

Company Policy		
Title:	Privacy Policy	Revision
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1. Our Privacy Policy

Your privacy is important to us. This statement outlines Knorr-Bremse Australia's (KBA) policy on how we collect and handle personal information, including how we maintain, use, store and disclose the personal information we hold, and reflects our commitment to you. It applies to all operations within the Knorr-Bremse Australia Group.

It is KBA's policy to respect the confidentiality of information and the privacy of individuals. KBA is bound by the Australian Privacy Principles (APP) contained in the Privacy Act 1988.

The KBA Privacy Policy will be reviewed and updated from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Updates will be published on our website and to KBA employees through its "all employee" email communications. Please regularly check our Privacy Policy so that you are aware of these updates and changes. Any information we hold will be governed by the most current version of the KBA Privacy Policy.

We are committed to being open and transparent about how we manage personal information.

2. Overview of The Personal Information We Collect and Hold

We collect, use, hold and disclose personal information to carry out one or more of our business functions or activities, including to perform agreements with you as our customers, suppliers, vendors, partners, employees and/or recruitment candidates (as the case may be).

Personal information includes information regarding your contact details, information you provide when you create a user account, and information obtained or received by us in connection with your business relationship, with your employment and/or your application for a position with us (as the case may be).

We also collect, use, hold and disclose sensitive information with your consent or if one of the following conditions applies:

- collecting sensitive information is required or authorised by or under an Australian law or a court/tribunal order; or
- collecting sensitive information where a 'permitted general situation' or a 'permitted health situation' exists.

3. How We Collect Personal Information

We aim to only collect the personal information we require to carry out one or more of our functions or activities in any given instance.

The main way we collect personal information about you is when you provide it. For example, we collect personal information, when:

- you create a user account;
- you contact us via online contact forms, emails or phone;
- you provide your resume, work experience, qualifications when applying to become our business partner and/or for employment with us; and
- you complete your business partner and/or employment paperwork for the purposes of commencing business and/or employment with KBA (as the case may be) such as bank details and tax file number.

We may collect personal information about you indirectly from third parties and/or publicly available sources such as when:

- we receive any references from previous employers;
- we receive the results of any medical tests, competency tests, integrity database, credit agencies and/or criminal record checks;
- we receive any information in relation to a workplace accident in which you may be involved; and
- we receive any information from compliance screenings (if and when these are legally required) from trade register excerpts, press coverage, financial information and information about relevant and significant litigation or other legal proceedings against you.

4. How We Use or Disclosure Personal Information

We usually use your personal information for the purpose for which it was collected (“primary purpose”). Some examples of where we use your personal information for the purpose of performing one or more of our business functions or activities are as follows:

- communicating with you about products, services and projects;
- planning, performing and managing our (contractual) relationship with you;
- administrating and performing customer surveys, marketing campaigns, market analysis, sweepstakes, contests, or other customer activities or events;
- recruitment and staffing;
- Human Resources and organisational administration, including payroll;
- implementation of training and further education;
- maintaining and protecting the security of our property, products, services and websites, preventing and detecting security threats, fraud or other criminal or malicious activities;
- ensuring compliance with statutory and other legal obligations (such as accounting, bookkeeping, auditing, and record keeping obligations), export control and customs, business partner compliance screening obligations (to prevent white-collar or money laundering crimes), and our policies or industry standards; and
- solving disputes, enforce our contractual agreements and to establish, exercise or defend legal claims.

Sometimes we may need to use your sensitive information. We will generally only use your sensitive information with your consent.

Your personal and sensitive information may be used in connection with:

- Any medical tests which you may be required to undergo
- Identifying any training needs
- Workplace rehabilitation
- Our management and resolution of any complaint, inquiry or investigation in which you are involved
- Any insurance claim or proposal that requires disclosure of your personal or sensitive information
- Undertaking criminal reference checks.

Disclosures

We may, in certain circumstances, use and/or disclose your personal and sensitive information (including to trusted third parties) for the purposes for which it is primarily held or for a different but related purpose to that for which it was collected (“secondary purpose”). These circumstances include:

- where you have provided the consent;

- where you would reasonable expect KBA to disclose the personal information for that secondary purpose, and the personal information is disclosed for a secondary purpose which is related to the primary purpose of collection (or, in the case of sensitive information, directly related to the primary purpose);
- where it is required or authorised by an Australia law or a court/tribunal order;
- where a 'permitted general situation' or a 'permitted health situation' exists; and
- where KBA reasonably believes that it is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.
- Your personal information and sensitive information may be disclosed to:
 - KBA's workers compensation provider and any associated rehabilitation providers
 - health care providers for the purposes of medical checks
 - background checking agencies for criminal record checks
 - our insurers
 - any person with a lawful entitlement to obtain the information
 - any governmental, regulatory, taxation, law enforcement, judicial or other equivalent bodies if and as requested by them.

We ensure that appropriate protections of personal information are in place with these third parties, consistent with our obligations under the Privacy Act. This includes ensuring as and when required the use and/or disclosure of de-identified (anonymised) data.

Disclosure to overseas recipients

We disclose personal information overseas to other affiliated companies within Knorr-Bremse Group, for the processing purposes as provided in the Privacy Notice for Business Partners. You can find the names, locations, and contact information of such affiliated companies via: <https://www.knorr-bremse.com/en/company/knorr-bremse-worldwide>.

Prior to the disclosure of personal information to a recipient outside Australia, KBA takes reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the personal information unless one of the exceptions referred to below apply. The reasonable steps include, but are not limited to, entering into an enforceable contractual arrangement with the overseas recipient that requires the recipient to handle the personal information in accordance with the Australian Privacy Principles.

KBA may not take reasonable steps if:

- KBA reasonably believes that a law or binding scheme substantially similar to the Australian Privacy Principles apply and there is an enforcement mechanism for individuals;
- the individual has provided the consent;
- it is required or authorised by an Australian law or a court/tribunal order;
- a 'permitted general situation' exists;
- it is required or authorised by or under an international agreement relating to information sharing to which Australia is a party; and
- KBA reasonably believes that it is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

5. How We Manage Personal Information

At KBA, we respect the confidentiality and the privacy of individuals. KBA treats breaches of your privacy very seriously and any breach may result in disciplinary action being taken, dependent upon its severity. KBA has appointed a Privacy

Officer to ensure that our management of personal information is in accordance with this policy and the relevant Privacy Acts.

6. How We Store and Protect Personal Information

Safeguarding the privacy of your information is important to us, whether it is disclosed to us personally, by phone, mail, over the internet or other electronic medium, or by third parties. We hold personal information in a combination of secure computer databases and paper-based files, and take such steps as are reasonable in the circumstances to protect the personal information we hold from misuse, interference and loss, unauthorised access, modification or disclosure. We are required to maintain records for a minimum of seven (7) years in accordance with The Fair Work Act 2009. When the information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

We take reasonable steps to protect the security of the personal information we hold from both internal and external threats through access security and monitoring controls, including:

- regularly assessing the risk of misuse, interference, loss and unauthorised access, modification or disclosure of that information;
- taking measures to address those risks, for example, by keeping a record (audit trail) of when someone has added, changed or deleted personal information held in our electronic databases and regularly checking that employees only access those records they are permitted to and when they need to;
- conducting regular internal and external audits to assess whether we have adequately complied with or implemented these measures;
- by implementing and regularly updating our data breach response plan to ensure that we meet our obligations under the notifiable data breach scheme under the Privacy Act; and
- by undertaking impact assessments when information handling practices change, or new practices are introduced.

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8. How We Keep Personal Information Accurate and Up To Date

To ensure that the personal information we hold and disclose is accurate, up to date, complete, relevant and not misleading, we, for example

- record information in a consistent format;
- where necessary, confirm the accuracy of information we collect from a third party or a public source;
- promptly add updated or new personal information to existing records; and
- audit our contact list to check their accuracy from time to time and where necessary.

We also review the quality of personal information before we use or disclose it.

We recognise that information changes frequently with changes of address and other personal circumstances. Please ensure you notify us when any of your details or circumstances has changed.

9. Enquiries & Complaints

You can make enquiries, request access or corrections to your personal information, lodge a complaint about how we have handled your personal information or about alleged breaches of the APPs to our Privacy Officer:

Paul O'Brien
Group Human Resources Manager
02 8863 6540
paul.o'brien@knorr-bremse.com

10. Access and Correction of Personal Information

Subject to some exceptions that are set out in the Australian Privacy Principles you can gain access and correct the personal information that we hold about you.

To make a request to access or correct your personal information, you will need to submit your request in writing to us verifying your identity and specifying what information you require. We will respond to your request within a reasonable period after the request is made and provide access or correct to the information in the manner requested, if it is reasonable and practicable to do so.

11. Complaints

If you wish to complain to us about how we handle your personal information or about alleged breaches of the Australian Privacy Principles, you should first complain to us in writing. If you need help lodging a complaint, you can contact our Privacy Officer for assistance.

We aim to acknowledge receipt of all complaints within five (5) working days and aim to resolve all complaints within thirty (30) working days. This may not be possible in all circumstances depending on the contents of the complaint. In this situation, we will respond to your complaint in a reasonable time. If you are not satisfied with our response to your complaint or the way in which the complaint was handled, you can contact the Office of the Australian Information Commissioner (OAIC) www.oaic.gov.au

12. Privacy Policy Update

We may update this privacy policy from time to time. Revised versions of our privacy policy will be posted here. We will notify you by other means (for example, by placing a notice on our website) if we make material changes to this policy. This privacy policy is effective as of 14 October 2024.

13. Document Update History

Revision	Date	Change details	Prepared By	Checked By	Approved By
1	01/07/2016	Newly created and release of KBA privacy policy	P. O'Brien	P. O'Brien	S. Emmas
2	22/10/2021	Updated to new layout	S. Collinson	P. O'Brien	P. O'Brien
3	14/10/2024	Update of content	APAC Legal	T. Zachan	P. O'Brien