



PARAWAY
PASTORAL CO.

Privacy Policy

2025

Privacy Policy

Version	Board / Management Policy	Effective date	Next review
4.0	Management	2025	2027
Purpose	To notify and explain to individuals how Paraway collects, holds, uses and discloses their personal information		
Scope	All Paraway directors, executive, staff and contractors are required to handle personal information in accordance with Paraway's commitments in this Privacy Policy		

1. Policy Statement

Paraway Pastoral Company and its related entities (Paraway) is committed to treating the personal information it collects in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth). This Privacy Policy sets out how Paraway manages personal information.

This Privacy Policy does not apply to personal information held by Paraway that is not subject to the Privacy Act, for example, Paraway's handling of employee records in some circumstances.

2. Personal information, sensitive information and how and why we collect it

Personal information is information or an opinion that identifies an individual.

Sensitive information is a subset of personal information, and is defined in the Privacy Act to include information or an opinion about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation or practices, criminal record, religious affiliation, membership of a political, professional or trade association or trade union, health and genetic information, and biometric information in some circumstances.

We collect and hold personal information of:

- our employees – such as name, contact details, financial information and some health information (such as immunisation (or waiver) information and health information in the event of a safety incident or claim);
- personnel of our contractors – such as name, contact details and health information in some circumstances (such as in the event of a safety incident or claim). We may also handle other types of information such as financial information if the contractor is a sole trader;
- personnel of suppliers and customers – such as name and contact details. We may also handle other types of information such as financial information if the supplier or customer is a sole trader;
- job applicants – such as name, contact details, qualifications, work history and any other information provided by the applicant;
- visitors to our sites – such as name, contact details and image (if captured on CCTV);

- people who contact us – such as name and contact details

We generally collect personal information directly from you. However, we sometimes collect personal information passively such as via CCTV at our sites, or by monitoring the use of our website and systems. We may also collect personal information from third parties in the following circumstances:

- we may collect personal information about a job applicant from the job applicant's nominated referee;
- we may collect personal information about personnel of our contractors, suppliers and customers where it is provided by the contractor, supplier or customer to us.

We use personal information for the primary purpose for which it was collected, which may be:

- for employees – to manage our employment relationship and for safety and security purposes;
- personnel of our contractors– to receive services, to manage our business relationship and for safety and security purposes;
- personnel of our suppliers and customers – to deliver and receive goods and services and to manage our business relationship;
- job applicants – to assess your application for employment;
- visitors to our sites – for safety and security purposes; and
- people who contact us – to respond to your communication.

We may also use personal information for the purposes of:

- undertaking our business including administrative, accounting, audit, insurance, management, planning, analysis (including to monitor and improve operations), record keeping, archiving, risk management, staff training, marketing, monitoring and investigating fraud, responding to complaints, for identity verification, and considering job applicants for roles other than the role applied for;
- fulfilling our legal obligations such as those relating to insurance and taxation; and
- for other purposes authorised by you.

There are also limited other circumstances where we are permitted by law to use your personal information, such as to comply with orders from a court or tribunal or other law enforcement related activities.

3. How we store your information

Your personal information may be kept in physical and electronic records at locations owned and operated by Paraway and on the premises and systems of our service providers. This may include storage in the cloud, on servers located in Hong Kong, Japan, Malaysia, New Zealand, Singapore and South Korea.

We take steps to store your personal information in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification, or disclosure.

4. Disclosure of Personal Information

In some circumstances, your personal information may be disclosed to third parties, such as:

- to service providers who provide services to Paraway in connection with our business (including accounting, banking, legal, insurance, investigation, identity verification, website and technology services);
- to comply with any legal or regulatory obligations;
- to third parties where you consent to the use or disclosure;
- publicly online, where you have consented to us using a photo of you on our website or in our publications; and
- otherwise, as permitted by law, such as for law enforcement purposes.

In the ordinary course of business, other than in the context of data storage (addressed in the section above), we do not disclose your personal information to recipients located outside Australia.

5. Website visitors and cookies

When you visit Paraway's websites, we may use cookies and other web browser technologies to collect information such as the server your computer is logged into, your browser type and your IP address. We may also derive the location associated with the IP address.

The information we collect from website visitors is not connected with an identifiable person.

6. Accessing and correcting personal information we hold

You may request access to or correction to the personal information we hold about you, subject to certain exceptions, by contacting us – our details are set out in the "Complaints and Enquiries" section below. You will be provided with reasons for any refusal for access and/or corrections to your personal information.

7. Complaints and Enquiries

Any queries, requests or complaints about your privacy, including our compliance with privacy obligations and this Privacy Policy, may be addressed to the Company Secretary and sent to admin@paraway.com.au or 70 McNamara Street, Orange, NSW 2800.

We take any complaints seriously and will respond within a reasonable time.

If you are unhappy with our response to your complaint, you can direct your complaint to the Office of the Australian Information Commissioner at:

Office of the Australian Information Commissioner (OAIC)

GPO Box 5288

Sydney NSW 2001

website for online submission: www.oaic.gov.au

8. Updates to this Privacy Policy

We may update this Privacy Policy from time to time by posting a revised version on our website.

9. Supporting Documents

Legislative Compliance	This policy supports Paraway's compliance with the following legislation: • Privacy Act 1988 • Australian Privacy Principles

Document Governance

Document approver		Management
Document owner		Company Secretary
Review cycle		Biennial
Version	Approved by	Date
1.0	Board	May 2021
2.0	Board	February 2022
3.0	Board	May 2023
4.0	Management	2025