

# PRIVACY POLICY

Orora Limited and its associated entities within Australia (Orora) are committed to protecting your privacy. It is bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) and all other applicable Australian legislation governing privacy. Where appropriate, Orora will handle personal information relying on the related bodies corporate exemption and the employee records exemption in the *Privacy Act*. Our respect for privacy is paramount. We have policies and procedures to ensure that all personal information is handled in accordance with Australian Privacy Principles.

This Privacy Policy sets out our policies on the management of personal and credit information - that is, how we collect this information, the purposes for which we use it, and to whom it is disclosed.

## 1. What is personal information?

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Personal information is information that could identify you. Examples of personal information include your name, address, telephone number and email address, or more complex information like a resume or credit history.

## 2. How does Orora collect and use your personal information?

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Some of the ways in which Orora collects personal information is when you send a job application to us or when you email us. Orora also collects personal information when you apply for a credit account with one of our businesses. These uses are discussed below.

## 3. What happens if you don't provide personal information?

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Generally, you have no obligation to provide any personal information to us. However, if you choose to withhold personal information or use a pseudonym, we are unlikely to be able to respond to your application or query.

## 4. To whom do we disclose personal information?

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We engage third party service providers, and related companies of Orora, to perform functions for Orora. Such functions include mailing, delivery of purchases, credit card payment authorisation, trend analysis, external audits, market research, promotions and the provision of statistical sales information to industry bodies.

For our service providers to perform these functions, in some circumstances it may be necessary for us to disclose your personal information to those suppliers. Where disclosures take place, we work with these third parties to ensure that all personal information we provide to them is kept secure, is only used to perform the task for which we have engaged them and is handled by them in accordance with the Australian Privacy Principles.

Please note that information supplied to our online recruitment website may be stored and processed by third party service providers in the USA.

## 5. How do we protect personal information?

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At all times, we take great care to ensure your personal information is protected from unauthorised access, use, disclosure or alteration.

We endeavour to ensure that our team members are aware of, and comply with, their obligations in relation to the handling of personal information. Only properly authorised team members are permitted to see or use personal information held by Orora and, even then, only to the extent that is relevant to their roles and responsibilities. Your personal information will not be sold to any other organisation for that organisations' unrelated independent use. Further, we will not share your personal information with any organisations, other than those engaged by us to assist us in the provision of our products and services (as described above).

## 6. What about information you provide in job applications?

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If you submit a job application to Orora, we will use the information provided by you to assess your application. In certain circumstances, Orora may disclose the information contained in your application to contracted service providers for purposes such as screening, aptitude testing, medical testing and human resources management activities.

As part of the application process, in certain circumstances, you may be required to complete a pre-employment health questionnaire. You may also be asked to undergo a pre-employment medical assessment. In that case, you will be asked to give specific consent to Orora to disclose your questionnaire to its service providers for the purposes of arranging the medical assessment and for the relevant service providers to disclose the results of the assessment to Orora.

If you refuse to provide any of the information requested by Orora, or to consent to the disclosure of the results of your medical assessment to Orora, we may be unable to consider your application.

## 7. Is the personal information we hold accurate?

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We endeavour to maintain your personal information as accurately as reasonably possible. However, we rely on the accuracy of personal information as provided to us both directly and indirectly. We encourage you to contact us if the personal information we hold about you is incorrect or to notify us of a change in your personal information. Our contact details are set out below.

## 8. How can you access or correct the personal information we hold about you?

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Wherever possible and appropriate, we will let you see the personal information we hold about you and correct it if it is wrong. If we do not allow you access to any part of the personal information we hold about you, we will tell you why and notify you of available complaint mechanisms.

If you wish to obtain access to your personal information held by us, or to request us to correct any errors in that information, please contact us by:

- Phoning the Privacy Compliance Officers on +61 3 9811 7111
- Emailing [PCO@ororagroup.com](mailto:PCO@ororagroup.com)
- Writing to our Privacy Compliance Officer at Orora Limited, 109 Burwood Road, Hawthorn, Victoria 3122, Australia
- Sending a fax to +61 3 9811 7171

We may change our Privacy Policy from time to time at our discretion and without notice. At any time, the latest version is available from our website at [www.ororagroup.com](http://www.ororagroup.com).

## 9. How does Orora handle credit information?

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If you apply for a credit account with an Orora business, we may request credit information from you or a credit reporting body, and disclose the information we receive to one or more credit reporting bodies, in accordance with the *Privacy Act*.

The information we collect and hold includes identification information such as your name and address, the type and amount of credit applied for, the fact that information was requested from a credit reporting body (and the information received following such a request), any court judgments relating to credit provided to you in the past, and information relating to your solvency from the National Personal Insolvency Index.

We use this information to assess your credit worthiness for a trading account and (where applicable) to register interests on the Personal Property Securities Register. If you nominate Orora as a commercial reference to a third party, we may provide limited credit information to that third party.

## 10. How can you make a complaint about a privacy matter?

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If you wish to make a privacy-related complaint, please contact us by phone, email or letter. Our details are set out above.

Complaints will be handled by our Privacy Compliance Officer, with serious issues being escalated to senior management personnel. We will endeavour to respond to your complaint within a reasonable timeframe.

## 11. Orora's internet policy

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Orora generally only collects personal information from its website when it is provided voluntarily by you. For example, when you send us an electronic message with a query about Orora or its products, we will generally use your information to respond to your query, to provide and market our services to you or as otherwise allowed or required by law.

For the same purposes, Orora may share your information with other members of the Orora group (including those who are located outside Australia) and their respective service providers, agents and contractors. If we do this, we require these parties to protect your information in the same way we do.

When you visit this website or download information from it, our Internet Service Provider (ISP) makes a record of your visit and records the following information:

- Your internet address;
- Your domain name, if applicable; and
- Date and time of your visit to the website.

Our ISP also collects information such as the pages our users access, the documents they download, links from other sites they follow to reach our website, and the type of browser they use. However, this information is anonymous and is only used for statistical and website development purposes.

We use a variety of physical and electronic security measures, including restricting physical access to our offices, firewalls and secure databases to keep personal information secure from unauthorised use, loss or disclosure. However, you should keep in mind that the internet is not a secure environment. If you use the internet to send us any information, including your email address, it is sent at your own risk.

You have a right of access to personal information we hold about you in certain circumstances. If we deny your request for access we will tell you why. Please contact our Privacy Compliance Officer to ask for access to your information or if you have a complaint concerning your information privacy (contact details are set out above).

## 12. Use of cookies

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A cookie is a small message given to your web browser by our web server. The browser stores the message in a text file, and the message is then sent back to the server each time the browser requests a page from the server.

Orora makes limited use of cookies on this website. Cookies are used to measure usage sessions accurately, to gain a clear picture of which areas of the website attract traffic and to improve the functionality of our website.

When cookies are used on this website, they are used to store information relating to your visit such as a unique identifier, or a value to indicate whether you have seen a web page. We use session (not permanent) cookies. They are used to distinguish your internet browser from the



thousands of other browsers. This website will not store personal information such as email addresses or other details in a cookie.

Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to notify you each time a cookie is sent to your computer, giving you the choice whether to accept it or not.

12 March 2014