

# Privacy Policy

## 1. Introduction

We respect the privacy of individuals' personal information and is committed to safe-guarding that information which it receives in connection with its business activities.

We will comply with the Privacy Act 1988 (Cth) and its amendments and the Australian Privacy Principles incorporated in that Act. You can find the full text of the Australian Privacy Principles on line at the Website of the Office of the Australian Information Commissioner:

<http://www.oaic.gov.au/privacy/privacy-act/the-privacy-act>

This policy outlines how We collect use and manage personal information about individuals and how individuals can make enquiries or complaints about our compliance with the Australian Privacy Principles and about any personal information we hold on file about them.

We may update or change this policy from time to time to take account of new amended laws, new technology or changes in our operations. If we do so we will publish the updated policy on our Website. All personal information held by us will be governed by our most recent updated policy.

## 2. Personal Information

Personal information is defined by the Privacy Act as:

"Information or an opinion about an identified individual or an individual who is reasonably identifiable;

- (a) Whether the information or opinion is true or not; and
- (b) Whether the information or opinion is recorded in a material form or not."

Generally the personal information that we collect about individuals includes names, dates of birth, contact details (including telephone numbers and addresses), the organisation you work for and your role and financial information including information collected from any credit reporting agency.

## 3. Purpose of Collection

We collect personal information that is reasonably necessary to conduct our business activities. Generally personal information is used for dealing with your contractual obligations to us, your requests and enquiries and our sales and marketing activities.

We may collect and hold personal information so that we can:

- Identify you and conduct appropriate checks including credit checks.
- Understand your requirements and provide you with a product or service.

- Set-up, administer and manage our products and services and systems including management and administration of accounts.
- Assess, investigate, process any claims arising out of the sale of any goods or the provision of any services.
- Recruit, manage, train and develop our employees and representatives.
- Manage any complaint or dispute and to report to dispute resolution authorities.
- Get a better understanding of you, your needs and how you interact with us so we can engage in product and service research development and business strategy.

By communicating with us you will be providing us with certain personal information which may include your name and contact details. This information is collected by us for the purpose of dealing with your request. We may not be able to deal with your request without collecting this information from you.

We may also collect credit information about you from a third party such as a credit reporting agency in accord with our Credit Reporting Privacy Policy.

## 4. Use of Personal Information

We will generally use, collect, hold or disclose personal information about you for the purpose for which it was collected including:

- To provide you with products and services and to send communications requested by you.
- To obtain credit history information about customers and potential customers.
- To tailor our communications to you.
- To send information about future promotions, news, services, products or events.
- To conduct business processing functions.
- For our internal administrative marketing and planning requirements.
- To compile and report statistics using de-identified information.
- For purposes that are expressly permitted under any agreement with you.

We may disclose your personal information to:

- Our employees, related corporations, contractors or service providers for the purpose of operating our website, conducting our business activities, fulfilling requests by you or to provide products and services to you.

- Suppliers and third parties with whom we have commercial relationships for business marketing and related purposes.
- Other organisations for authorised purposes with your consent.
- To debt collectors when any payment is overdue.

We may share personal information with related corporations or with contractors performing services for us. We will use reasonable endeavours so that those organisations are required to comply with the Australian Privacy Principles.

## 5. Website Information

To help meet the needs and requirements of our website users and to secure and develop on-line services we may collect information via our website by various means including system log-files and cookies. Cookies are unique identification numbers that are placed on the browser of our website users. The cookies do not identify users personally but are linked back to a database record about them.

When a user visits our website a cookie may be placed on their computer device. If a user has visited our website before the cookie may be read each time the user revisits the website. We do not use this technology to access any other personal information of a user in our records and a user cannot be personally identified from a cookie.

We may use cookies to track use of our website and to compile statistics on visits to the website in an aggregated form. We may use log files to review the security and performance of our Website. Cookies and log-files may contain information including:

- The user name that you have used to access a secure area of our website which requires authentication by you.
- The address of a user's server.
- A user's top level domain.
- The date and time of a user's visit.
- The pages of our website a user accessed.
- The search engine a user used.
- The type of browser that was used.

## 6. Management of Personal Information

The internet is an unsecure medium and users should be aware that there are inherent risks in transmitting information across the internet. Unencrypted information submitted via email or web forms may be at risk of being intercepted read or modified.

Personal information may be held on internal or external systems including public and private server environments. We will take reasonable steps to protect the personal information we hold from misuse and loss, interference and from unauthorised access, modification or disclosure. We may also store your personal information in hard copy.

When we have no further need to use your personal information we will securely de-identify or dispose of your personal information.

## 7. Email Security

Any email message you send may be automatically examined and filtered for unacceptable content which may result in your email or attachments being held for review. Our information technology administrators may have access to any email messages and/or attachments to authorise the content for security purposes only.

## 8. Correction of Information

You may request access to your personal information that we hold about you. We will provide you with access to your personal information in accord with the Privacy Act and the Australian Privacy Principles and we may not grant you access to personal information that we hold where the Australian Privacy Principles allow us to do so. If you are refused access to your personal information we will provide you with reasons for the refusal.

We will take reasonable steps so that the personal information that we collect use or disclose is accurate, complete and up-to-date. If you believe that the personal information we hold about you is inaccurate or out-of-date please let us know and request us to amend it. We will consider your request and if we are satisfied with your request we will take reasonable steps to correct your personal information. If we do not agree that there are grounds for amendment then we will follow the procedures incorporated in the Australian Privacy Principles.

Any request for access to your personal information must be made in writing. A reasonable fee may be charged for the cost of verifying the application and location, retrieving and copying the personal information requested.

## 9. Further Information

If you have any question in relation to our personal information handling procedures or you have any complaint regarding the treatment of your privacy or the Australian Privacy Principles please contact:

Privacy Compliance Officer  
Civfast  
Level 1  
322 Glenferrie Road  
MALVERN VIC 3144

We may need you to provide more information about any question you may pose. If your concern is genuine we will investigate the issue and endeavour to provide you with a written response within 28 days of receipt of your written query. In some circumstances we may not be able to provide you with a written response within the timeframe specified. If that is the case we will contact you and explain the reason for the delay and provide you with a new timeframe for a written response.

If you are not satisfied with our response please notify the Privacy Compliance Officer in writing. We can escalate your query and review the response that you have been given. You may also direct your issue to the Office of the Australian Information Commissioner at:

[www.oaic.gov.au/privacy/privacy-complaints](http://www.oaic.gov.au/privacy/privacy-complaints)

You are entitled to make an anonymous complaint or enquiry in relation to our Privacy Policy, the Australian Privacy Principles or your privacy rights. However we may require you to identify yourself if required by law or if it is impracticable for us to deal with your enquiry without such information.