

PORTERS

PRIVACY POLICY

1. INTRODUCTION

- 1.1 In the course of our business in Australia (Charles Porter and Sons Proprietary Limited ACN 009 659 232 trading as Porters), 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 procedures for identifying and managing privacy risks;
 - (b) implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure;
 - (c) providing staff with training on privacy issues;
 - (d) implementing mechanisms to ensure any agents or contractors who deal with us comply with the APPs;
 - (e) implementing procedures for identifying and reporting privacy breaches and for receiving and responding to complaints;
 - (f) appointing a privacy officer within the business to monitor privacy compliance; and
 - (g) allowing individuals the option of not identifying themselves, or using a pseudonym, when dealing with us in particular circumstances.
- 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 dealing with us (for example, making a general enquiry with us). However, if you would like to order a product or service from us, we will need your personal information in most instances in order to supply you with the product or service.

3. WHAT KINDS OF INFORMATION DO WE COLLECT AND HOLD?

Personal information

- 3.1 We may collect and hold personal information about you, which may include:
- (a) sensitive information (see below);
 - (b) contact information;
 - (c) financial information;
 - (d) date and place of birth;
 - (e) employment arrangements and history;
 - (f) tax returns and tax file numbers;
 - (g) insurance information;
 - (h) credit information;
 - (i) banking details; and
 - (j) any other personal information required to provide the product or service to you.

Sensitive information

- 3.2 'Sensitive information' is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.
- 3.3 The sensitive information we might collect and hold about you may include any of the following:
- (a) membership of professional or trade associations;
 - (b) membership of trade unions; and
 - (c) health information.
- 3.4 We will not collect sensitive information without the individual's consent to whom the information relates unless permitted under the Privacy Act.

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) through marketing and business development events;
 - (b) through our rewards program or trade card program;
 - (c) from forms such as our customer feedback forms;
 - (d) from third party providers and suppliers;
 - (e) through competitions; and
 - (f) from any other consultants we engage from time to time.

5. HOW DO WE HOLD PERSONAL INFORMATION?

- 5.1 Our usual approach to holding personal information includes:
- (a) physically at our premises (securely); and
 - (b) electronically:
 - (i) on our secure online server;
 - (ii) in a cloud (Microsoft 365); and
 - (iii) by a third party data backup provider (EMC Avamar).
- 5.2 We secure the personal information we hold in numerous ways, including:
- (a) ensuring authorised access only to areas that contain personal information;
 - (b) using secure servers to store personal information;

- (c) using unique usernames, passwords and other protections on systems that can access personal information; and
- (d) holding certain sensitive documents securely and destroying them regularly.

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 for which information is collected is generally to provide the products and services requested for you or your business. For example, this might include:
- (a) supplying you with building supplies;
 - (b) supplying you with hardware and lifestyle supplies;
 - (c) supplying you with plumbing supplies;
 - (d) providing you with glass and fabrication services;
 - (e) supplying or providing you with truss and frame products or services; and
 - (f) providing with you any other products or services connected to our business as a full scale building supply and hardware business.
- 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 which are within your reasonable expectations and which are related to the primary purpose of collection.
- 6.4 For example, we may collect and use your personal information:
- (a) to keep record of transactions to assist in future enquiries and enhance our customer relationship with you;
 - (b) for delivery purposes;
 - (c) to send you special offers and promotional material; and
 - (d) to invite you to events.
- 6.5 We may disclose personal information to:
- (a) our suppliers and partners;
 - (b) government bodies (if necessary to comply with our blue and white card requirements, or to comply with any BSA licensing requirements);
 - (c) business support service providers (for example our software suppliers, debt collection agencies, data backup provider, law and accounting firms or other consultants);
 - (d) any other third party we deem necessary in connection with providing you with the products or services.
- 6.6 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 do not disclose personal information outside of Australia apart from any information stored through our cloud provider (Microsoft 365). The jurisdictions in which this provider is primarily located are Singapore and Hong Kong.
- 7.2 We take reasonable steps to ensure we are satisfied that the receiving party provides commitments to privacy and confidentiality which are at least equal to the Australian Privacy Principles or the recipient is subject to privacy protection laws that offer at least the same level of protection as required under the Privacy Act in Australia.

8. HOW DO WE MANAGE YOUR CREDIT INFORMATION?

What kinds of credit information may we collect?

- 8.1 In the course of providing products or services 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 have been 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. Veda). The kinds of information we collect may include any of those kinds of information outlined in sections 3.1, 3.3 and 8.1 of this policy.
- 8.3 We may also collect personal information which may affect your credit worthiness from other credit providers (for example, the Building Industry Credit Bureau or through our insurance broker, National Credit Insurance (Brokers) Pty Ltd) that collect that information from credit reporting bodies. The kinds of personal information we collect may include any of those kinds of personal information outlined in sections 3.1 and 3.3 of this policy.

How and when do we collect credit information?

- 8.4 In most cases, we will only collect credit information about you if you disclose it to us.
- 8.5 Other sources we may collect credit information from include:
- (a) credit reporting bodies (Veda);
 - (b) the Building Industry Credit Bureau;
 - (c) our insurance broker, National Credit Insurance (Brokers) Pty Ltd; and
 - (d) suppliers and other creditors.

How do we store and hold the credit information?

- 8.6 We store and hold credit information in the same manner as outlined in section 5 of this policy.

Why do we collect the credit information?

- 8.7 Our usual purpose for collecting, holding, using and disclosing credit information about you is to enable us to provide you with the product or service, or to assess your credit eligibility.
- 8.8 We may also collect the credit information to assist in processing payments.

Overseas disclosure of the credit information

- 8.9 Apart from our cloud provider located primarily in Singapore and Hong Kong, we will not disclose your credit information to entities without an Australian link unless you expressly request or authorise us to.

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

- 8.10 You can access and correct your credit information, or complain if you believe there has been 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 in accordance with the Privacy Act.
- 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 believe there has been a breach of your privacy, then you can make a complaint by using the following process:
- (a) The complaint must be firstly made to us in writing, using the contact details in this section. We will require 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: Gavan Porter
Postal Address: PO Box 34, Mackay, Queensland, 4740
Telephone number: (07) 4967 3314
Email address: mail@cporter.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 March 2014. If you have any comments on the policy, please contact the privacy officer with the contact details in section 9 of this policy.