

1. Introduction

- 1.1 In the course of our business in Australia, there are circumstances where we collect personal information. This privacy policy has been developed to ensure that such information is handled appropriately.
- 1.2 We are committed to complying with the *Privacy Act 1988* (Cth) (**Privacy Act**) in relation to all personal information we collect. Our commitment is demonstrated in this policy. The Privacy Act incorporates the Australian Privacy Principles (**APPs**). The APPs set out the way in which personal information must be treated.
- 1.3 This privacy policy also incorporates our policy on managing credit information (see particularly section 8 onwards).

Who does the privacy policy apply to?

- 1.4 This policy applies to any person for whom we currently hold, or may in the future collect, personal information.

What information does the privacy policy apply to?

- 1.5 This policy applies to personal information. In broad terms, 'personal information' is information or opinions relating to a particular individual who can be identified.
- 1.6 Information is not personal information where the information cannot be linked to an identifiable individual.

2. How do we manage the personal information we collect?

- 2.1 We manage the personal information we collect in numerous ways, such as by:
 - (a) implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure;
 - (b) providing staff with information on privacy issues;
 - (c) limiting staff access to personal information depending on their role and position;
 - (d) appointing a privacy officer within the business to monitor privacy compliance.
- 2.2 We will take reasonable steps to destroy or permanently de-identify personal information if that information is no longer needed for the purposes for which we are authorised to use it.
- 2.3 In limited circumstances, it may be possible for you to use a pseudonym or remain anonymous when making a general enquiry. If you wish to use a pseudonym or remain anonymous you should notify us when making your enquiry. It is not possible to order from us without providing your details.

3. What kinds of information do we collect and hold?

Personal information - customers

3.1 We may collect and hold personal information about you, which may include:

- (a) contact information;
- (b) financial information;
- (c) date of birth;
- (d) licence information;
- (e) credit information;
- (f) banking details; and
- (g) any other personal or business information required to supply our products to you.

Personal information – prospective employees

3.2 If you are applying for employment with us, we may collect the following information:

- (a) sensitive information (see below);
- (b) contact information;
- (c) financial information;
- (d) date and place of birth;
- (e) employment arrangements and history;
- (f) residency status;
- (g) banking details;
- (h) driver and forklift licence information;
- (i) education information;
- (j) language information; and
- (k) any other personal information necessary for us to consider your employment with us.

Sensitive information – prospective employees

3.3 ‘Sensitive information’ is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.

3.4 We may collect sensitive information if it is relevant to your employment with the company. The sensitive information we may collect about prospective employees could include any of the following:

- (a) health information;
- (b) criminal history; and
- (c) membership of clubs, institutions and societies.

3.5 We otherwise do not collect sensitive information about individuals.

4. How and when do we collect personal information?

4.1 Our usual approach to collecting personal information is to collect it directly from you.

4.2 We may also collect personal information in other ways, which may include:

- (a) from third party providers and suppliers;
- (b) using security cameras at office premises;
- (c) credit checks on sole traders;
- (d) directors' personal credit file;
- (e) other credit managers and trade referees;
- (f) retailers; and
- (g) from our rewards program.

5. How do we hold personal information?

5.1 Our usual approach to holding personal information includes:

- (a) physically, at our premises (securely);
- (b) electronically,
 - (i) on secure online servers; and
 - (ii) by a third-party backup provider.

5.2 We secure the personal information we hold in numerous ways, including:

- (a) finger scan technology to limit access to building premises;
- (b) using secure servers to store personal information;
- (c) using unique usernames, passwords and other protections on systems that can access personal information;
- (d) limiting access to personal information depending on staff role and position; and
- (e) holding certain sensitive documents securely.

6. Why do we collect, hold, use or disclose personal information?

- 6.1 We take reasonable steps to use and disclose personal information for the primary purpose for which we collect it. The primary purpose is generally in connection with supplying our products to your business and to assess your credit worthiness.
- 6.2 In the case of potential employees, the primary purpose the information is collected is to assess the individual's suitability for employment.
- 6.3 Personal information may also be used or disclosed by us for secondary purposes that are within your reasonable expectations and that are related to the primary purpose of collection.
- 6.4 We may disclose personal information to:
 - (a) software providers;
 - (b) credit insurance brokers;
 - (c) transport/freight companies used to deliver our products;
 - (d) any of our professional advisers that we may engage from time to time; and
 - (e) our third-party technology providers such as our data storage providers.
- 6.5 Otherwise, we will only disclose personal information to third parties if permitted by the Privacy Act.

7. Will we disclose personal information outside Australia?

- 7.1 We generally do not disclose personal information outside of Australia.

8. How do we manage your credit information?

What kinds of credit information may we collect?

- 8.1 In the course of supplying our products to you, we may collect and hold the following kinds of credit information:
 - (a) your identification information;
 - (b) information about any credit that has been provided to you;
 - (c) your repayment history;
 - (d) information about your overdue payments;
 - (e) if terms and conditions of your credit arrangements are varied;
 - (f) if any court proceedings are initiated against you in relation to your credit activities;
 - (g) information about any bankruptcy or debt agreements involving you;
 - (h) any publicly available information about your credit worthiness; and
 - (i) any information about you where you may have fraudulently or otherwise committed a serious credit infringement.

- 8.2 In some circumstances, we may collect credit information and personal information from credit reporting bodies (e.g. “Equifax”). The kinds of information we collect may include any of those kinds of information outlined in sections 3.1 and 8.1 of this policy.

How and when do we collect credit information?

- 8.3 In most cases, we will only collect credit information about you if you disclose it to us and it is relevant in supplying our products to you or assessing your eligibility for credit.

How do we store and hold the credit information?

- 8.4 We store and hold credit information in the same manner as outlined in section 4.2(g) of this policy.

Why do we collect the credit information?

- 8.5 Our usual purpose for collecting, holding, using and disclosing credit information about you is to enable us to assess your eligibility for credit and supply our products to you.

Overseas disclosure of the credit information

- 8.6 We will not disclose your credit information to entities without an Australian link unless you expressly request us to.

How can I access my credit information, correct errors or make a complaint?

- 8.7 You can access and correct your credit information, or complain about a breach of your privacy in the same manner as set out in section 9 of this policy.

9. How do you make complaints and access and correct your personal information or credit information?

- 9.1 It is important that the information we hold about you is up-to-date. You should contact us if your personal information changes.

Access to information and correcting personal information

- 9.1 You may request access to the personal information held by us or ask us for your personal information to be corrected by using the contact details in this section.
- 9.2 We will grant you access to your personal information as soon as possible, subject to the request circumstances.
- 9.3 In keeping with our commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of identity.
- 9.4 We may deny access to personal information if:
- (a) the request is unreasonable;
 - (b) providing access would have an unreasonable impact on the privacy of another person;
 - (c) providing access would pose a serious and imminent threat to the life or health of any person; or
 - (d) there are other legal grounds to deny the request.

- 9.5 We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed prior to it being levied.
- 9.6 If the personal information we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date, where it is appropriate to do so.

Complaints

- 9.7 If you wish to complain about an interference with your privacy, then you must follow the following process:
- (a) The complaint must be firstly made to us in writing, using the contact details in this section. We will have a reasonable time to respond to the complaint.
 - (b) In the unlikely event the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

Who to contact

- 9.8 A person may make a complaint or request to access or correct personal information about them held by us. Such a request must be made in writing to the following address:

Privacy Officer: Commerce/Admin Manager

Postal Address: PO Box 6160
Yatala DC, Qld 4207

Telephone number: 07 5540 6600

Email address: ross.forster@beaulieu.com.au

10. Changes to the policy

- 10.1 We may update, modify or remove this policy at any time without prior notice. Any changes to the privacy policy will be published on our website.
- 10.2 This policy is effective October 2014. If you have any comments on the policy, please contact the privacy officer with the contact details in section 9 of this policy.