

Business & Quality Management System

Policy Title:	Privacy Policy			Version:	2
Department		Dept No	Policy No	Approved by:	Managing Director
Human Resources		3	03POL02	Issued:	17/Dec/2018

1.0 Purpose

- 1.1 This Privacy Policy outlines the obligations which Rheinmetall Defence Australia and New Zealand (“RDA” or “the Company”) has in managing personal information. It also describes what personal information is held, and how that information is collected, held, used and disclosed.
- 1.2 The Privacy Policy in respect to the management of personal information of customers, potential customers, contractors and others is dealt with separately.
- 1.3 This Policy seeks to satisfy the requirements under Australian, New Zealand and European Privacy requirements.

2.0 Responsibilities

- 2.1 The Company is responsible for:
 - 2.1.1 Compliance with National Privacy Laws; and
 - 2.1.2 Ensuring Personal Information is used in accordance with the reason for collection, and is stored in a secure manner.
- 2.2 Employees must respect the confidentiality of personal information and the privacy of individuals.

3.0 Definitions

- 3.1 In this Policy the Company means:
 - 3.1.1 Rheinmetall Defence Australia;
 - 3.1.2 Rheinmetall MAN Military Vehicles Australia;
 - 3.1.3 Rheinmetall Electronics;
 - 3.1.4 Logistics Solutions Australasia
- 3.2 “Personal Information” is information or an opinion relating to an individual which can be used to identify that individual.
- 3.3 “Sensitive Information” includes information relating to a person’s racial or ethical origin, political opinions, religion, trade union or other professional or trade association membership, sexual preference, criminal records and health information about an individual.
- 3.4 “Security Checks” refers to the process undertaken to obtain a national Defence security clearance.

4.0 Application of Applicable Laws

- 4.1 As far as the permissibility of the collection and use of personal information is concerned, the national law of the respective country where the personal information is collected and used shall apply:
 - 4.1.1 In Australia, the applicable law is the *Privacy Act 1988*.
 - 4.1.2 In New Zealand, the applicable law is the *Privacy Act 1993*.
 - 4.1.3 In Europe, the applicable laws are the General Data Protection Regulations (“GRPD”).

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4.2 The provision of personal information is neither required by law or contract, nor is an individual obliged to provide personal data. Notwithstanding this, the provision of personal information in the context of an application for employment or Veterans Engagement is necessary in order to evaluate the suitability of a candidate for available and suitable positions. The Company will not be able to consider an individual when selecting candidates unless personal information is provided to assess the suitability of engagement.

5.0 Collection of Personal Information

5.1 The Company collects and processes the following personal information (which may in certain circumstances include sensitive information) about you:

5.1.1 Information you give us. This is information about you that you give us by filling in forms, face to face meetings, interviews or by corresponding with us by phone, email, text messaging, direct mail, online or otherwise. It also includes information you provide us through electronic or hard copy business cards.

5.1.2 In some circumstances, the Company may be provided with personal information about an individual from a third party, such as a recruitment agency or from the Veterans Community.

5.1.3 The Company collects personal information in respect to applications for a job, or for the Veterans Engagement Program. The information collected from applicants may include contact details, job application, curriculum vitae, covering letter, or references provided. It may also include sensitive personal information, which is relevant to the application, for which the Company will require explicit consent to collect and retain.

5.1.4 The Company collects personal information from visits to the Company websites. The Company may use third parties to analyse traffic on websites which may involve the use of technical data and cookies.

6.0 Sensitive Information

6.1 Some Personal Information is considered 'sensitive information'. The Company will only collect this information with an individual's consent, and the Company will advise the purpose for collecting any sensitive information.

6.2 Sensitive information includes racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of a professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record.

6.3 Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or where certain other limited circumstances apply, for example, where required by law.

6.4 During a Company process for recruitment, or participation in the Veterans Engagement Program, the Company may collect information, such as, but not limited to an individual's:

6.4.1 membership of a professional association, such as Engineers Australia;

6.4.2 medical condition that may impact the ability to safely perform a role;

6.4.3 criminal record for the purpose of conducting criminal and security checks.

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7.0 Security of Personal Information

- 7.1 National Privacy laws require the Company to take all reasonable steps to protect the security of personal information.
- 7.2 The Company uses a variety of physical and electronic security measures, including restricting physical access to our offices, network firewalls, and secure databases to keep personal information secure from misuse, interference and loss, and unauthorised access, modification or disclosure.

8.0 Disclosure of Personal Information

- 8.1 The Company makes every effort to protect personal information, however, the Company may use and disclose personal information for the primary purpose for which it is collected, for reasonable expected secondary purposes which are related to the primary purpose and other circumstances authorised by the national Privacy law.
- 8.2 Personal information may also be shared within the worldwide Rheinmetall Group of companies for the purpose of identifying and qualifying candidates for current and future career opportunities within the organisation. When we share personal information, we do so in accordance with the Company’s data privacy and security requirements.
- 8.3 Depending on the position you are applying for, your personal information may be transferred to Rheinmetall Group companies overseas when the job description includes a relocation, secondment, or your background may be suitable for an international managerial position. In order to ensure a suitable level of data protection to Australian citizens in these overseas countries, all companies there shall comply with the General Data Protection Regulation (GDPR). The GDPR is a European Regulation (law, or binding scheme), that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way the APPs protect the information, and provides mechanisms which can be accessed by the individual to enforce that protection of the law or binding scheme.

9.0 Retaining Personal Information

- 9.1 The Company may be required to use and retain information for legal and compliance reasons such as the prevention, detection, or investigation of a crime, loss prevention or fraud. The Company may also use personal information to meet internal and external audit requirements, information security purposes, and as otherwise believed to be necessary and appropriate under applicable law.
- 9.2 Job and Veterans Engagement applicant data will be stored for an additional six (6) months after the application process has finished. If an individual provides consent to store data for future opportunities, the Company will store data for additional 24 months.

10.0 Accessing/Correcting/Deleting/Deactivating Personal Information

- 10.1 The Company will, at an individual’s request, provide access to any personal information which is held, subject to some exceptions allowed by any applicable law. In the event an individual wishes to access personal information which the Company holds they should refer to clause 11 of this Policy.
- 10.2 Job applicants registered on the Company recruitment system can review and update personal information at any time using their login details.

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- 10.3 In accordance with the General Data Protection Regulation (GDPR), an individual have the following rights:
- 10.3.1 Right to deletion – that is, the right to have personal information deleted under applicable laws; however this is not an absolute right and may only apply in certain circumstances.
 - 10.3.2 Right to restrict processing - this means the Company can store an individual's personal information but is are limited in the way in which it can be processed.
 - 10.3.3 Right to data portability – this means that an individual can make a request for personal information to be made available to the individual, or organisation acting on behalf of the individual.
 - 10.3.4 Right to object – this means the individual has the right to object to personal information being processed.
 - 10.3.5 Rights related to automated decision making – this means that for decisions that are made about an individual using their personal information, the individual can make a request for those decisions to be made by a human rather an automated.

11.0 Further Information

- 11.1 For further information about this Policy, please seek the assistance of the Human Resource Department, via:
- 11.1.1 Your local HR Representative;
 - 11.1.2 Level 15, 575 Bourke Street, Melbourne, Victoria, 3000; or
 - 11.1.3 RDA.HRAssist@rheinmetall.com
- 11.2 For information about privacy generally, or if you concerns are not resolved to your satisfaction, you may contact the government agency or judicial body in your country that administers the applicable privacy law. In Australia, you may contact Office of the Australian Information Commissioner at www.oaic.gov.au and on 1300 363 992.

12.0 Complaint Mechanism

- 12.1 An individual is able to make a complaint concerning the Company's Privacy Policy or a possible breach. Any complaint will be responded to within a reasonable time in consideration of the details of the complaint.
- 12.2 The Company will take all necessary measures to rectify any non-compliance of this Policy within reasonable time limits.

13.0 Forms and Records

- 13.1 None

14.0 Attachments

- 14.1 None

15.0 Related Documents

- 15.1 None

16.0 References

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16.1 None

17.0 Revisions

Document Authorities:			
	Name	Title	Date
Prepared	Kate Sykes	Senior HR Consultant	16 Nov 2018
Reviewed	Tino Tezel	Datenschutzbeauftragter (RMMV/RMMVÖ) Data Compliance Manager	16 Nov 2018
Reviewed	Fiona Ryan	Employee and Industrial Relations Manager	12 Dec 2018
Reviewed	Mary Vaz	Director Human Resources	13 Dec 2018
Reviewed	Joshua Stewart	Director Legal & Compliance	14 Dec 2018
Reviewed	Jacek Skoraczynski	Quality Manager	17/Dec/2018
Approved	Gary Stewart	Managing Director	14 Dec 2018
Released	Mary Vaz	Director Human Resources	17/Dec/18
Revision History:			
Revision	Date	Description of changes	Approved
1.0	01 Sep 2016	Initial Release	31 Aug 2016
2.0	14 Dec 2018	Contemporised the policy, changed department ownership and policy number.	14 Dec 2018
3.0			