ACT Recycling Pty Ltd
ACN 104 344 390 / ABN 14 104 344 390
499 Mugga Lane, SYMONSTON ACT 2609
Ph: 02 6239 7916
E: invoices@actrecycling.com.au
W: www.actrecycling.com.au

PRIVACY POLICY

Last updated: 21 September 2026

1. INTRODUCTION

ACT Recycling Pty Ltd (ACN 104 344 390) ("**ACT Recycling**", "**we**", "**us**" or "**our**") manages and recycles construction and demolition (C&D) waste. We operate from the Mugga Lane Resource Management Centre (Mugga Lane RMC), located at 499 Mugga Lane, Symonston ACT 2609.

We are committed to protecting the privacy of personal information we collect, hold, use and disclose in the course of our business. This Privacy Policy explains how we handle personal information in accordance with the *Privacy Act 1988* (Cth) ("**Privacy Act**") and the thirteen Australian Privacy Principles ("**APPs**").

This policy is available free of charge on our website at www.actrecycling.com.au and in hard copy on request from our office.

Anonymity and Pseudonymity

You must identify yourself when applying for credit facilities, providing a personal guarantee, presenting identification at our weighbridge, entering our site for WHS compliance purposes, or where identification is required or authorised by law.

Where it is lawful and practicable, you have the option of not identifying yourself, or of using a pseudonym, when dealing with us. For example, you may make a general enquiry about our services or pricing without providing your name.

Automated Decisions

ACT Recycling does not currently use automated computer programs to make decisions using personal information that could reasonably be expected to significantly affect the rights or interests of individuals. If this position changes, we will update this Privacy Policy to describe the types of personal information used, the kinds of decisions made, and how individuals may obtain information about or seek review of those decisions.

2. KINDS OF PERSONAL INFORMATION WE COLLECT & HOLD

The types of personal information we collect and hold depend on the nature of your dealings with us. We may collect and hold the following categories of personal information:

2.1 Customer and Account Information

- Company or business name, ABN, ACN, trading name and business structure.
- Nature of business and date business commenced.
- Business address and postal address.
- Phone number and mobile number.
- Accounts contact name and purchasing officer name.
- Accounts email address.
- Invoice and email delivery preferences.
- Truck registration numbers linked to customer accounts.

2.2 Owner, Director and Partner Information

- Full names.

- Dates of birth.
- Positions and occupations.
- Residential addresses.

2.3 Government-Related Identifiers

We collect the following government-related identifiers, which are classified as **sensitive information** under the Privacy Act:

- Driver's licence numbers (collected from directors, partners, sole traders and guarantors as part of the credit application process).

ACT Recycling will not adopt a government-related identifier (such as a driver's licence number) as its own identifier for any individual. We will only use or disclose a government-related identifier where it is reasonably necessary to verify identity for the purposes of our credit assessment processes, or where the use or disclosure is required or authorised by or under an Australian law or a court or tribunal order.

2.4 Banking and Financial Information

- Bank name, branch and account details (as provided on credit applications).

2.5 Trade Reference Information

- Names, contact details and payment history information provided by trade referees nominated by credit applicants.

2.6 Guarantor Information

- Full names and residential addresses of individuals providing personal guarantees and indemnities.
- Signatures of guarantors and witnesses.
- Personal financial exposure arising from guarantee obligations.

2.7 Credit Information and Credit Eligibility Information

As a credit provider, we collect and hold:

- **Credit information**: identification information, consumer credit liability information, repayment history information, default information, payment information, new arrangement information, court proceedings information, personal insolvency information and publicly available information relating to an individual's creditworthiness;
- **Credit eligibility information**: information we obtain from credit reporting bodies (CRBs) in the form of credit reports, and any information we derive from that CRB data.

2.8 Weighbridge and Transaction Information

- Identification collected from non-account customers at the weighbridge (suitable identification or a cash deposit is required prior to disposal of material or pick-up of product).
- Additional identification for transactions above prescribed thresholds.
- Vehicle registration numbers, load weights and waste or product types.

2.9 Site Access and Safety Information

- CCTV and site surveillance footage captured for work health and safety (**WHS**) and security purposes.
- Visitor and site access records maintained for WHS compliance under the *Work Health and Safety Act 2011* (ACT).

2.10 Other Information

- Correspondence and communications with us (including emails, letters and phone calls).
- Any other personal information you provide to us in the course of dealing with ACT Recycling.

3. HOW WE COLLECT PERSONAL INFORMATION

3.1 Collection Directly from You

Where it is reasonable and practicable to do so, we collect personal information directly from you. This may occur when you:

- Complete a credit application form (Form F400);
- Provide a personal guarantee and indemnity;
- Present identification at our weighbridge;
- Enter our site at the Mugga Lane Resource Management Centre;
- Contact us by phone, email or in person;
- Visit our website at www.actrecycling.com.au; and/or
- Provide trade references in support of a credit application.

3.2 Collection from Third Parties

In some circumstances, we may collect personal information about you from third parties, including:

- Credit reporting bodies (CRBs), from whom we obtain credit reports for the purposes of assessing credit applications and managing credit accounts;
- Trade referees nominated by credit applicants;
- Other credit providers;
- Publicly available sources (such as ASIC company records and court records); and/or
- Debt collection agencies.

3.3 Necessity and Consent

We only collect personal information that is reasonably necessary for one or more of our functions or activities. We do not collect personal information just because an opportunity arises.

Where we collect **sensitive information** (such as driver's licence numbers), we will only do so with your consent and where the information is reasonably necessary for our functions or activities. By providing a completed credit application, you consent to our collection of the sensitive information requested in that form.

If you choose not to provide the personal information we request, we may not be able to provide you with credit facilities or other services.

3.4 Notification of Collection

We will take reasonable steps to notify you of certain matters at or before the time we collect your personal information, or as soon as practicable afterwards if prior notice is not practicable. These matters include our identity and contact details, the purposes of collection, the types of entities to which we usually disclose personal information, how to access our Privacy Policy, whether the collection is required or authorised by law, the consequences of not providing your personal information, and whether we are likely to disclose personal information overseas.

3.5 Unsolicited Personal Information

If we receive personal information that we did not solicit, we will within a reasonable period assess whether we could have collected the information under this policy. If we determine that the information could not have been collected in accordance with this policy, we will destroy or de-identify the

information as soon as practicable, unless it is contained in a Commonwealth record or it would be unlawful or unreasonable to do so. If the unsolicited information could have been collected under this policy, we will handle it in accordance with this policy and the APPs.

4. HOW WE HOLD & STORE PERSONAL INFORMATION

ACT Recycling takes reasonable steps, including both technical and organisational measures, to protect the personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure. In determining what steps are reasonable, we consider the nature and sensitivity of the information, the possible adverse consequences of a breach, our size and resources, and the practical implications of implementing security measures.

We store personal information in the following ways:

- Physical records (such as completed credit application forms and guarantee documents) are stored in locked cabinets at our premises at 499 Mugga Lane, Symonston ACT 2609, with access restricted to authorised personnel;
- Electronic records are stored in secure computer systems and software applications with password protection and access controls; and
- CCTV footage is stored on secure digital recording systems with restricted access.

We actively consider whether personal information we hold is still needed for any permitted purpose and conduct scheduled reviews to identify information that should be destroyed or de-identified. Destruction of physical records is carried out by secure methods (such as cross-cut shredding), and electronic records are irretrievably deleted or put beyond use.

In addition to the storage measures listed above, our security program includes: governance arrangements with designated privacy responsibilities; regular staff training on privacy and information security obligations; ICT security measures including access controls, password policies, and encryption of sensitive electronic data where appropriate; management of third-party service providers who access personal information, including contractual confidentiality and security obligations; physical security controls including restricted site access, alarm systems, and secure disposal of physical records.

5. PURPOSES OF COLLECTION, USE & DISCLOSURE

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

- Assessing credit applications, including verifying the identity, financial standing and creditworthiness of applicants, directors, partners and guarantors;
- Managing customer accounts and credit facilities, including setting and reviewing credit limits;
- Processing waste disposal and recycling transactions, including weighbridge operations;
- Processing the sale and supply of recycled products;
- Obtaining credit reports from credit reporting bodies and providing information to credit reporting bodies;
- Managing, administering and enforcing personal guarantees and indemnities;
- Verifying the identity of individuals attending our site or transacting with us;
- Invoicing, payment processing and debt recovery;
- Complying with our legal and regulatory obligations, including under the Privacy Act, the *Work Health and Safety Act 2011* (ACT), the *Environment Protection Act 1997* (ACT), the *Waste Management and Resource Recovery Act 2016* (ACT) and the *Recycling and Waste Reduction Act 2020* (Cth);
- Site safety and security, including monitoring through CCTV and maintaining visitor access records;

- Internal business operations and administration, including staff training and quality assurance;
- Responding to enquiries and complaints; and / or
- Enforcing our contractual rights, including under our Terms and Conditions of Trade.

We will not use or disclose your personal information for a purpose other than the primary purpose for which it was collected (a "secondary purpose") unless:

- you have consented to the secondary use or disclosure;
- you would reasonably expect us to use or disclose the information for the secondary purpose, and that purpose is related to the primary purpose of collection (or, in the case of sensitive information, directly related);
- the use or disclosure is required or authorised by or under an Australian law or a court or tribunal order; or
- an exception under the Privacy Act applies.

6. CREDIT REPORTING

6.1 Types of Credit Information We Collect

We may collect and hold the following types of credit information about you:

- Identification information (such as your name, date of birth, driver's licence number and address);
- Consumer credit liability information (details of your credit accounts, including the name of the credit provider, the type of credit, the date the account was opened, the credit limit and the date the account was closed);
- Repayment history information (whether you have met your payment obligations on time);
- Default information (details of overdue payments of $150 or more that are at least 60 days overdue);
- Payment information (details of payments made in respect of a default that has been listed);
- New arrangement information (details of new credit arrangements entered into following a default);
- Court proceedings information (judgments entered against you relating to credit);
- Personal insolvency information; and o/ or
- Publicly available information relating to your creditworthiness.

6.2 Credit Eligibility Information

Credit eligibility information includes:

- Information we obtain from credit reporting bodies (CRBs) in the form of credit reports; and
- Information we derive from CRB data (for example, an internal credit score or risk assessment based on the information in a credit report).

6.3 Purposes for Obtaining Credit Reports

We may obtain a credit report about you from a CRB for the following purposes:

- to assess a credit application made by you or a business with which you are associated (as a director, partner, sole trader or guarantor);
- to manage an existing credit account, including reviewing credit limits;
- to collect overdue payments owed to us; and / or

- to assess whether to accept a personal guarantee.

6.4 Disclosure of Information to CRBs

We may disclose personal information about you to CRBs for the following purposes:

- to obtain a credit report about you;
- to allow the CRB to maintain the currency and accuracy of credit information it holds;
- to list a default on your credit file (where a payment of $150 or more is at least 60 days overdue and we have taken reasonable steps to recover the debt and provided you with written notice); and / or
- to update payment or new arrangement information in relation to a previously listed default.

6.5 Your Rights in Relation to Credit Information

You have the following rights in relation to your credit information:

- **Access:** You may request access to the credit information and credit eligibility information we hold about you.
- **Correction:** You may request that we correct credit information or credit eligibility information that is inaccurate, out of date, incomplete, irrelevant or misleading.
- **Complaints:** You may make a complaint about how we have handled your credit information.
- **CRB rights:** You may request that a CRB not use your credit reporting information for the purposes of pre-screening or direct marketing by contacting the relevant CRB directly.

6.6 Obtaining a Copy of Your Credit Report

You may obtain a copy of your credit report directly from the relevant CRB. The main CRBs operating in Australia are:

- Equifax Australia — www.equifax.com.au — Phone: 138 332
- Illion (formerly Dun & Bradstreet) — www.illion.com.au — Phone: 1300 734 806
- Experian Australia — www.experian.com.au — Phone: 1300 783 684

You are entitled to one free credit report from each CRB every twelve months.

For more information about the credit reporting framework, refer to the Privacy (Credit Reporting) Code 2025 and the guidance published by the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au.

7. DIRECT MARKETING

ACT Recycling may from time to time use your contact information to send you communications about our services, pricing updates or operational changes that are relevant to your account or transactions with us. All direct marketing communications from ACT Recycling will clearly identify ACT Recycling as the sender.

We will only use your personal information for direct marketing purposes where you would reasonably expect us to do so, or where you have consented.

You may opt out of receiving direct marketing communications from us at any time by:

- contacting us at invoices@actrecycling.com.au or on 02 6239 7916; or
- following any unsubscribe instructions included in the communication.

We will process your opt-out request promptly and free of charge.

If you request us to identify the source of the personal information used for direct marketing, we will provide that information free of charge within a reasonable period.

ACT Recycling does not sell or rent personal information to third parties for their marketing purposes.

8. CROSS-BORDER DISCLOSURE OF PERSONAL INFORMATION

ACT Recycling does not currently disclose personal information to overseas recipients. All personal information we collect is stored and processed within Australia.

If this position changes in the future, we will update this Privacy Policy to identify the countries to which personal information may be disclosed, conduct due diligence on the privacy practices of any overseas recipient, implement appropriate contractual safeguards, and take reasonable steps to ensure that any overseas recipient handles personal information in accordance with the APPs.

9. QUALITY OF PERSONAL INFORMATION

ACT Recycling takes reasonable steps to ensure that the personal information we collect, use and disclose is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

We encourage you to contact us to update your personal information if it changes or if you believe the information we hold is inaccurate or incomplete. You can update your account details by contacting us at invoices@actrecycling.com.au or on 02 6239 7916.

In relation to credit account information, we may periodically verify the accuracy and relevance of data we hold to maintain data quality.

10. ACCESS TO PERSONAL INFORMATION

You have the right to request access to the personal information we hold about you. This includes access to credit information and credit eligibility information held about you.

How to make a request

Access requests should be made in writing to our Privacy Contact. Please provide enough detail to enable us to identify the information you are seeking.

Timeframe

We will respond to your access request within 30 days of receiving the request.

Costs

There is no charge for making an access request. However, we may charge a reasonable fee limited to the cost of locating, retrieving and providing the information. We will advise you of any applicable fee before proceeding, and you will not be charged unless you agree to the fee.

When access may be refused

In some circumstances, we may refuse to provide access to your personal information. This includes situations where:

- providing access would pose a serious threat to the life, health or safety of any individual or to public health or public safety;
- providing access would have an unreasonable impact on the privacy of other individuals;
- the request is frivolous or vexatious;
- providing access would be unlawful or would prejudice enforcement activities; or
- another exception under the Privacy Act applies.

If we refuse your access request, we will provide you with written reasons for the refusal and information about how to make a complaint.

11. CORRECTION OF PERSONAL INFORMATION

You have the right to request that we correct personal information we hold about you that is inaccurate, out of date, incomplete, irrelevant or misleading. This includes credit information and credit eligibility information.

How to make a request

Correction requests should be made in writing to our Privacy Contact. Please explain what information you believe is incorrect and what the correct information should be.

We may require you to verify your identity before we action a correction request, to ensure the security and integrity of personal information.

Timeframe

We will respond to your correction request within 30 days of receiving the request.

If we refuse to correct

If we refuse to correct your personal information, we will:

- provide you with written reasons for the refusal;
- inform you of the complaint mechanisms available to you; and
- at your request, associate a statement with the information noting that you consider it to be inaccurate, out of date, incomplete, irrelevant or misleading.

Where we correct credit information that we have previously disclosed to a CRB or another credit provider, we will take reasonable steps to notify them of the correction.

12. PRIVACY COMPLAINTS

How to make a complaint

If you believe we have breached the APPs, the credit reporting provisions of Part IIIA of the Privacy Act or the CR Code, you may make a complaint in writing to our Privacy Contact:

Privacy Contact

ACT Recycling Pty Ltd

499 Mugga Lane, Symonston ACT 2609

Phone: 02 6239 7916

Email: tanya@samarkos.com.au

Our complaint-handling process

- We will acknowledge receipt of your complaint within 7 days.
- We will investigate your complaint and provide you with a written response within 30 days.
- If we need more time to investigate, we will let you know and keep you informed of our progress.

Escalation to the OAIC

If you are not satisfied with our response to your complaint, or if we have not responded within 30 days, you may escalate your complaint to the Office of the Australian Information Commissioner (OAIC):

Office of the Australian Information Commissioner

Phone: 1300 363 992

Website: www.oaic.gov.au

Post: GPO Box 5218, Sydney NSW 2001

13. NOTIFIABLE DATA BREACHES

If we become aware that an eligible data breach has occurred (that is, a data breach that is likely to result in serious harm to any individual whose personal information is involved), we will:

- take prompt steps to contain the breach and reduce any harm to affected individuals;
- conduct a reasonable and expeditious assessment of the breach to determine whether it is likely to result in serious harm, and take all reasonable steps to complete this assessment within 30 days of becoming aware of the grounds for suspecting an eligible data breach;
- notify the OAIC and affected individuals as soon as practicable after becoming aware that an eligible data breach has occurred; and
- include in the notification a description of the breach, the kinds of information involved, and recommendations about the steps individuals should take in response.

Links to Other Websites

Our website may contain links to external websites that are not operated by ACT Recycling. If you follow a link to an external website, please be aware that the website will have its own privacy policy and practices. We have no control over, and accept no responsibility for, the privacy practices or content of external websites. We encourage you to review the privacy policy of any website you visit.

Children's Privacy

Our services, including site access and credit facilities, are not directed to individuals under the age of 18. We do not knowingly collect personal information from children. If we become aware that we have inadvertently collected personal information from a child, we will take reasonable steps to delete or de-identify that information as soon as practicable.

Third-Party Service Providers

We may engage third-party service providers to assist us in operating our business, including providers of accounting and invoicing software, credit reporting services, debt collection agencies, IT support and maintenance, and CCTV system maintenance. These service providers are given access to personal information only to the extent necessary to perform their services on our behalf and are bound by contractual obligations of confidentiality and security consistent with the Privacy Act. We take reasonable steps to ensure that any third-party service provider handles personal information in accordance with the APPs.

Cookies

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, some portions of our website may not function correctly. For more information about Google's privacy practices, visit https://policies.google.com/privacy. You may opt out of Google Analytics by installing the Google Analytics opt-out browser add-on.

Our website at www.actrecycling.com.au may use cookies and similar technologies to improve your browsing experience, analyse website traffic, and support site functionality. Cookies are small files stored on your device that contain information relating to your browsing session. We may use session cookies (temporary) and analytics cookies (such as Google Analytics) to understand how visitors interact with our website. We do not use cookies for advertising or behavioural profiling.

14. UPFATES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect changes in our information handling practices, legal requirements or business operations.

The current version of this Privacy Policy will always be available on our website at www.actrecycling.com.au. We encourage you to review this policy periodically.

Where a change is significant, we will take reasonable steps to notify affected individuals.

15. CONTACT US

If you have any questions about this Privacy Policy, wish to make an access or correction request, or wish to make a privacy complaint, please contact us:

Privacy Contact

ACT Recycling Pty Ltd

ACN 104 344 390

499 Mugga Lane, Symonston ACT 2609

Phone: 02 6239 7916

Email: finance@actrecycling.com.au

Website: www.actrecycling.com.au