



## PRIVACY POLICY

### Summary

College Investments Pty Ltd (ACN 008 977 759) as trustee for the Neil Staines Family Investment Trust and Woody Island Pty Ltd (ACN 165 377 499) together trading as Staines Esperance (ABN 81 437 131 820) of 64 Norseman Road, Esperance, Western Australia (**Staines, us, we**) respects and is committed to protecting your privacy.

The purpose of this Privacy Policy is to explain:

- the application of this Privacy Policy
- the kind of information we collect about you, how and why we collect it, and how we use it
- how we may disclose that information
- how we store that information
- how you can access the information we hold about you
- the protection of your personal information
- when we may use your information to contact you
- our use of cookies to collect information, and how you can control or delete these cookies.

### Application of this Privacy Policy

This policy informs you of your rights to privacy and describes how we comply with our privacy requirements as set out in the *Privacy Act 1988* (Cth) (**Privacy Act**), the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth) and the Privacy (Credit Reporting) Code 2014 (**Privacy Code**).

This policy deals with how we collect, manage, store and disclose your “personal information”. Certain parts of this Privacy Policy also apply to “credit related information” and “sensitive information”. These terms are discussed below.

### What is personal information, sensitive information and credit related information

We collect personal information in the course of our business dealings with you. The term “personal information” is defined by the Privacy Act. Personal information is information or an opinion that can be used to identify you. This might include personal details like your name, address, date of birth, other contact information like your email address and phone number and financial information like your credit card number or bank details.

“Sensitive information” is a type of personal information. Sensitive information can include information like your racial or ethnic origin, health, political opinions, membership of a political association, professional or trade association or trade union and criminal record.

Sometimes, the personal information we collect from you may constitute credit related personal information. “Credit related personal information” is defined by the Privacy Code. Credit related



personal information can include information about your identity, repayment history information, whether you have overdue payments, whether you have ever been the subject of credit related court proceedings or insolvency proceedings and whether, in the opinion of a credit provider, you have committed a serious credit infringement.

This policy applies to personal information, sensitive information and credit related information collected by us, whether we have asked for the information or not.

## **The kind of personal information we collect and hold**

The personal information and credit related information we collect and hold will depend on our dealings with you.

The different kinds of personal information we collect and hold include:

- names;
- contact details, including address, phone number and email address;
- signatures;
- dates of birth;
- employment details;
- bank account details;
- financial details;
- tax file number;
- opinions about our services, products and staff; and
- any information sent to us through correspondence.

The different kinds of credit related personal information we collect and hold include:

- the personal information listed above;
- applications for commercial credit, the type and amount of that credit and the fact that we have accessed consumer credit information to assess a credit application;
- that we and other credit providers have provided credit to an individual, payments owed to us in connection with credit provided to an individual;
- whether in our opinion, or the opinion of another credit provider, an individual has committed a serious credit infringement;
- information about court proceedings, personal insolvency information and other credit related publicly available information;
- whether an individual has entered into an arrangement with us or another credit provider in connection with credit provided to the individual;
- scores, ratings, summaries, evaluations and other information relating to an individual's credit worthiness; and



- certain administrative information relating to credit, such as account and customer numbers.

Generally, we do not collect sensitive information. If we think any sensitive information is reasonably necessary to allow us perform our functions or activities we will ask for your consent to collect this information.

For ease of understanding and reading this policy we will refer to personal information and credit related personal information together as “personal information”.

## **Why we collect personal information**

We collect personal information for a number of reasons including:

- to communicate with you;
- to deliver products or services to you;
- to assess a credit application by you;
- to assess your creditworthiness;
- to decide whether to withdraw credit facilities;
- to notify other credit providers of a default by you;
- to exchange information with other credit providers as to the status of your credit account, if you are in default with other credit providers;
- to better understand your requirements and preferences and improve our products and services;
- to recruit employees and engage contractors and subcontractors;
- to perform other administrative functions, like the daily operation of your credit facility;
- to comply with legal requirements; and
- for purposes directly related to any of the above.

## **How we collect personal information**

We will collect personal information from you in a number of ways. We will collect personal information when you place an order, provide feedback to us, apply for or engage in employment or otherwise deal with us.

We will collect information directly from you. However, in certain circumstances we will also collect personal information from third parties, for example if you are dealing with us through this third party, for example if you are referred to us through a third party. We might also obtain information from publicly available sources like government websites.

If you have applied for credit with us, we will collect and share credit related personal information from credit reporting bodies and other credit providers. We will only do this with your consent.



If you do not wish to provide personal information to us you have the option of remaining anonymous or using a pseudonym. However, in certain situations we may be unable to provide you with a product or service if you do not provide us with your personal information. If you have concerns about your rights to anonymity or the use of a pseudonym, you can contact our Privacy Officer on a no-names and confidential basis.

## **How we store personal information**

We store personal information digitally on our computer systems and computer servers. These systems and servers are used by us and are located in our office but may be hosted by third parties.

We also hold personal information in hard copy. Hard copies are stored in our office.

Only authorised personnel have access to our server and computer systems and our hard copy files. All of our server and computer systems are protected by password.

We regularly update our anti-virus software in order to protect our computer systems.

## **How we disclose personal information**

We may disclose your personal information to third parties for the following purposes:

- to provide the products or services you wish to use;
- to customise and promote our services which may be of interest to you;
- to provide technical support to you to use products;
- if permitted or required by law; or
- otherwise with your consent.

As part of providing services to you, we will sometimes need to disclose your personal information to third parties who perform part of our services. This includes third party contractors, who we contract with to provide services to you, like our delivery agents. We may also need to disclose your personal information to our external service providers like delivery companies, IT service providers and third party data storage providers and to our advisors, like our accountants and lawyers.

We will take reasonable and practicable steps to ensure third parties we deal with take steps to protect your privacy. All of our employees are required to maintain the confidentiality of any personal information held by us.

We will never sell your personal information to anyone.

It is unlikely that we will ever disclose your information to anyone overseas, except if we are required to do this by law.

## **Applying for and employment with Staines**

If you submit an application or register interest for employment with us, we will collect personal information from you. If your application for employment with us is unsuccessful, we may retain this personal information to assess your suitability for another role with us. If you do not want us to retain personal information about you, please contact our Privacy Officer.



## **Destroying personal information**

We will destroy, or take steps to de-identify, personal information when this is no longer required by us.

## **Access and correction of personal information**

We will take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, up-to-date and complete. We will also take reasonable steps to protect personal information that we hold from misuse, interference, loss, unauthorised access, modification or disclosure.

You have the right to request access to personal information that is held by us about you. You also have the right to request correction of any of your personal information that we hold. We will take reasonable steps to make appropriate corrections to your personal information so that it is accurate, complete and up to date.

If you would like to access, or correct, your personal information please write to our Privacy Officer using the contact details set out below. Please make sure you clearly identify the information or correction requested.

In some cases, we may refuse to provide you with access to your personal information. We will only do this if an exception in the Privacy Act applies. If access is refused, we will write to you and explain why.

## **Complaints**

If you have any questions or complaints about the way we have handled your personal information you can contact our Privacy Officer as follows:

**By email: [admin@staines.com.au](mailto:admin@staines.com.au)**

**By telephone: 08 9071 1133**

**By mail: PO Box 6031, Esperance, WA 6450**

We take all enquiries seriously and will attend to your question or complaint promptly.

If you are not happy with the way we deal with your privacy complaint you can make a complaint to the Privacy Commissioner at the Office of the Australian Information Commission (**OAIC**).

More information about making a complaint to OAIC is available at

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

## **Direct Marketing**

We may use your personal information to send marketing materials to you if the marketing material is related to the purpose for which we collected that information.

We will ask for your consent before we use your personal information for marketing purposes if we have not collected that personal information directly from you or where sensitive information is involved.

If you receive marketing offers from us and do not wish to receive them in the future, please contact us.



## **Internet cookies**

An internet cookie is a data file that may be placed on the computer of an internet user during a visit to our website. Cookies are necessary to allow our website and your computer to interact effectively and to enhance security. Cookies can record information about your visit to assist us in better understanding your needs and requirements. If you would like to access our website but do not wish to receive any cookies, you should set your browser settings to refuse to accept cookies. This may mean that you may not be able to access our website or parts of it.

## **Updates to this Privacy Policy**

We will review and update this Privacy Policy from time to time. If we make any changes to this Privacy Policy, we will upload them to our website.

This Privacy Policy will be available to anyone on request, whether at our office or on our website. If you would like a hard copy, please contact our Privacy Policy.

For more information about privacy issues, you can visit the OAIC website at <http://www.oaic.gov.au>

**Policy last updated May 2015.**