology (SSL) to ensure information (such as credit card information) is securely transmitted and processed, Fagg's Group cannot and does not accept responsibility for the security of information you send to or receive from us over the internet, or for any unauthorised access or use of that information.

7. Disclosure of personal information of Personnel

We may from time to time disclose personal information of Personnel to our related bodies corporate for the purposes set out in this Personnel Privacy Policy. We may also sometimes need to make personal information of Personnel available to:

- other Fagg's Group and/or Metcash Personnel;
- professional advisers such as accountants, solicitors, business advisers and consultants;
- government bodies and regulatory authorities;

- persons who do business with us (such as IT systems suppliers, pension scheme, superannuation or medical benefit providers, insurers or underwriters, or outsourcing providers); and
- companies that we plan to merge with or be acquired by or who may invest in us.

Fagg's Group does not disclose your personal information to organisations in other countries, except: to Visa agencies in various countries when hiring Personnel from overseas, or assisting with securing visas for Personnel to travel overseas.

8. How you can request to access or correct your personal information

Fagg's Group will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date. If your personal details change, such as your address or phone number, please advise your manager.

At your request, Fagg's Group will provide you with a copy of any personal information which we hold about you, unless an exception under the Privacy Act or other applicable legislation applies which means we are not required or permitted to provide you with that information. We may charge a fee for retrieving this information, in which case we will inform you of the fee and obtain your agreement to that fee before providing the information.

We will promptly acknowledge and investigate any complaint about the way we manage personal information.

9. Digital Technologies

We and third parties may use digital technologies such as cookies, server logs, cloud service logs and web beacons in connection with Fagg's Group's website and other online services. Some of these technologies may operate without collecting or using any personal information. Please note this Personnel Privacy Policy applies to our collection, use, disclosure and storage of personal information

The Fagg's Group websites use cookies to track user traffic patterns and to better serve you when you revisit a website. A cookie is a small data file that a website may write to your hard drive when you visit it. A cookie file can contain information, such as a user ID which the website uses to track the pages you have visited. We allow cookies and other digital technologies to be used:

- so that your preferences for a particular site can be stored;
- to secure our users and our IT infrastructure;
- to improve your browsing experience; and
- to help tailor services to you.

Information is also generated whenever a page is accessed on a Fagg's Group website that records information such as the time, date and specific page. We collect such information for statistical and maintenance purposes that enables us to continually evaluate our website performance.

In some cases, third parties may use cookies and other technologies in connection with the Fagg's Group's website, for example in relation to online behavioural advertising, surveys and website analytics and email campaign tracking. The third-party technologies we may use from time to time include Google Analytics, Google AdSense, Google Tag Manager, Facebook tracking, Cretio, Hot Jar, Clicky and Gigya. You can find more details about these technologies, the data they collect and how you can opt out of certain conduct in the privacy policies and other consumer-facing documentation for those technologies (e.g., via Google's Ads Preferences Manager). You may need to opt-out separately from each technology. The website www.youronlinechoices.com.au also allows you

to opt-out of some online behavioural advertising and provides further information about how online behavioural advertising works. Your browser may also allow you to turn off or disable cookies and certain other technologies. Please be aware, however, that if you turn off or disable these technologies, you may not be able to experience the full functionality of our website and associated services.

10. How to contact Fagg's Group or make a complaint

If you wish to update personal information we hold about you, please speak with your Manager.

If you have any questions about this Personnel Privacy Policy, or if you wish to make a complaint about our collection, use or disclosure of your personal information under this Privacy Policy, please contact your Manager.

Fagg's Group will take reasonable steps to remedy any issues resulting from our failure to comply with our privacy obligations. If our response to your complaint does not address your concerns to your satisfaction, you may have the right to make a complaint to a competent regulator (e.g., in Australia, the Office of the Australian Information Commissioner, whose website is located at www.oaic.gov.au).