



## Privacy Policy – Credit Information (Australia)

Brambles Limited

Instituted: 30 June 2022

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### Who does this policy apply to?

Brambles Limited (ABN 89 118 896 021) and its related companies (**Brambles, we** or **us**) is a public company listed on the Australian Securities Exchange. We are a supply-chain logistics company operating in more than 60 countries under the CHEP brand.

In relation to certain of Brambles' operations, we may at times be a "credit provider" within the meaning of the *Privacy Act 1988* (the **Privacy Act**) because of the structure of the terms and conditions of payment for the goods or services we provide. Brambles has adopted this Credit Information Privacy Policy to outline the commitment that Brambles has made to protect the personal and credit information about individuals that it receives.

This Credit Information Privacy Policy supplements the Brambles group Privacy Policy, which is available on our website: [www.brambles.com](http://www.brambles.com).

This Credit Information Privacy Policy has been adopted in accordance with Australian law requirements under the Privacy Act and the *Privacy (Credit Reporting) Code 2004* registered under the Privacy Act. We also have various other country-specific policies which deal with particular local law requirements in relation to credit information about individuals. To obtain a copy of any of these policies, please contact [privacy@brambles.com](mailto:privacy@brambles.com).

Brambles may amend this Credit Information Privacy Policy from time to time and at our discretion and without notice. The latest version will be available on our website: [www.brambles.com](http://www.brambles.com).

### What credit information and credit eligibility information do we collect?

If you apply for products, services or credit through us, we may collect and hold credit information and credit eligibility information about you if you are one of the following individuals in relation to one of our customers or prospective customers:

- Company: the directors and shareholders of that company;
- Partnership: the partners; or
- Sole trader: that sole trader, or provide a guarantee for one of our customers or prospective customers.

We primarily collect this information directly from you, for example through the application form that you have completed, telephone calls and written correspondence.

The information that we collect directly from you includes information we use to identify you such as your name, date of birth, occupation, driver's licence number and residential address as well as whether you rent or own that property. We may also collect all types of 'credit information, 'credit eligibility information' and 'CP derived information' (terms as defined in the Privacy Act). This includes personal credit information and credit eligibility information about you from third parties such as credit reporting bodies and publicly available information. Additionally, we may collect your credit application history, repayment history, default history, details of any previous business relationships, any court action (including bankruptcy proceedings) relating to any credit provided to or applied for by you and any information typically included in reports prepared by credit reporting bodies.

### How do we collect your credit information and credit eligibility information?

We will collect your credit-related information directly from you in most cases, for instance through telephone calls, through our application forms and processes or via email.

We may also collect it from persons acting on your behalf (for instance, dealers, brokers, or financial advisors) or from our related entities. We also collect credit-related information from credit reporting bodies or from other credit providers where permitted by the Privacy Act.

If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and why, unless such information:

- (a) is collected from publicly available sources, including but not limited to any court proceeding information, personal insolvency information and credit relate publicly available information; or
- (b) is collected as otherwise required or authorised by law.

### **How do we use and disclose this information?**

Brambles collects, holds, uses and discloses individuals' credit information and credit eligibility information primarily to assess whether to provide commercial credit to a prospective customer and in the ongoing management of customers' accounts. We will only use or disclose your credit-related information for the primary purposes for which it was collected or as consented to. Such primary purposes are outlined below:

- Brambles may disclose this information to other companies within the Brambles group or to third party service providers engaged by us to assist with processing applications from prospective customers and managing customers' accounts, which may mean that your credit information and credit eligibility information is transferred overseas to some of the countries in which Brambles has operations to entities that do not have an Australian link. These are principally India, Romania, the United Kingdom and/or the United States of America. Brambles has in place a data transfer intragroup agreement with Brambles group entities, as well as contracts with these third parties that require them to only use the information for the purpose Brambles has provided it to them as part of their engagement and to maintain confidentiality of all information. Please see our Privacy Policy for further details about how your personal information is handled by Brambles when it is disclosed to overseas recipients; and
- Brambles may also disclose your credit information and credit eligibility information to credit reporting bodies, primarily Dun & Bradstreet and Veda Advantage, for the purpose of ensuring that credit information held by those organisations is up-to-date and so that they can assess your credit worthiness.

However, there are some circumstances where we may also use or disclose your personal information and in doing so, we are not required to seek your additional consent:

- when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose;
- if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;
- if we have reason to suspect that unlawful activity has been, or is being, engaged in; or
- if it is required or authorised by law.

We only disclose an individual's credit information and credit eligibility information in accordance with the Privacy Act and the Credit Reporting Privacy Code.

### **How do we protect your credit information and credit eligibility information?**

Brambles has policies and processes in place to protect your credit information and credit eligibility information from misuse, interference, loss or unauthorized access, modification or disclosure. These include training programs which aim to ensure that relevant employees are aware of any privacy

obligations regarding personal information to which they may have access, secure electronic databases to which access is only granted to those employees who need it to fulfil their role, use of secure networks and passwords.

Brambles also takes reasonable steps to ensure that any third party service providers to whom Brambles discloses credit information or credit eligibility information have in place an appropriate privacy policy and procedures to meet the applicable Privacy Act requirements.

### **How to access your credit eligibility information that we hold and request corrections**

Should you wish to access your credit eligibility information that is held by Brambles, please contact [privacy@brambles.com](mailto:privacy@brambles.com). We will provide you with this information in timely manner unless we are lawfully unable to do so. If we refuse to give you access to your credit eligibility information, we will explain why in writing. We will not charge an application fee to access your credit eligibility information, but we may charge a reasonable fee for giving access, including photocopying fees.

While Brambles takes reasonable steps to ensure that any credit information or credit eligibility information we hold is accurate, up-to-date, complete, relevant and not misleading, you can request that we correct any errors relating to your credit information or credit eligibility information that we hold by contacting [privacy@brambles.com](mailto:privacy@brambles.com).

### **Contact for privacy issues and complaints**

If you have any queries regarding this Credit Information Privacy Policy or any complaints that Brambles has breached its obligations under Division 3 of Part IIIA of the Privacy Act or the Credit Reporting Privacy Code (if you are in Australia) or any of its other privacy obligations relating to credit information, please contact [privacy@brambles.com](mailto:privacy@brambles.com).

In order for us to investigate any complaint, you will need to provide us with sufficient details to properly identify you, as well as any supporting information. We will acknowledge your complaint in writing within 7 days, conduct an investigation and notify you in writing within a reasonable time (usually 30 days from the date on which the complaint was made) about the outcome of our investigation. If you are not happy with the outcome, you can access the external dispute resolution scheme which will be notified to you with the outcome or make a complaint to the Privacy Commissioner at the Office of the Australian Information Commissioner – [www.oaic.gov.au](http://www.oaic.gov.au).

### **Statement of Notifiable Matters under the Credit Reporting Privacy Code**

Under the Credit Reporting Privacy Code, there are several 'notifiable matters' that we are required to disclose to you at or before the time of collecting personal information that is likely to be disclosed to a credit reporting body.

- The credit reporting bodies to which Brambles is likely to disclose your personal information are Dun & Bradstreet and Veda Advantage. Their contact details can be found on their respective websites: [www.dnb.com.au](http://www.dnb.com.au) and [www.veda.com.au](http://www.veda.com.au).
- These credit reporting bodies may include the information Brambles provides to them in reports provided to other credit providers to assist them to assess your creditworthiness.
- You may obtain a copy of this Credit Information Privacy Policy, which is Brambles' policy about the management of credit-related personal information, from our website ([www.brambles.com](http://www.brambles.com)) or by contacting [privacy@brambles.com](mailto:privacy@brambles.com).
- You may obtain a copy of Dun & Bradstreet's and Veda Advantage's policies about the management of credit-related personal information from their respective websites: [www.dnb.com.au](http://www.dnb.com.au) and [www.veda.com.au](http://www.veda.com.au).

- You have the right to access your credit-related personal information that Brambles holds, request corrections and make a complaint as outlined above.
- You have the right to request credit reporting bodies not to use your credit reporting information for the purposes of pre-screening of direct marketing by a credit provider.
- You have the right to request credit reporting bodies not to use or disclose your credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud.
- You can request Brambles to provide you with a copy of this Credit Information Privacy Policy, including this Statement of Notifiable Matters and which is available on our website ([www.brambles.com](http://www.brambles.com)), in an alternative form such as a hard copy by contacting [privacy@brambles.com](mailto:privacy@brambles.com).