

Privacy Policy

SCOPE & PURPOSE

ROBERT FERGUSSON PTY LTD recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is our privacy policy and it tells you how we collect and manage your personal information.

POLICY STATEMENT

We respect your rights to privacy under the *Privacy Act 1988 (Cth)* (**Act**) and we comply with all of the Act's requirements in respect of the collection, management and disclosure of your personal information.

PERSONAL INFORMATION

When used in this privacy policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

We may collect the following types of personal information:

- name
- mailing or street address
- email address
- telephone number
- facsimile number
- age or birth date
- profession, occupation or job title
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise
- information you provide to us through our service centre, customer surveys or visits by our representatives from time to time

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- through your access and use of our website;
- during conversations between you and our representatives; or
- when you complete an application or purchase order.

We may also collect personal information from third parties including:

- from third party companies such as credit reporting agencies, law enforcement agencies and other government entities.

Cookies

In some cases we may also collect your personal information through the use of cookies. When you access websites, a “cookie” (which is a small summary file containing a unique ID number) may be sent to your computer. These cookies enable us to recognise your computer. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users’ habits so that we can improve our online products and services. Our cookies do not collect personal information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users movements, and gather broad demographic information.

IF ROBERT FERGUSSON PTY LTD CAN'T COLLECT YOUR PERSONAL INFORMATION

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to provide you with information about products and services that you may want, including information about discounts, sales or special promotions; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

COLLECTING, HOLDING AND DISCLOSING YOUR PERSONAL INFORMATION

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service.

We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you and to send communications requested by you;
- to answer enquiries and provide information or advice about existing and new products or services;
- to provide you with access to protected areas of our website;
- to assess the performance of the website and to improve the operation of the website;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of [ROBERT FERGUSSON PTY LTD], its related bodies corporate, contractors or service providers;
- to provide your updated personal information to our related bodies corporate, contractors or service providers;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

To whom may we disclose your information?

We may disclose your personal information to:

- our employees, related bodies corporate, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- any organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate (within Australia).

DIRECT MARKETING MATERIALS

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

ROBERT FERGUSSON PTY LTD may provide your contact information to business partners, supply line partners and other organisations for the purposes of direct marketing only where it is relevant for you, the recipient to do so.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You may request access to any personal information we hold about you at any time by sending an email to creditteam@bgwgroup.com.au. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you).

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

DISCLOSURE OF PERSONAL INFORMATION TO ANYONE OUTSIDE AUSTRALIA

We may disclose personal information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

SECURITY

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

LINKS

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

BREACH OF PRIVACY

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it.

Our procedure for investigating and dealing with privacy breaches is located below.

CHANGES TO OUR PRIVACY POLICY

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

This privacy policy was last updated on March 2014.

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact The Privacy Officer using the details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

COMPLAINTS HANDLING POLICY

The goal of the complaints handling process is to achieve an effective resolution of your complaint within a reasonable time frame.

Making a complaint

A complaint can be reported verbally (by telephone or in person) or in writing (letter, email or [online form](#)) to the Privacy Officer.

The complaint must include the following information:

- Name
- Address
- Contact Number
- Email address
- Who your complaint is about
- What your complaint is about – why your privacy has been breached, what happened, where it happened and when it happened. We request that you provide as much detail as possible
- The impact of the breach on you
- The outcome you wish to see from making this complaint

For privacy reasons we only accept complaints made by the person involved or an authorised representative. If you wish to complain on behalf of another person, please provide proof of authority to do so.

Grievance Procedure

Once the complaint has been received the Privacy Officer will acknowledge and record the complaint via our internal Privacy Complaint Register.

The Privacy Officer may liaise with the complainant to seek further information from them and in these circumstances they should be prepared to give as much detail as possible, including any additional documentation. This will enable the contact to impartially investigate the matter to determine an appropriate solution. The investigation process will be documented and all details will be kept confidential.

Once the outcome of the complaint has been handled, the complainant will be advised of the decision in writing. The reasons for the decisions will be outlined.

Where possible, complaints will be resolved within 30 days of being received.