

1. Scope

- 1.1. This Policy applies to the collection, use, disclosure, and handling of the confidential information provided by the participants of the B-cycle scheme by the Battery Stewardship Council (**BSC**).
- 1.2. The BSC uses data provided by participants to operationalise the B-cycle scheme within the ACCC authorisation AA1000476 (Authorisation) and to meet our obligations for transparency and accountability.
- 1.3. The BSC is committed to respecting and protecting the confidentiality of commercially sensitive information of Scheme participants and managing vary information in an open and transparent way.

2. Commitment to data protection

- 2.1. BSC recognises that there may be privacy and security concerns regarding data requirements, therefore we have established robust processes to ensure data is protected.
- 2.2. BSC is committed to protecting all personal and commercially sensitive data. We have conducted a risk analysis and instituted legal mechanisms, policies, and data management procedures to manage data security risks.

3. What information does the BSC collect from participants and why?

- 3.1. The BSC is authorised by the ACCC to administer the B-cycle Scheme in accordance with ACCC Authorisation AA1000476 (Authorisation). In order to do so, it is required to collect from scheme participants certain information, which may include the following depending on the participant type:
 - (a) Corporate details of all participants
 - (b) Details of all Drop off points (site, company type, etc)
 - (c) Information required by B-cycle audit and accreditation processes, for example the Collection and Recycling Network Protocols
 - (d) Data regarding weight, chemistry, and types of battery imports
 - (e) Data regarding the levy being passed to consumers
 - (f) Data on the numbers, chemistries and types of batteries being collected, sorted and processed
 - (g) Financial information related to the operation of collection, sorting and processing activities.

4. Participant Information

- 4.1. The BSC acknowledges that some of this information may have commercial sensitivities for Participants; and takes all reasonable steps to ensure that such information is only collected as reasonably necessary to be able to administer the scheme in accordance with the Authorisation.
- 4.2. Once collected information is no longer useful or required for validation purposes, the BSC will delete these files.

5. How the BSC collects Participant Information

- 5.1. The BSC may collect Participant Information in a number of ways, including:
 - (a) directly from participants through the reporting requirements of the Scheme
 - (b) in the course of providing guidance or information to participants
 - (c) while undertaking audits of participants, as required by the ACCC Authorisation
 - (d) in a business development context
 - (e) from publicly available sources of information.
- 5.2. BSC will not collect Participant Information from a Participant unless the information is reasonably necessary for or is directly related to one or more of BSC's functions or activities.

6. Use of Participant Information by BSC

- 6.1.** BSC may collect, hold and use Participant Information for the following purposes:
- (a) to operationalise the B-cycle Commitment document and Codes of Practice
 - (b) to calculate and pay levies and rebates under the Scheme
 - (c) to ensure Scheme participants are acting in accordance with their obligations
 - (d) to communicate with Scheme participants to verify they are meeting their obligations
 - (e) to communicate with Scheme participants regards scheme activities and outcomes
 - (f) the identification of importers
 - (g) marketing and education purposes
 - (h) to conduct audits as required by the Scheme.
- 6.2.** BSC may store Participant Information in a number of ways, including:
- (a) electronically on its computer databases; and
 - (b) in hard copy, in the offices of relevant management staff or any other storage areas in each of its offices.
- 6.3.** BSC may provide participant information to contractors for the purposes of fulfilling section 6.1. All such provision will be conducted under non-disclosure arrangements.

7. When BSC will use or disclose personal information

- 7.1.** The use or disclosure of a Participant's Information will only be for the purpose for which it was collected or for related secondary purpose (a purpose other than the primary purpose but is related to the primary purpose) unless:
- (a) BSC is under a legal duty or obligation to disclose personal information about the Participant, or BSC is otherwise compelled to disclose such information by an Australian law, or by order of a court or tribunal
 - (b) the Participant has consented to its use or disclosure
 - (c) the Individual would reasonably expect BSC to use or disclose the Participant or the secondary purpose and the secondary purpose is directly related to the primary purpose
 - (d) BSC reasonably believes that the use or disclosure of the information is reasonably necessary for enforcement related activities conducted by or on behalf of BSC.

8. How BSC will protect sensitive data

- 8.1.** The ability of the BSC to protect sensitive data is central to the ongoing success of the Scheme and of our Participant relationships. We will do this by:
- (a) storage of all digital files and data in secure two-factor authentication password protected Cloud based IT environments
 - (b) application of file level passwords on all confidential and sensitive data
 - (c) defined access restrictions and partitions to files and folders for employees based on defined roles and responsibilities
 - (d) employment contracts defining access to and usage of IT systems and confidential data
 - (e) corporate policies for Information Security Management (ISM), Internet Security, Cyber Security, Data Storage, and Incident Management.