

About this privacy policy

At AUSREO Pty Limited ACN 094 555 192 (**AUSREO, we, our, us**), we value and respect your privacy and take the protection of your personal information seriously.

We have prepared this privacy and credit reporting policy (**Privacy Policy**) to inform you of the personal information that AUSREO and its related companies collect and hold about you, as well as other data that we collect and hold, and how we use that information. It also incorporates our credit reporting policy, which lets you know how we use any credit-related information we might collect.

Personal information generally means any information about an individual from which that person can be identified. Credit-related information generally means information about the credit worthiness about an individual. In this Privacy Policy we refer to personal information and credit-related information as information.

This Privacy Policy also provides information about how you may access your information, seek correction of your information and make complaints if you think we have breached any privacy laws and how we deal with such complaints. This Privacy Policy may change from time to time and it is therefore important that you review it regularly. Any change to this Privacy Policy will become effective when we publish the revised Privacy Policy on our website at www.ausreo.com.au.

What information do we collect and handle?

The type of information we collect and handle varies for different parts of our business operations and includes personal information and credit-related information about our customers and distributors and personal information about our suppliers, contractors, job applicants and visitors to our sites.

Customers and distributors

The information that we collect about current and prospective customers and distributors and individuals working for or associated with them includes: contact information (including name, phone number, postal address, and email address); information about owners, directors, partners of a partnership and other individuals of our business customers and distributors (including guarantors) relevant to our commercial credit applications (including name, date of birth, driver's licence number, other identify information and credit-related information (for more details please refer to the section on credit reporting below)); bank details and other payment related information (where you pay from an account related to an individual); delivery information; feedback from customer satisfaction surveys; and other records of your communications with us.

Suppliers and contractors

The personal information that we collect about current and prospective suppliers and contractors includes: contact information including contact information about owners, directors, officers, partners of a partnership and other individuals working for our suppliers and contractors (including name, phone number, postal address and email address); insurance details if you are a contractor; and where you are a sole trader, account details where you request payment to an account related to an individual.

Human Resources

We collect personal information about job applicants, employees and contractors for recruitment and managing human resources, including information concerning qualifications, skills, experience, character, screening checks (including reference, background (including criminal record checks), directorship, financial probity, identity, eligibility to work, and vocational suitability), employment history, training, contracts and terms and conditions, staff benefits, emergency contact details, performance, conduct, use of our IT systems, payroll matters, leave and taxation, banking or superannuation affairs.

Security and health and safety

We collect personal information, typically contact information, for visitors to our site, insurance details of contractors, and images and audio for surveillance technology such as closed circuit television for security purposes. If you are a contractor, we also collect your vehicle registration details and licence details, when you come on site. We also collect health information when dealing with incidents affecting health and safety on site, our employees and contractors, or in connection with our products or services.

Community engagement

We are supporters of various community organisations and charities. If you choose to donate through our website, we collect personal information from you, such as your name and your donation, where you choose not to donate anonymously.

How do we collect your information?

We collect personal information from you wherever it is reasonable and practical to do so. In some instances, we collect information about you from third parties. We may collect personal information from you via:

- information you provide to us directly, for example when you complete our commercial credit application form or communicate or interact with us by telephone, email, online (including through our website) or in person;
- your response to any surveys or marketing materials we send out;
- if you are a job applicant, when you register on our website;
- information from third parties, including:
 - if you are a current or prospective customer, or distributor applying for or receiving credit from us (or you are an owner, director, partner or other individual connected with such customer or distributor) credit reporting bodies, trade credit insurers, other creditor providers, other suppliers to you as trade references and your landlord;
 - suppliers and other third parties who provide products and services to us; and
 - publicly available sources.

If you call our general contact numbers, we may record telephone conversations for quality and training purposes, unless you request us not to do so.

You must only provide us with the information of someone else if you have that person's consent to do so.

Why do we collect your personal information?

We collect, hold, use and disclose information, including your personal information, for our business purposes including:

where you are a customer or distributor or work for are associated with a customer or distributor:

- verifying your identity and information;
- to assess credit-worthiness and for other credit-related purposes described in the credit reporting policy section below;
- understanding your requirements in order to provide you with our products and services;
- to set up, administer, and manage our products and services;
- to respond to your comments or questions, including advice on any of our products or services;

- to fulfil requests for products and services and information for internal operations;
- to assess and investigate any complaints made about our products or services;
- for product and service research and development, and business strategy;
- for marketing purposes;

where you are a supplier or contractor:

- to manage the purchase of goods and services;

where you are a job applicant, employee or contractor:

- to manage our human resources;

and more generally:

- to manage, train and develop our employees, contractors, and representatives;
- to manage complaints and disputes, and report to dispute resolution bodies;
- to manage security, health and safety;
- to manage our community programs; and
- to comply with applicable laws and regulations.

Who might we disclose your personal information to?

We may disclose information, including your personal information, to various third parties for any of the purposes identified above.

If you are a customer or distributor or associated with a customer or distributor, applying or receiving credit from us, we may disclose your credit-related information to credit reporting bodies, trade credit insurers and other credit providers for identity checking and credit-related purposes such as credit-worthiness, credit rating, and default listing. We may also disclose credit-related information to a guarantor or proposed guarantor. We disclose information to trade credit insurer, National Credit Insurance (Brokers) Pty Ltd. We or they may disclose credit-related information to the following credit reporting body:

Equifax Pty Ltd
 GPO Box 964, North Sydney, NSW, 2059
 Ph: 13 83 32,
<https://www.equifax.com.au/privacy>

Other types of third parties with whom we exchange information include:

- our distributors in connection with the provision of our products and services;
- various third party suppliers, which provide materials and services and support for our business;
- to AUSREO related companies;
- our service providers, including providers of campaign, promotion, accounting, auditing, legal, banking, payment, debt collection, delivery, data processing, data analysis, document management, research, investigation, technology services and training providers;
- to a third party organisation in the event we sell or transfer all or a portion of our business or assets;
- your organisation and representatives; and
- government agencies for reporting and compliance purposes.

We may disclose your information to comply with our legal obligations, respond to complaints and claims, and investigate and protect ourselves and third parties against any activity that we reasonably suspect to be fraudulent. We may also disclose your information to law enforcement agencies, regulatory authorities and government agencies and their service providers in connection with their investigations, screening or other functions.

What if we can't collect your information?

If you do not provide us with the information we need, some or all of the following may occur:

- if you are a customer or distributor or associated with a customer or distributor, we may not be able to process an application for credit, provide you or your related entity with credit or provide you or your related entity with our products and services;
- if you are a contractor or supplier, we may not be able to engage you for your goods or services;
- if you are a job applicant, we may not be able to consider your job application;
- if you are a visitor to one of our sites, we may not allow you on to our site; and
- we may not be able to respond to your requests for information.

Direct marketing communications

From time to time we may send you direct marketing communications regarding our products and services.

We may contact you by electronic messages (e.g. email), online (e.g. through our website), by mail and by other means, unless you opt out or we are subject to legal restrictions. You may opt out of receiving electronic messages from us at any time by contacting our Privacy Officer via the contact details at the bottom of this Privacy Policy or by using the opt out mechanism included in our marketing messages.

Credit Reporting

We may collect, use and disclose credit-related information about you as an individual:

- if you apply to us for credit or we provide credit to you (for example if you are a sole trader); or
- if you deal with us in connection with credit provided to, or a credit application made by, another customer or distributor (for example if you are an owner or director in a company obtaining credit, or a guarantor or proposed guarantor for that credit).

What credit-related information do we collect and hold?

The types of credit-related information we may collect and hold about you include:

- identification information including name, address, driver's licence, date of birth and contact details;
- details about your credit history with us (including any repayments that you have missed, late payments that you have made and information about whether you have met your obligations to repay your credit or satisfy your guarantee);
- information about any credit provided to you by credit providers (including financial institutions, utilities or telecommunications providers);
- details of any bankruptcy or insolvency applications that relate to you;
- detail of any credit-related court proceedings that relate to you;

- credit reports or credit assessment scores that have been provided to us by a credit reporting body; and
- internal credit assessment checks and scores that we derive from credit reporting information disclosed to us by a credit reporting body.

Our use and disclosure of your credit-related information

We may collect, hold use or disclose your credit-related information for purposes such as:

- to assess any application that you make to us for a credit (or which is made by your related company, such as company of which you are a director);
- where you have offered to guarantee credit, to assess whether to accept your guarantee and the risk of you being unable to meet your obligations;
- disclosing your credit-related information to any of our related companies that are also are considering whether to provide credit to you (or to your related company or other entity);
- to conduct appropriate checks for credit-worthiness including disclosing credit information to credit reporting bodies and then receiving from credit reporting bodies credit reporting information about you (such as a credit report);
- to administer and manage the products and services we provide to you, including to collect payments that are owed to us in relation to any credit that we have provided to you or your related entity and dealing with a serious credit infringement;
- disclosing your credit-related information to a third party that you or we ask to act as a guarantor of any credit provided to you;
- to disclose credit-related information to other credit providers, which provide or are considering providing credit to you or to your related entity;
- to disclose to a credit reporting body if you fail to meet your payment obligations including, where relevant, in relation to consumer credit, or if you commit a serious credit infringement in relation to consumer credit;
- to deal with access requests, complaints or regulatory matters relating to credit or credit reporting; and
- as required or authorised by law or otherwise as permitted under credit reporting laws.

Please refer to other sections of our Privacy Policy, which set out how we collect and hold your credit-related information, how you may access and seek correction of your credit-related information and how you may make complaints and how we deal with them.

Visitors to our website and use of social media

To help provide services through our website or understand more about visitors to our website, we collect certain information including from your browser. This information includes statistical information and includes the IP address, browser type, language and access times. Our website also uses cookies to track pages visited and information accessed within our website. This information is for statistical reference, site analysis and to remember your details and preferences when you return to that website.

In many cases, the tools used on our website record information in a way that does not identify you as an individual. In other cases, information collected through our website may be personal information, for example when you register for job alerts or apply for a position through our website, in which case this Privacy Policy will apply. We may also collect personal information through our social media presence, such as Facebook, Instagram and LinkedIn, or when you post comments or communicate through these social media platforms.

Our website may also use third party website tools from time to time, for example data analytics and online survey tools. Below we summarise why we use different types of cookies:

- **Necessary cookies:** are those that are essential to run our website or enable you to receive a service that you have requested.
- **Performance cookies:** are those that collect information about how visitors use and interact with our website so that we can improve it.
- **Functionality cookies:** are those that remember choices you make. Without these cookies you may find that certain features are less convenient and reliable.
- **Marketing cookies:** are those that help us deliver advertising that is more relevant to you and your interests. They include third-party cookies placed by our partners and other advertisers who share cookie data with us.

Your web browser can be configured to reject cookies. If you set up your web browser to reject cookies certain functions of our website may become unavailable to you.

Data Security

We store information in both physical and electronic form. We have put in place appropriate security measures to protect your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Depending on the circumstances, these measures may include staff authentication, access controls, encryption, records management protocols and secure premises. We have put in place procedures to deal with personal information breaches and will notify you and any applicable regulator of a breach where we are legally required to do so.

How can you access and correct your information?

The accuracy of the information we hold and use is important to us. We take reasonable steps to ensure that the information we handle is accurate, complete and up-to-date. To help us keep your information accurate, please let us know if there are any errors or changes in your information.

You can request access to the information we hold about you at any time. To request access to any information that we may hold about you, please contact our Privacy Officer using the contact details at the bottom of this Privacy Policy. In most cases, we can help you promptly and informally with these requests. In other cases, we may need to verify your identity and ask you to make your request in writing.

From time to time, we may need to reject your request to access or correct the information we hold about you, if we believe it to be necessary and to the extent allowed by law. We will provide our reasons if we deny your request for access to, or correction of, your information. Where we decide not to make a requested correction to your information and you disagree, you may ask us to make a note of your requested correction with the information we hold about you. We won't charge you for simply making a request to access or correct personal information. However, we may charge reasonable costs for carrying out your request.

You may also contact our Privacy Officer if you wish to obtain further information regarding our privacy and credit reporting practices and the way we handle your information.

Information retention

We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy and in each case in accordance with applicable legal and regulatory requirements in respect of permitted or required retention periods and limitation periods for taking legal action.

How can you make a privacy or credit-related information complaint?

We take your privacy concerns seriously. If you have a complaint regarding our handling of your information or concerning our privacy and credit-related information practices, you may file a complaint with our Privacy Officer using the contact details set out at the bottom of this Privacy Policy. Our Privacy Officer will confirm receipt of your complaint. If our Privacy Officer believes an investigation is necessary, we will open an investigation into your complaint. Our Privacy Officer may need to contact you to request further details of your complaint. If an investigation has been opened following a complaint made by you, our Privacy Officer will contact you with the result of that complaint as soon as possible.

In the unlikely circumstances we are unable to resolve your complaint to your satisfaction, you may be able to contact Office of the Australian Information Commissioner, at www.oaic.gov.au.

Application of legal requirements

We are subject to the Privacy Act 1998 and a range of privacy laws. Nothing in this Privacy Policy is intended to limit our obligations or permitted handling of information under those laws. For example, under the Privacy Act, we may rely on certain exemptions including in relation to employee records.

Some of our collection and handling of personal information is also required or authorised by other laws, for example the Fair Work Act, Superannuation Guarantee (Administration) Act, Income Tax Assessment Act and other tax laws, Corporations Act, work health and safety laws, and workers compensation laws.

Policy reviews

From time to time, we may review and update this Privacy Policy. All information will be collected and handled by us in accordance with the most recently updated policy.

This Privacy Policy was last updated on 18 August 2020.

How to contact us

If you have any questions or comments about this Privacy Policy or our privacy related practices or if you would like to request access to or correction of any information we may hold about you, please contact our Privacy Officer:

Email: privacy@ausreo.com.au

Phone: +61 2 9765 2100

Address: 133 - 139 Newton Road, Wetherill Park NSW 2164