

# Team Member Privacy Notice

**At Woolworths Group, we care about your privacy and are committed to doing the right thing with your personal information. This includes informing you about how we collect, use and share your personal information, the steps we take to help keep it secure, and how you may request access to or correction of the information we hold about you, or make a privacy complaint.**

At Woolworths Group Limited ('Woolworths', 'Woolworths Group', 'we', 'us'), everyone has responsibility for protecting the personal information of our customers, team members, job applicants ('candidates') and other individuals (including visitors, suppliers and service providers).

## What is this Privacy Notice and who does it apply to?

This Notice applies to anyone who works with or is applying for work with Woolworths Group Limited and its wholly owned and controlled entities. This includes all candidates, employees, former employees, contractors, labour hire workers, directors, secondees, interns and trainees working within Woolworths Group (collectively referred to as 'team members' in this Notice), including as part of Woolworths, Woolworths NZ, BIG W, Primary Connect and Support Team.

This Notice explains:

- what personal information we collect, store, use and disclose about you and why
- the steps we take to help keep your personal information secure
- how you can request access to or correction of the personal information we hold about you, or raise a privacy complaint.

To understand how Woolworths Group handles your personal information when you interact with us as a **customer**, please refer to our Woolworths Group [Australian](#) and [New Zealand](#) Privacy Policies.

## What is personal information?

Personal information includes any information or an opinion about a person who can be identified or reasonably identified. Personal information also includes 'sensitive information', such as health information or information about an individual's racial or ethnic origin, religious beliefs, sexual orientation, or criminal record.

## What personal information does Woolworths Group collect about me?

Our aim is to only collect the minimum amount of personal information needed to give you a great experience with Woolworths and to allow us to meet our obligations to you and our workforce.

The types of personal information Woolworths Group collects about you includes:

- **identity and contact information**, such as your name, date of birth, identification documents, photograph, change of name information, home address, mailing address, phone number, email address, emergency contact details
- **recruitment, qualifications and background information**, such as your application for employment, CV, work history, education, qualifications, certifications, licences, right to work, visa and passport information (including for your family if necessary to verify your

right to work or facilitate your relocation for work), referee reports, interview responses (including by video and chat), interview notes, pre-employment medical checks, results of screening, aptitude or psychometric tests, criminal history/police/security checks, information about you on LinkedIn or other public sites, information from recruitment partners or agencies

- **terms of employment or engagement and remuneration related information**, such as your work location/s, hours worked, pay rate or salary, uniform sizing/requirements, incentive payment arrangements, expense claims, leave requests, absences, flexible work arrangements, bank account and superannuation details, membership of unions or professional associations and deductions you ask us to make relating to these, taxation details including tax file number, travel for work or as part of our 'Working from Anywhere' policy, details relating to transfers, secondments and termination of employment
- **financial and other personal interests** about you and your family members relating to actual, perceived or potential conflicts of interest
- **benefits information**, such as details about your membership and use of Everyday Rewards Plus and WOW People Discount Card, as well as details of any secondary cardholder, your participation in our share purchase plan, novated lease arrangements, and salary sacrifice arrangements
- **development, performance and conduct information**, such as training completion, development goals and progress, interest in internal opportunities, performance, conduct, feedback, complaints or investigations, monitoring your actions relating to potential fraud, bribery, corruption, conflict of interest, misuse of benefits or similar activities
- **health and safety related information**, such as pre-employment medicals, medical certificates, fitness for work, injury details, information relating to workers compensation claims, treatment plans, workplace adjustments, and safety incidents or alerts, as well as safety monitoring and surveillance information where it is relevant to your role, such as through devices or equipment that capture your driving behaviours (including signs of fatigue), geolocation data, duress alarm usage, monitoring of exposure to potential hazards in accordance with regulatory health requirements
- **feedback, complaints, survey responses, and other communications** we receive from you or about you, such as through surveys and other listening initiatives, telephone calls, correspondence, complaints or other feedback or requests
- **technology usage**, including your access and use of work-related computers, electronic and communications systems, devices and applications, such as telephone, email, internet, SMS, online chat, video calls and recordings, use of store devices, as well as files and communications created, stored, sent or received on devices, and your use of Woolworths applications on a personal device (BYOD). See our [Code of Conduct](#) and [Acceptable Use of Information Systems Policy](#) for details about team member obligations when using technology for work. We also collect details necessary to give you access to these technologies to authenticate you and to monitor for potential malicious activity, including log in details, IP addresses, cookies and device information
- **access and attendance at Woolworths Group premises** (including stores, distribution centres, vehicles, office locations), such as security pass data, time and attendance records, location data (for example when using certain Woolworths apps like WorkJam and have location data enabled, or geolocation tracking when driving a vehicle for work), vehicle registration number and CCTV footage. If you work in or attend our

stores, we may also capture footage of you through loss prevention and other technologies used in stores, which you can learn more about [here](#)

- **biometric information or templates** collected in limited circumstances when you work in premises or access work-related technologies that process this type of information and you choose to use it, for example to clock in and out of your shift, to manage secure access to store cabinets, to access your work related devices or for other identity verification purposes. There will always be an alternative option available so that you do not need to provide or use your biometric information
- **diversity information** you choose to share with us, such as your ethnicity, cultural identity, spoken language, disability information, sexual orientation, gender identity, pronouns, refugee status or parenting status.

Before you provide personal information about someone else to Woolworths Group (for example, contact details for your referees or your emergency contact details) you must have their permission to do so.

## How does Woolworths Group collect my personal information?

**Woolworths Group collects your personal information directly from you wherever possible, but we will also collect information from other people or sources where necessary or relevant.**

We will collect your personal information directly from you during your recruitment, employment or other engagement with us, and in some cases after it ends (for example, in relation to our 25 Year Club, or to facilitate payments owed to you).

We will also collect information about you in other ways, such as:

- through your use of technologies, apps, devices, websites or monitoring equipment as described in this Notice
- from customers, team members, leaders or others (for example, receiving feedback about you)
- from government or enforcement bodies where necessary, such as the Australian Taxation Office or the Department of Home Affairs
- from third party sources, such as your referees, service providers who conduct screening services, right to work or background checks, claims or treatment providers, team benefits services, public websites (such as LinkedIn or social media sites), or your employing entity where you are seconded or contracted to work with us. These other entities may have their own Privacy Policies and you should review these to understand how they handle your personal information.

## For what purposes does Woolworths Group collect, store, use and disclose my personal information?

**Woolworths Group manages your personal information respectfully and with care for the purposes of managing your recruitment, employment or other engagement with us, which includes caring for your safety and wellbeing, and giving you a positive experience with us.**

We collect, store, use and disclose your personal information (as reasonably necessary) for the following purposes:

- recruitment purposes, like reviewing your suitability for employment, confirming your right to work, your eligibility or qualifications for certain roles, your fitness for work and

otherwise processing your application for employment

- managing and administering your day to day employment or engagement with us, including your attendance, remuneration, superannuation contributions, deductions and reimbursements, leave requests, participation in team benefits, listening initiatives, surveys or other programs, ongoing fitness for work, work-related travel, immigration or relocation, your conduct, safety, unexplained absences, performance, recognition and reward, learning and development, processing feedback, requests or complaints from you or about you, communicating with you, managing flexible work arrangements, workplace adjustments, ending of your employment and providing job references for you
- managing workplace complaints, investigations, incidents, legal proceedings and disciplinary matters, handling safety incidents, emergencies, injuries or concerns, and conducting or participating in audits
- monitoring and managing health and safety of team members, secure and appropriate use of Woolworths' property and information systems, and compliance with internal policies and legal/regulatory obligations
- workforce management and planning, including rostering and scheduling, succession, talent and business continuity planning, mergers and acquisitions, managing productivity, general operation and continuous improvement of Woolworths Group's functions and activities
- managing contractual relationships, including with customers, suppliers and other third parties
- staying in touch with you, such as informing you of job or career development opportunities that may be of interest to you, or communicating with you as a member of our 25 Year Club
- maintaining a supportive, safe and inclusive work environment in support of our Group commitment to inclusion and belonging
- managing remediation or other payments owed to you, including after your employment has ended
- as otherwise required or permitted by law.

We use a range of different tools and technologies to process your personal information. Sometimes this may involve machine learning, for example, to help us understand workforce trends or streamline our recruitment processes.

## Who does Woolworths Group share my personal information with?

We may share your personal information within the Woolworths Group and with other people or entities as reasonably necessary to manage your recruitment, employment or other engagement with us and meet our legal or regulatory obligations, including:

- third parties providing services to Woolworths Group, such as data storage, technology services, payroll or benefits services, recruitment services, travel or mobility/relocation services, insurers or workers compensation claim providers, data analytics and insights providers and our share registry
- external professional advisors, such as lawyers, accountants and auditors
- your emergency contacts, unions, future prospective employers and others you authorise us to share information with

- related companies or prospective purchasers of all or part of our business
- government or enforcement bodies (such as the Australian Tax Office, the Fair Work Commission, the Department of Home Affairs or the Department of Veteran Affairs or the Police) or others, where obliged by law.

Where you are applying for a role with another company for which Woolworths Group provides recruitment services (such as MyDeal or Endeavour Group), we will share your personal information with that company for the purposes of them processing your application and to manage any related employment requirements, in the event you are successful for a role. You will need to refer to that entity's Privacy Policy to understand how they will handle your personal information.

## Does Woolworths Group share my personal information overseas?

We may transfer your information overseas when:

- we engage a service provider that handles data overseas (for example, data storage services commonly involve diverse geographic locations which change from time to time for reasons which include data protection and processing efficiency)
- we share information between various Woolworths Group entities; our main business locations are in Australia and New Zealand, but some of our companies or businesses may be based in other countries from time to time
- our business which collected your personal information is in a different country to your location
- your employment with us necessarily involves overseas disclosures; for example when you undertake work travel to an overseas location.

While it is not practical for us to include a full list of relevant countries outside of Australia or New Zealand to which your personal information may be disclosed from time to time, these may include, United Kingdom, Switzerland, Bangladesh, Thailand, India, South Africa, Hong Kong, Philippines, China and the United States.

## How does Woolworths Group store my personal information and help keep it secure?

We store personal information in computer or online systems, and in hard copy format in certain circumstances, such as when you are employed within stores. Computer or online systems and long term storage of hard copy records may be operated by us or by our trusted service providers.

We implement a range of technical and organisational security measures to help protect your personal information from unauthorised access, loss or misuse. This includes minimising personal information collected and used, conducting security and privacy risk assessments, restricting access to personal information in our systems and premises, and privacy training for team members that handle personal information.

When we disclose personal information to a third party, we take steps to require that the third party protects the information in accordance with Australian and/or New Zealand privacy requirements and only uses it for the purpose for which it is disclosed.

## How can I access or correct my personal information, or make a privacy complaint?

You may request access to or correction of the personal information Woolworths holds about you, or contact us to raise any concerns or a complaint relating to privacy. You can also access and update many of your personal details yourself by logging in to your [employee profile](#) in SuccessFactors or your candidate profile in our recruitment platform.

In some circumstances we may not be able to provide access to or correction of personal information we hold about you, but we will give you an explanation if that is the case.

If you are located outside of Australia or New Zealand, there may be country-specific rules that are relevant to the processing of your personal information or your privacy rights as an individual. We invite you to contact us at [privacy@woolworths.com.au](mailto:privacy@woolworths.com.au) if you have questions about this.

For any of these queries, or to ask any other questions about this Notice, please contact our Privacy teams:

### Woolworths Australia:

**Post:** Privacy Officer, Woolworths Group Limited, PO Box 8000, Baulkham Hills, NSW 2153

**Email:** [privacy@woolworths.com.au](mailto:privacy@woolworths.com.au)

**Telephone:** 1300 908 631

### Woolworths NZ:

**Post:** Privacy Officer, Woolworths NZ Limited, Private Bag 93306, Otahuhu, Manukau

**Email:** [privacyofficer@woolworthsnz.co.nz](mailto:privacyofficer@woolworthsnz.co.nz)

**Telephone:** 0800 40 40 40

We will respond to your request or concern within a reasonable period of time (usually within one month). If you are unhappy with how Woolworths has responded to your privacy request or concern, you may contact the relevant privacy regulator:

### **Australia:**

Office of the Australian Information Commissioner

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Telephone: 1300 363 992

Website: <https://www.oaic.gov.au/>

### **New Zealand:**

NZ Office of the Privacy Commissioner

Email: [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz)

Telephone: 0800 803 909

Website: <https://www.privacy.org.nz/>

## What other privacy terms may apply?

There may be additional privacy notices and terms relevant to you from time to time. For example, there are additional privacy terms that apply when you shop our brands, join and participate in our loyalty program and for use of our online sites.

## How will I know if Woolworths Group makes changes to this Notice?

This Notice is current as of May 2024. We may change it periodically. The most current version is always available on Me@Woolies or by contacting [privacy@woolworths.com.au](mailto:privacy@woolworths.com.au).

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| <b>Document changes</b>  | This notice may be changed at any time, and does not form part of any team member's contract of employment.<br>Version 2.0 |
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