

# Privacy Policy

In the process of conducting our businesses, we collect a broad range of personal information

## Privacy Policy

### 1. Background

In this privacy policy, "we", "our" and "us" are references to Access 4 Pty Ltd.

For the purposes of this policy, "personal information" means personal information as defined in the Privacy Act 1988 (the "Act"). Essentially, this is any information that can reasonably be used to identify you as a natural person including but not limited to your name, email, contact details and financial information such as credit card details.

This Privacy Policy explains how we will treat your personal information that you provide to us. We review our Privacy Policy regularly to ensure it is up-to-date so we encourage you to review it from time to time on our websites. Alternatively, if you would like a copy sent to you then please request it by contacting our Privacy Officer (details below) and we will provide you a copy free of charge.

### 2. Open and transparent management

We take our obligations under the Act and the Australian Privacy Principles very seriously and has implemented practices, procedures and systems to ensure we comply with those laws. We are committed to maintaining the confidentiality and security of your personal information and managing it in an open and transparent way.

### 3. Collection of personal information

#### 3.1 Types of information collected

about our current and prospective customers, contractors, suppliers, agents, service providers, other business associates and the people associated with the businesses we deal with.

This information can include such things as your name, contact details (such as your phone number(s) and email and mailing addresses), financial information (including banking and credit card details), supporting documentation (including credit history details), device content, identification and transaction history information, and personal references.

#### 3.2 How we collect personal information

Our preference is to collect personal information from you directly and we will endeavour to do this unless it is unreasonable or impractical to do so. We collect personal information in a variety of ways including via online enquiries you submit on our websites, applications installed by you, over the telephone, through correspondence (whether by letter, fax or email), and on our forms when you enter into agreements and contracts with us.

We may also collect personal information from third parties including from credit reporting bodies, contractors, business partners and other entities.

#### 3.3 Cookies

"Cookies", are small files that are transferred to your computer's hard drive through your web browser and enable our sites to recognise your browser and remember certain information to assist in improving your online experience.

Cookies may collect and store personal information about you.

#### **4. Use or disclosure of personal information**

##### **4.1 Why do we collect, hold, use or disclose personal information?**

We collect, hold, use and disclose your information for the primary purpose of enabling us to carry out our business functions and activities which includes but is not limited to:

- (1) the provision of products or services to you (including the improvement of those products or services);
- (2) verifying your identity;
- (3) conducting checks and searches of your credit information to assess your credit rating from time to time;
- (4) communicating with you including via email, mail or telephone;
- (5) personalising and customising your experience;
- (6) managing and enhancing our products and services;
- (7) promoting and marketing our products and services including updating you with news and information about our existing and new products and services;
- (8) providing you with information about events, products or services that may interest you;
- (9) managing our relationship with you;
- (10) facilitating our internal business operations;
- (11) investigating any complaints made by you; or
- (12) as required or permitted by law.

##### **4.2 Disclosure to third parties**

From time to time we may disclose your personal information, including your credit information to third party entities, which may include credit reporting bodies or collection agencies for credit management purposes or other purposes as required by law.

#### **5. Direct marketing**

##### **5.1 What is direct marketing?**

For the purposes of this policy, "direct marketing" is the promotion and sale of goods and services directly to you including through emails, SMS, MMS, phone calls and the post. You consent to us using your personal information to send you – either directly or via one of our service providers – information, including promotional material about us and business partners from time to time in relation to any product or service they offer and you consent to being contacted by means of direct mail, email, SMS and MMS messaging and via telephone.

##### **5.2 No direct marketing**

We will not use or disclose your personal information for the purposes of direct marketing material if you have previously told us not to.

If at any time you do not want us (or one of our service providers) to send you direct marketing material or you wish to cancel a previous consent, then you can simply inform our Privacy Officer by contacting them (details below). We will effect the change in a reasonable time and without charge.

#### **6. Cross-border disclosure of personal information**

We may disclose your personal information to an overseas entity in circumstances where we:

- (1) have taken reasonable steps to ensure that they also treat it in accordance with the Act; or
- (2) reasonably believe that the overseas entity is subject to the same or similar laws to that found in the Act and there are ways that you can take action to enforce those overseas laws; or
- (3) expressly inform you of your option to consent to that disclosure and you then provide us with informed consent to do so; or

(4) are required or authorised by law.

## **7. Security of personal information**

### **7.1 Protection**

We will take such steps as are reasonable in the circumstances to protect your personal information that we hold from:

- (1) misuse, interference and loss; and
- (2) unauthorised access, modification or disclosure.

### **7.2 Destruction**

When we no longer need your personal information for a permitted purpose and we are not required to keep it to comply with any laws, we will take such steps as are reasonable in the circumstances to destroy your personal information or to ensure that the information is de-identified.

## **8. Complaints**

If you have a query or concern in relation to this privacy policy or wish to make a complaint regarding a breach of privacy you may do so by contacting our Privacy Officer (details below). All complaints will be investigated and dealt with promptly and confidentially.

## **9. Access to personal information**

If you wish to access your personal information that we hold, you may submit a written request to our Privacy Officer (details below). You will be required to provide adequate proof of identity before information will be disclosed to you. We may refuse a request in situations permitted by law.

We aim to provide you access to such information within 30 days of receipt of a valid request.

## **10. Correction of personal information**

### **10.1 Correction of personal information**

We will take reasonable steps to correct your personal information (at no charge) if we are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading. This extends to third parties that we have provided your personal information to unless it is impracticable or unlawful to do so.

### **10.2 Circumstances when we decline to make corrections**

In certain circumstances we may decline to correct your personal information. When this occurs we will provide you with a written notice that sets out:

- (1) the reasons for the refusal; and
- (2) the mechanisms available to complain about the refusal.

## **11. Privacy Officer Contact**

Privacy Officer  
Level 6, 464 St Kilda Rd  
MELBOURNE VIC 3004  
privacy@access4.com.au

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