

# Privacy Policy

## 1. Purpose

The purpose of this policy is to explain how CleanCo may collect and use personal information in connection with the operation of our business.

CleanCo is committed to protecting any personal information that may be collected by us. This includes personal information disclosed to us when individuals browse or use our website.

This Privacy Policy sets out how we comply with our obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**) and under the *Australian Privacy Principles* (**APPs**).

## 2. Application

This Policy applies to all CleanCo employees, representatives and service providers.

Failure to comply with this policy may result in corrective or disciplinary action, in accordance with CleanCo's disciplinary procedures.

## 3. Collection of personal information

### 3.1 What personal information we collect

We only collect personal information that is necessary for one or more of our functions or activities.

The personal information we collect about you may include (but may not be limited to) your name, email address, location, contact details and information relating to your dealings with CleanCo and our clients.

Some functions or activities may require the collection of additional personal information and, in some cases, sensitive information. One example of this is recruitment and employment-related activities. This information may include:

- your date and place of birth;
- your reference and background check information (including verification of your identity, your eligibility to work in Australia and if required, your visa and/or passport details and police checks and financial crime related checks);
- a description of your gender;
- whether you are of Aboriginal or Torres Strait Islander origin;
- whether you have a language other than English as your first language;
- whether you have a disability; and/or
- your occupation (including your education and/or work history and professional memberships or qualifications).

The provision of sensitive information is voluntary. CleanCo will only collect sensitive information where it is reasonably necessary for its functions or activities and where the individual has provided consent, in accordance with applicable privacy laws.

In addition, CleanCo may collect other information about you when you interact with our website, such as your Internet Protocol (IP) address, browsing pattern on the CleanCo website, click stream data, HTTP protocol elements, and the status of cookies placed on your computer by CleanCo.

This Privacy Policy only relates to your personal information and does not relate to any aggregated, de-identified or other information that may be developed or created internally by us, provided that no individual is identified or reasonably identifiable from that information.

### 3.2 How we collect personal information

We usually collect personal information directly from an individual unless it is unreasonable or impracticable to do so. We may collect personal information directly from you when you:

- complete a form (including submitting a query via the 'contact us' page on our website)
- use our website
- engage with us via a third party website (e.g. Seek)
- contact us (including in writing, by email or via telephone)

In some circumstances we may collect your information from third parties. For example, where you apply for a role with us, we may collect personal information from recruitment consultants, your current or previous employers, universities, program providers and others who may be able to assist us in our decision as to whether to offer you employment.

### 3.3 Recording of telephone conversations

When applicable, telephone conversations with CleanCo's trading and financial risk and settlements teams may be recorded to evidence transactions with energy counterparties. Our energy counterparties have consented to the recording of telephone conversations. We confirm that we will only use the information recorded in these telephone conversations for the purposes of evidentiary transactions with energy counterparties and will not disclose the information in the telephone recordings to anyone else, except where required or authorised by law or where consent to such further disclosure has been obtained from the counterparty.

### 3.4 Closed Circuit Television (CCTV) and image collection

CleanCo uses closed circuit television (CCTV) and other image recording systems at certain CleanCo premises and sites. CleanCo CCTV systems may capture video images of employees, contractors, visitors and members of the public when they attend CleanCo premises or sites.

CCTV footage is collected to support the safety and security of people, property and operations, and to assist with the investigation of incidents, where permitted by law.

CCTV footage is stored securely and access is restricted to authorised personnel. CCTV footage and images may be disclosed to law enforcement agencies or other authorised parties where required or permitted by law.

### 3.5 Website data and cookies

Cookies are small packets of information that are stored by your web browser. They are put on your web browser by the websites that you visit. This information will not ordinarily be personal information, because you will not be identified, or reasonably identifiable from it, but they do allow us to know if you visit the same website twice or if you visit related websites.

With respect to cookies on your browser, we do the following:

- We only use cookies where they are necessary for our services or where you have provided your express or implied consent.
- We respect your wishes, and you can inspect, delete, or block any cookies used by us by selecting the appropriate control in your web browser.
- We support technologies that have been developed and are being developed for your web browser that allow you to be more selective about the cookies that your web browser will accept.

### 3.6 Providing information and anonymity

Generally, you have no obligation to provide any information requested by us. If you choose to deal with CleanCo anonymously or withhold the requested information, we may not be able to provide you with the services that depend on the collection of that information. If you are seeking employment with CleanCo, we may not be able to process your application.

## 4. Use and disclosure of personal information

### 4.1 Use of personal information

The purposes for which we may collect, use or disclose your personal information include to:

- effectively conduct our business and perform our operations, including managing our contractors;
- maintain our relationship with you, including providing information and services;
- maintain our records and reports, including the fulfilment of any legal requirements;
- assess an applicant's suitability for employment with us;
- ensure safety and compliance with CleanCo's reporting systems, including complying with all legislative and regulatory requirements;
- analyse CleanCo's services and business needs with a view to developing new or improved services and business practices;
- respond to an enquiry or request for information; and/or
- resolve complaints.

### 4.2 Disclosure of personal information

We may disclose personal information about you in connection with these purposes to:

- our employees, agents and external advisers (such as lawyers, auditors, accountants and financiers); or
- our service providers, contractors or organisations who provide service to us in connection with our business, such as mailing operations, billing and debt recovery functions.

We will not sell, rent or trade your personal information.

Where we disclose your information on the basis noted above, we will take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of individuals' personal information.

We may from time to time disclose your personal information to third party suppliers and service providers located overseas (including providers for the operation of our websites and/or our business). The countries to which we usually disclose personal information to, include: the United States, Europe and Singapore. Before we disclose any personal information overseas (including through software and cloud-based solutions), we will take steps as are reasonable to ensure that the overseas recipient does not breach the APPs.

## 5. Storage and protection of personal information

We generally host and store our data (including personal information) electronically in our IT systems. We may also store personal information in hard copy paper files. We take reasonable steps to protect the personal information that we hold from misuse, loss, unauthorised access, modification or disclosure. We have physical and electronic security systems, and we limit who can access your personal information.

If we become aware of an eligible data breach involving personal information, we will take steps to assess the breach, and where required, notify affected individuals and relevant regulators in accordance with applicable privacy laws, including the Notifiable Data Breaches scheme under the *Privacy Act*. Where appropriate, information about data breaches may be able to be made available through public notification.

## 6. Access to and correction of personal information

Under the *Privacy Act* you have a right to access, or request that we correct, the personal information that we hold about you.

It is our goal to ensure that the personal information that we hold is accurate, complete, relevant, not misleading, timely and secure. In order for us to meet this goal, you should ensure that you promptly advise us:

- if there is any change to any of the details you have provided to us; or
- if it comes to your attention that we possess certain information about you that is not correct, accurate, complete, up-to-date or relevant, so that we can continue to provide the services that we have agreed.

You can contact us on the details below to obtain further information on how to:

- request access to the personal information that we hold about you; or
- request that we correct the personal information that we hold about you where the individual considers that the information that we hold is not accurate, complete or up to date.

We will use all reasonable efforts to correct the information that we hold about an individual unless we consider that the *Privacy Act* or another relevant law permits or requires us to withhold the information or not make the correction.

If an individual requests us to provide them with access to personal information that we hold about them, we will provide such information within a reasonable time. We may require proof of the individual's identity before permitting access to or changing their personal records.

There is no charge levied by CleanCo for requesting access to, or correction of, personal information. If we cannot provide an individual with access to their personal information, or cannot correct it if requested, we will provide a written notice of our reasons for refusal.

Additionally, under the *Right to Information Act 2009 (Qld)*, individuals may also have a right to be given access to, and apply for amendment of, any documents received or brought into existence by CleanCo to the extent the document contains the individual's personal information. This only applies to the functions of CleanCo or any subsidiary companies of CleanCo insofar as those functions relate to CleanCo's 'community service obligations' (as defined under the *Government Owned Corporations Act 1993 (Qld)*).

## 7. Privacy complaints

An individual can make a privacy related complaint by contacting us on the details below. We will usually respond within 30 days unless it is unreasonable in the circumstances for us to do so. Individuals may also lodge a complaint with the Office of the Australian Privacy Commissioner.

## 8. Changes to this Privacy Policy

We reserve the right to make changes to this Privacy Policy. Any changes to our policy will be displayed on our website.

## 9. How to contact us about this Privacy Policy

If you would like to contact us in relation to anything concerning this Privacy Policy, or if you think that we have breached any aspect of this Privacy Policy, then please contact us at [privacy@cleancoqld.com.au](mailto:privacy@cleancoqld.com.au). You can also write to us at:

The Privacy Officer  
CleanCo Queensland Limited  
Level 17  
300 George Street  
BRISBANE QLD 4000

## 10. Implementation

This policy is implemented through our:

- Privacy Procedure

## 11. Exceptions

Exceptions are not permitted under any circumstances.

## 12. Guiding documents

This Policy should be read in the context of the following:

- *Privacy Act 1988* (Cth)
- *Australian Privacy Principles* (APPs)
- *Right to Information Act 2009* (Qld)
- *Government Owned Corporations Act 1993* (Qld)

## 13. Definitions

| Term                        | Definition  |
|-----------------------------|---|
| <b>Personal Information</b> | As defined by section 6 of the <i>Privacy Act</i> : 'information or an opinion (about an individual, or an individual who is reasonably identifiable), whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not'. |

## 14. Document details

|                      |                                      |
|----------------------|--------------------------------------|
| <b>Title</b>         | Privacy Policy                       |
| <b>Version</b>       | 5                                    |
| <b>Document #</b>    | n/a                                  |
| <b>Approver</b>      | Chief Executive Officer              |
| <b>Owner</b>         | Privacy Officer                      |
| <b>Approval date</b> | 22 March 2026                        |
| <b>Review period</b> | Biennial - unless otherwise required |

## 15. Revision history

| Version | Date       | Description  | Approved By |
|---------|------------|--|-------------|
| 1       | May 2019   | Initial document   | Board       |
| 2       | Oct 2020   | Review and consolidation of CleanCo's Governance Document Hierarchy                            | Board       |
| 3       | Dec 2021   | Annual review and update of address  | Board       |
| 4       | Dec 2023   | Periodic review and update of approval delegation to CEO                                       | CEO         |
| 5       | March 2026 | Periodic Review and transition to new policy template under the Governance Documents Framework | CEO         |

**Document #:** n/a  
**Version:** 5

**Privacy Policy**  
Governance Document  
Operational Policy

**clean**   
queensland