

# PRIVACY POLICY

## **Protecting Your Privacy**

A new Federal Privacy framework regulating the way private sector organisations handle personal information was introduced on 21 December 2001, by amending the Privacy Act 1988. The amendment implements the National Privacy Principles to regulate the way personal information is collected, stored and used.

This privacy policy shows how Shamrock Poly Pty Ltd complies with National Privacy Principles in protecting your personal information.

## **Collection of Personal Information**

Personal information is information or opinion that allows others to identify you. It may include your name, age, gender, contact details, as well as our health and financial details.

We will collect most personal information directly from you. There may also be occasions when we need to source personal information about you from a third party. (See below: Exchange of personal information with Third Parties).

## **Sensitive Information**

We will only collect sensitive information with your consent, unless we are required to collect that information by law.

Sensitive information is legally defined as any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information.

Sensitive information will only be collected for the purpose of establishing and maintaining our relationship with you and/or your company, and we will always explain the purpose for collecting it.

## **How we use your Personal Information**

The types of personal information which we may collect and hold for our activities include, without limitation, your name, address, phone number, age, your position at your company, financial information relating to your credit status, and relation to performance under any agreement with Shamrock Poly Pty Ltd.

The primary purpose for Shamrock Poly Pty Ltd collecting your personal information is to allow Shamrock Poly Pty Ltd to communicate and maintain a working and successful relationship with your company as our client/supplier (whichever is applicable in your case).

If you do not provide this information, we may not be able to deal with you, or provide you or your company with our products and services.

Shamrock Poly Pty Ltd may also use or disclose your personal information for purposes such as:

- Helping us to deliver and identify products and services that may interest you;
- Answering any queries you may have;
- Considering you or your company's application to become our client or supplier;
- Addressing any feedback or complaints you or your company, or any end user of Shamrock Poly Pty Ltd products and services may have;
- Maintaining our relationship with you;
- Conducting market or customer service research;
- Where you or your company are offering Shamrock Poly Pty Ltd the supply of products or services, inquiring about the standard, quality and suitability of the products or services offered;
- Performing our internal administration and operations including: accounting, risk management, record keeping, archiving, systems development and testing, credit scoring and staff training;
- Complying with legislative and regulatory requirements;
- Developing, establishing and administering business alliances and other arrangements with other organisations in relation to the promotion, administration and use of our respective products and services;
- Developing, improving and marketing our products and services; and
- Any purpose for which the information was directly requested and directly related purposes.

#### **Consent**

Personal information is usually used or disclosed only after obtaining your consent. Your consent can be expressed or implied.

If you continue dealing with Shamrock Poly Pty Ltd or using Shamrock Poly Pty Ltd services after being provided with this privacy policy, you are deemed to consent to Shamrock Poly Pty Ltd collecting and using your personal information in accordance with this Privacy Policy.

#### **Exchange of personal Information with Third Parties**

Shamrock Poly Pty Ltd may disclose your personal information to:

- Any entity to which we are required or authorised by or under law to disclose such information (for example, Federal or State law enforcement agencies and investigation agencies, courts and various Federal and State organisations);

- Others that you have been informed at the time any personal information is collected from you;
- Our business associates and others for purposes directly related to the purpose for which the personal was collected; and
- Others, with your consent (expressed or implied) for example where you have listed us as a credit reference in a credit application.

We may (where applicable) also obtain personal information from some or all of the above, as well as your referees and previous employers, to enable us to assess your suitability as applicant for credit with us, or supplier or services to us. When we obtain personal information from third parties whom we are referred to by you, we will assume and you will ensure that you have made the third party aware of the referral of the persons and purposes.

### **Storage and Security of Personal Information**

Your information may be stored in hard copy form or electronically in our systems. The security level applicable your information will depend on whether you fall within the supplier or client category.

Our security measures consist of the use of security tags for all visitors and physical security being locks to the premises when premises are unattended.

In the case where you are a supplier or supplier representative, there are no computer safeguards implemented over supplier information stored electronically.

In the case where you are a client or client representative, our safeguards include, but are not limited to:

- Restricting access to our computer systems and physical records to authorised persons and preventing users from accessing information they have no need to access;
- Requiring employees to use unique passwords to gain access to systems.

Appropriate arrangements are implemented to ensure that access to computerised records is granted only to staff requiring such access in the course of their duties. Computer access passwords are intended as security devices and staff are not permitted to disclose their passwords to others.

Please be aware that personal information provided by email may not be secure. If you have any concerns regarding the security of your personal information, please provide it in an alternate form.

Shamrock Poly Pty Ltd uses secure methods to destroy your personal information. We will retain personal information while it is required for any of our functions, or for any lawful purpose.

### **Accessing your Personal Information**

You can request us in writing, to provide you with access to the personal information we hold about you. We will respond to your access request within 14 days of receiving your request. You may need to pay an access fee of \$50, if access is granted.

If particular circumstances apply, the Privacy Act permits Shamrock Poly Pty Ltd to deny your request or limit the access we provide. If your access is denied or limited, you will be informed of the reason.

If you wish to access information held by Shamrock Poly Pty Ltd, you will need to write to the Privacy Officer at the address listed below.

### **Marketing**

As part of our service to you, Shamrock Poly Pty Ltd may use personal information collected to identify products and services that may benefit you or our company. We may contact you periodically to inform you about new or existing products or services. However, you may contact us at any time if you do not want to receive marketing information from Shamrock Poly Pty Ltd.

### **Up-to-date Personal Information**

Shamrock Poly Pty Ltd will take all reasonable steps to ensure that your personal information is accurate, complete and up-to-date at the time of collecting, using or disclosing the information.

Should you inform us that any of the current information that we hold about you is inaccurate, incomplete or outdated, we will promptly update that information.

### **Change to this Policy**

From time to time, Shamrock Poly Pty Ltd may amend this privacy policy. We will display the amended version on our premises. You may also request a copy of our most up-to-date Privacy Policy by writing to our Privacy Officer.

### **Contacting Us**

If you have any questions, complaints or would like further information about our privacy and information handling practices, please contact us by writing to:

Nick Lobb  
Privacy Officer  
P.O. Box 5039  
HALLAM VIC 3803