

Merton Environmental Pty Ltd — Privacy Policy

Effective date: 1 July 2025

This Privacy Policy (“**Policy**”) explains how Merton Environmental Pty Ltd (“**Merton**”, “**we**”, “**us**”, “**our**”) collects, holds, uses and discloses personal information and how individuals can access or correct that information or make a privacy complaint. This Policy is intended to comply with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs).

This Policy applies to any personal information Merton collects or holds about individuals, including clients, generators, transporters, receiving facilities, subcontractors, suppliers, contractors, employees, job applicants and visitors to our website.

1. Key definitions

- (a) **Personal information:** Information or an opinion about an identified individual, or an individual who is reasonably identifiable.
- (b) **PPSR:** The Personal Property Securities Register.
- (c) **Processing/handling:** Collecting, recording, storing, accessing, using, disclosing, erasing or otherwise dealing with personal information.
- (d) **Sensitive information:** Special categories of personal information (for example health information). Merton does not routinely collect sensitive health information; limited health information may be collected only where strictly necessary for lawful work health & safety or claims purposes.
- (e) **Subcontractor:** Any third party engaged by Merton to perform services or supply goods.

2. Types of personal information we collect

- (a) **Identity & contact:** Full name, job title, employer, postal address, site address, email address, telephone numbers.
- (b) **Service & operational:** Consignment note details, chain-of-custody records, site access logs, sample identifiers and associated laboratory results where linked to persons.
- (c) **Commercial & financial:** ABN/ACN, invoicing contacts, payment details, credit references, credit-check results and guarantees where required (see Terms & Conditions clauses 8, 9 and 20).
- (d) **Employment & contractor details:** Qualifications, licences, referees, tax and superannuation information for employees and contractors.

- (e) **Online & technical:** IP addresses, cookies, analytics and other website technical data.
- (f) **Sensitive information:** Not collected routinely. Where required (e.g. fitness-for-work, workers' compensation), Merton will only collect the minimum necessary and treat it as sensitive information under the Privacy Act.

3. How we collect personal information

- (a) **Directly from you:** When you contact us, accept a Quote, issue a Purchase Order, engage our Services, apply for a job, attend a site, sign consignment notes, or complete online/offline forms.
- (b) **From third parties:** From your employer, client, transporters, laboratories, receiving facilities, subcontractors, referees, public registers (for example ABR) and other service providers.
- (c) **Automatically:** Via website cookies/analytics and, where used, CCTV or electronic access systems on sites.
- (d) **Lawful and minimal collection:** We only collect personal information that is reasonably necessary for our business functions and services, and by lawful and fair means.

4. Purposes for collection, use and disclosure

We collect, hold, use and disclose personal information for the following purposes:

- (a) **Service delivery:** To provide environmental consulting, site investigations, sampling, testing, laboratory analysis, waste brokerage, project management, design/manufacture and associated services.
- (b) **Chain-of-custody & logistics:** To create and maintain consignment notes, arrange transport, testing and acceptance at receiving facilities, and to meet regulatory transfer requirements (see Terms & Conditions clause 13).
- (c) **Subcontracting & vendor management:** To engage and manage Subcontractors, laboratories and transporters.
- (d) **Billing & credit management:** To invoice, process payments, manage accounts, perform credit checks and register/enforce security interests on the PPSR when necessary.
- (e) **Health & safety & site access:** To administer site inductions, emergency contact lists, incident investigations and safety compliance.

- (f) **Legal & regulatory compliance:** To satisfy legal, regulatory and court requirements and to respond to lawful requests from government or regulators.
- (g) **Security, insurance & disputes:** To investigate incidents, manage insurance claims and defend or pursue legal rights.
- (h) **Marketing:** To provide information about our services where you have consented or where we have a lawful basis; you can opt out at any time.
- (i) **Improvements & analytics:** To maintain and improve our services, systems and website performance.

We will not use personal information for unrelated purposes without consent, unless permitted or required by law.

5. Disclosure and third parties

- (a) **Subcontractors, laboratories and transporters:** We disclose personal information to Subcontractors, NATA-accredited laboratories, transporters and receiving facilities as necessary for service delivery.
- (b) **Clients and project partners:** We share project-relevant personal information with clients and project stakeholders where necessary to deliver services (for example generator contact and consignment details required by receiving facilities).
- (c) **Professional advisers & insurers:** We may share personal information with auditors, accountants, insurers and legal advisers where reasonably necessary.
- (d) **Regulators & authorities:** We will disclose personal information to regulators, law enforcement or statutory bodies where required by law or to comply with lawful requests.
- (e) **PPSR & security interests:** For goods subject to retention of title or security, we may use personal information to register, perfect and enforce security interests on the PPSR.
- (f) **Anonymous and aggregated data:** We may disclose de-identified or aggregated information for reporting, research or analytics.

6. Overseas transfers and cloud processing

- (a) **Cloud services & overseas storage:** Merton may use cloud hosting, backup and software services which store or process personal information outside Australia. We take a risk-based approach and implement contractual and technical safeguards (for example encryption, access controls, provider due diligence and contractual data protection clauses) before any overseas transfer.

- (b) **Countries & disclosure:** Where we rely on specific overseas providers or jurisdictions in a material way we will list them on request. Transfers are undertaken only where the recipient provides comparable protections and where use is necessary to deliver the Services.

7. Security and data breach response

- (a) **Security measures:** We maintain physical, technical and organisational measures appropriate to the sensitivity of the information. Measures include access controls, role-based permissions, encryption where appropriate, secure backups, network and patch management, and staff training.
- (b) **Supplier obligations:** Where we disclose personal information to Subcontractors we will, where feasible, require contractual flow-down of confidentiality and security obligations.
- (c) **Breach response:** We have an incident response plan. If a data breach is likely to result in serious harm we will comply with the Notifiable Data Breaches scheme and notify affected individuals and the Office of the Australian Information Commissioner (**OAIC**) as required. We will also notify Clients promptly of any actual or suspected breach affecting Client personal data and cooperate in investigations.

8. Retention and destruction of personal information

- (a) **Retention principle:** We retain personal information only as long as necessary to fulfil the purpose for which it was collected, to meet contractual or legal obligations and to resolve disputes.
- (b) **Typical retention periods:** Project, consignment, chain-of-custody and laboratory records: minimum seven (7) years (see Terms & Conditions clause 26.1).
- (c) **Employment records:** retained in accordance with employment and tax law.
- (d) **Marketing consent records:** retained until consent is withdrawn.
- (e) **Secure destruction:** When personal information is no longer required it will be securely destroyed or de-identified.

9. Access, correction and complaints

- (a) **Access & correction:** Individuals can request access to personal information we hold or request correction by contacting our Privacy Officer. We will respond within a reasonable time and provide access or correct information where required by law. Reasonable verification may be required prior to disclosure.

- (b) **Complaints:** If you have a privacy complaint please contact our Privacy Officer. We will acknowledge receipt, investigate promptly and provide a response. If you are not satisfied with our handling of your complaint you may lodge a complaint with the OAIC. See: <https://www.oaic.gov.au/contact-us>.

10. CCTV and site monitoring

- (a) **Use and notice:** Where CCTV or electronic monitoring is used on Merton sites or sites where we operate, appropriate signage will be displayed. Footage will be used for safety, security, compliance and incident investigation consistent with applicable law and this Policy (see Terms & Conditions clauses 5 and 27).
- (b) **Access requests:** Requests to access footage will be handled in accordance with applicable legal requirements and this Policy.

11. Cookies and website tracking

Cookies & analytics: Our website uses cookies and analytics software to improve functionality, measure usage and for security. You can manage cookie preferences via your browser settings or any cookie banner we provide. Third-party analytics providers will be contractually required to protect personal information where applicable.

12. Children and minors

Under 18s: We do not normally collect personal information from children. If we need to collect personal information from a person under 18 we will obtain parental or guardian consent where required by law.

13. Changes to this policy

Updates: We may amend this Policy from time to time. The current version and effective date will be published on our website. Where changes are material, we will take reasonable steps to notify affected individuals.

14. Contact details & further information

Privacy Officer: Andrew Gowans

Email: ag@mertonenv.com.au

Phone: 0402 038 869

Postal address: 15 Abbott St, Alphington VIC 3078



If you require further information about how we handle personal information, or you wish to make an access/correction request or privacy complaint, contact the Privacy Officer.