PRIVACY POLICY

Document Control

Item	Detail
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Version	2.0 (replaces the previous Privacy Policy)
Policy owner	HR Manager
Approved by	Jason Nicholas, CEO
Approval date	10.11.26
Next review date	10.11.27

Revision History

Version	Date	Summary of changes	Approved by
1.0	2021	Original Privacy Policy	Fran Coyle, Managing Director
2.0	10. November 2026	Updated to current Privacy Act requirements. Added what information is collected and why, CCTV and visitor sign-in, overseas and cloud disclosure, AI tools, data breach notification, and Privacy Officer contact details	Jason Nicholas, CEO

1. ABOUT THIS POLICY

This policy is adopted by Norwood Industries Pty Ltd (ABN 90 004 817 207) (Norwood, we, us). We respect your privacy and aim to manage personal information openly and transparently, in line with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. Because we also do business in New Zealand, we comply with the Privacy Act 2020 (NZ) and its Information Privacy Principles for personal information about our New Zealand customers, contractor and other contacts.
This policy explains what personal information we collect, why we collect it, how we use, share and protect it, and how you can access or correct it or make a complaint.

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether it is true or not and whether it is recorded or not.
Employee records. Under the Privacy Act, records directly related to the employment of our current and former employees are generally exempt. We still handle them carefully and confidentially, but this policy mainly applies to customers, suppliers, job applicants, contractors, website visitors and other people we deal with.

2. WHAT PERSONAL INFORMATION WE COLLECT

We only collect personal information that is reasonably necessary for our business. The type of information depends on how you deal with us.

Who	Information we may collect
Customers and their staff	Name, job title, business contact details, delivery addresses, order and quote history, payment and account details, and communications with us
Suppliers and contractors	Name, business contact details, ABN, bank details for payment, insurance and licence details, and site induction and safety records
Job applicants	Name, contact details, resume, work history, qualifications, referee comments, right-to-work information, and interview notes
Website visitors	Information you submit through forms, and technical information such as IP address, browser type and pages visited, collected through cookies and analytics tools
Visitors and anyone on our premises	Name, organisation, time of visit and sign-in records, and CCTV footage

- CCTV. We operate CCTV cameras outdoors and indoors at our office and factory sites, for safety and security and to protect people and property. Signs are displayed to let people know cameras are in use. Cameras are never placed in toilets, change rooms, shower areas or parent rooms. Footage is stored securely, accessed only by authorised staff, and kept for 20 days onn average unless it is needed to investigate an incident. We may share footage with police, insurers or legal advisers where needed.
- Sensitive information, such as health information or criminal record checks, is only collected where it is reasonably necessary and you have consented, or where the law allows it. For example, we may collect health information relevant to safety on site, or carry out checks for certain roles.
- Dealing with us anonymously. You can deal with us anonymously or under a pseudonym where that is practical, such as for a general enquiry. For most orders, deliveries and accounts, we need your name and contact details.

3. HOW WE COLLECT PERSONAL INFORMATION

We collect personal information lawfully and fairly. Usually we collect it directly from you, for example:

- by phone, email, in person or through our website
- when you place an order, request a quote or open an account

- when you apply for a job, register as a supplier or sign in at our sites

Sometimes we collect it from others, such as your employer, our customers or suppliers, recruitment agencies, referees, credit reporting bodies or public sources. Where we do, we take reasonable steps to make sure you know about it.
When we collect personal information, we take reasonable steps to let you know who we are, why we are collecting it, who we usually share it with, and where to find this policy, either at the time or as soon as practical afterwards.
If we receive personal information we didn't ask for and don't need, we will destroy or de-identify it where lawful and reasonable.

4. HOW WE USE AND DISCLOSE PERSONAL INFORMATION

We use personal information for the purpose we collected it, including to:

- provide quotes, process orders, produce and deliver products, and manage customer accounts
- engage and pay suppliers and contractors
- assess job applications
- manage site safety and security, including through visitor sign-in and CCTV
- communicate with you, respond to enquiries and resolve complaints
- improve our products, services and website
- meet our legal, tax, audit and insurance obligations

We may also use or disclose it for a related purpose you would reasonably expect, with your consent, or where the law requires or allows it.

Who we share it with:
We may share personal information with service providers who help us run our business, such as freight and courier companies, IT and cloud providers, payment processors, debt collectors, recruitment agencies, auditors, insurers and professional advisers. We require them to protect it and use it only for the services they provide to us. We may also share it with government authorities where the law requires.

We do not sell personal information.

Direct marketing:
We may send you information about our products and services if you have agreed to it, or if you would reasonably expect it as an existing customer. Every marketing email includes a way to unsubscribe, and you can also ask us at any time to stop.

5. OVERSEAS DISCLOSURE, CLOUD SERVICES AND AI TOOLS

Some of our service providers, including cloud software, email and data storage providers, may store or process personal information outside Australia, for example in the United States. Before disclosing personal information overseas, we take reasonable steps to make sure the recipient handles it in line with the Australian Privacy Principles.

We use approved artificial intelligence tools, such as Microsoft Copilot within our protected Microsoft environment, to support everyday work. Our staff are not permitted to enter customer or personal information into public or personal AI tools.

We do not currently use computer programs to make decisions that significantly affect individuals' rights or interests without human involvement. If this changes, we will update this policy to explain how.

6. HOW WE STORE, PROTECT AND DISPOSE OF PERSONAL INFORMATION

We hold personal information in paper and electronic records, including on our servers and in cloud-based systems. We take reasonable steps to protect it from misuse, interference, loss and unauthorised access, change or disclosure, including:

- password-protected systems, multi-factor authentication where available, and access limited to staff who need it
- secure remote access through our approved VPN
- locked storage for paper records
- staff training, our Internet, Email and Computer Use Policy (NOR-IT-001) and our Artificial Intelligence Use Policy (NOR-IT-002)

We keep personal information only as long as we need it for our business or as the law requires, such as for tax records. After that, we securely destroy or de-identify it.

7. DATA BREACHES

If we suspect a data breach, we will act quickly to contain it and assess the risk. If a breach is likely to cause serious harm to anyone, we will notify the people affected and the Office of the Australian Information Commissioner (OAIC), as required by the Notifiable Data Breaches scheme. If a breach affects people in New Zealand and is likely to cause serious harm, we will also notify them and the New Zealand Privacy Commissioner.

8. ACCESSING AND CORRECTING YOUR INFORMATION

Access. You can ask for access to the personal information we hold about you by contacting our Privacy Officer (section 10). We will respond within 30 days, and give you access in the way

you ask for where it is reasonable to do so. We won't charge you for making a request, but may charge a reasonable fee for providing access in some cases, and will tell you beforehand.

Correction. If you think information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to correct it, free of charge. We will also correct information ourselves if we become aware it is wrong.

If we refuse. In limited cases the law allows us to refuse access or correction. If so, we will explain why in writing and tell you how to complain. If we refuse a correction, you can ask us to attach a statement to your information noting that you believe it is incorrect.

9. COMPLAINTS

If you have a concern about how we have handled your personal information, please contact our Privacy Officer in writing (section 10). We will acknowledge your complaint promptly, look into it, and respond within 30 days.
If you are not satisfied with our response, you can complain to the Office of the Australian Information Commissioner at oaic.gov.au or on 1300 363 992. If you are in New Zealand, you can complain to the Office of the Privacy Commissioner at privacy.org.nz.

10. CONTACT US AND CHANGES TO THIS POLICY

Privacy Officer	
Contact	HR Manager, Norwood Industries Pty Ltd
Email	Hr@norwood.com.au
Phone	+61 387 969 300

We may update this policy from time to time. The current version is always available on our website, and we will provide a copy in another form on request.