

PRIVACY AND CREDIT REPORTING PRIVACY POLICY (POLICY)

1. PURPOSE OF THIS POLICY

This Policy details how we comply with the Privacy Act, including:

- 1.1. the APPs which regulate how we collect, use, disclose and store Information; and
- 1.2. the Credit Reporting Privacy Code which governs credit reporting.

This Policy does not apply to the collection or use of Information about corporations.

If you would like a hardcopy of this Policy, please contact the General Manager on 03 5228 0999.

2. DEFINITIONS

- 2.1. **APPs** means the Australian Privacy Principles introduced under the Privacy Act;
- 2.2. **Credit Related Information** is used in this Policy to describe Credit Information, as defined in the Privacy Act, including, where the context requires, information obtained from, or given to, Credit Reporting Bodies;
- 2.3. **Credit Reporting Bodies** means agencies or organisations that are involved with collecting, holding, using or disclosing Information for the purposes of providing an entity with information about the credit worthiness of an individual;
- 2.4. **Information** is used in this Policy to describe Personal Information, Sensitive Information and Credit Related Information collectively;
- 2.5. **Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable:
 - 2.5.1. whether the information or opinion is true or not; and
 - 2.5.2. whether the information or opinion is recorded in a material form or not;
- 2.6. **Privacy Act** means the Privacy Act 1988 (Cth) as amended from time to time;
- 2.7. **Sensitive Information** is defined in the Privacy Act to include things such as race, sexual orientation, political opinions, members of a trade association or trade union, criminal record or health information.

3. THE TYPE OF INFORMATION WE COLLECT

3.1. Personal Information

Personal Information that we collect and hold is information that is reasonably necessary for the proper performance of our functions and activities as a supplier of specialist services.

While the type of Personal Information we collect and hold may vary depending on the nature of our interactions with you, generally it will include the following:

- 3.1.1. identification information, such as your name, date of birth and address;

- 3.1.2. contact information, such as telephone numbers and e-mail addresses;
- 3.1.3. licence details;
- 3.1.4. credit information, such as details relating to credit history, credit capacity, and eligibility for credit;
- 3.1.5. credit card information;
- 3.1.6. employment history;

3.2. Sensitive Information

We may at times, subject to this Policy, also collect and hold Sensitive Information.

3.3. Credit Related Information

The type of Credit Related Information we collect and hold includes:

- 3.3.1. credit-related information, such as:
 - 3.3.1.1. the type of credit you have obtained and the terms upon which it was obtained;
 - 3.3.1.2. the day on which the credit is entered into and the day on which it is terminated or otherwise ceases to be in force;
 - 3.3.1.3. repayment history information and default information;
 - 3.3.1.4. scores, ratings, summaries, evaluations and other information relating to your credit worthiness;
- 3.3.2. certain administrative information relating to credit;
- 3.3.3. information which has bearing on your creditworthiness which is relevant to evaluating your eligibility for credit, such as:
 - 3.3.3.1. insolvency information;
 - 3.3.3.2. credit infringement information;
 - 3.3.3.3. court judgments made in relation to your past or present credit arrangements.

4. COLLECTION

We collect Information only by fair and lawful means where it is reasonable and practicable to do so. We do so in order to conduct our business, to provide accurate information to you, to market our services and to meet our legal obligations.

If you do not provide us with Information we reasonably request, we may not be able to provide the requested services to you or guarantee the accuracy of our services. We also may not be able to provide you with the information about the services that you may want.

4.1. How we Collect Information

- 4.1.1. We collect Information that you provide:
 - 4.1.1.1. when visiting our website at www.ehsolutions.com.au;
 - 4.1.1.2. in applications or resumes you lodge with us;

- 4.1.1.3. during telephone, or in person, conversations with us;
- 4.1.1.4. through transactions conducted with us;
- 4.1.1.5. during training sessions with us; and
- 4.1.1.6. in written correspondence to us (including email correspondence).

4.1.2. We also collect Information provided by third parties when it is necessary for a specific purpose, such as checking Information that you have given us or where you have consented, or would reasonably expect us, to collect your Information in this way.

If it is unclear to us whether you have consented to the collection of Information from a third party, we will take reasonable steps to contact you to ensure that you are aware of the reason and purpose of the collection.

If we collect Information from a third party, if it is reasonably possible we will inform you that the Information has been collected and the circumstances of the collection.

4.1.3. We will also collect Information about you if we are required to do so under an Australian law. If so, we will inform you of this, including details of the law requiring the collection.

4.1.4. We may also collect Information about you from a range of publicly available sources including newspapers, journals, directories, the internet and social media sites.

4.2. **Internet Usage**

It is important that you understand that there are risks associated with use of the internet and you should take all appropriate steps to protect your Information. You can contact us by land line telephone or post if you have concerns about making contact via the internet.

We may use cookies when you visit our website (www.ehsolutions.com.au) and, as a consequence, we may collect certain information from you such as:

- 4.2.1. your browser type;
- 4.2.2. your location;
- 4.2.3. your IP address;
- 4.2.4. information about when and how you use our website;
- 4.2.5. information about your past internet usage, such as websites you visit before coming to our website; and

4.3. **Unsolicited Information**

Where we receive unsolicited Information about you, we will check whether that Information is reasonably necessary for our functions or services. If it is, we will handle this Information in the same way we do other Information we seek from you. If not, we will destroy or de-identify it.

5. REASON FOR COLLECTION, DISCLOSURE & USE

5.1. Personal Information

We may use and disclose your Personal Information for the primary purpose for which it is collected, for reasonably expected secondary purposes which are related to the primary purpose, and in other circumstances authorised by the Privacy Act. In general, we use and disclose your Personal Information to:

- 5.1.1. conduct our business;
- 5.1.2. provide our services to you;
- 5.1.3. market our services;
- 5.1.4. communicate with you and assist you with enquiries;
- 5.1.5. comply with our legal obligations;
- 5.1.6. help us manage and enhance our services;
- 5.1.7. gain an understanding of your needs;
- 5.1.8. establish an account for you; and
- 5.1.9. improve your online experience with us.

5.2. Sensitive Information

We will not collect Sensitive Information about you unless:

- 5.2.1. we obtain your explicit consent to collect and use such Sensitive Information; or
- 5.2.2. the Sensitive Information is reasonably necessary for one or more of our functions or activities; or
- 5.2.3. the collection of the Sensitive Information is required or authorised by or under Australian law or a court/tribunal order; or
- 5.2.4. a permitted general situation exists in relation to the collection of the Sensitive Information by us; or
- 5.2.5. a permitted health situation exists in relation to the collection of the Sensitive Information by us.

5.3. Credit Related Information

We collect, use and hold your Credit Related Information:

- 5.3.1. to determine payment terms for the services we provide;
- 5.3.2. for day to day administration purposes; and
- 5.3.3. to satisfy our legal obligations.

In addition, we use Credit Related Information that we obtain from Credit Reporting Bodies to derive information in relation to your creditworthiness and eligibility for credit. This is known as "Credit Eligibility Information".

We may disclose Credit Related Information about you to Credit Reporting Bodies and debt collection companies where you are in payment default. We will only make

a disclosure in these circumstances if we have given you written notice of our intention to disclose and at least 14 days has passed since giving you such notice.

The types of Credit Related Information that we may disclose includes:

- 5.3.4. identification information; and
- 5.3.5. information that you have defaulted on a payment due to us and the amount and details of the default.

We will not disclose Credit Related Information, including Credit Eligibility Information, about you unless you have authorised the disclosure or it is otherwise in accordance with Australian law.

6. **MARKETING**

We may use and/or disclose your Information in order to:

- 6.1. provide you with news and information about services;
- 6.2. provide you with marketing and promotional material that we believe you may be interested in; or
- 6.3. seek your feedback on our services.

Only with your express consent will we use or disclose Information about you for the purposes of direct marketing. You can ask us not to do this at any time by writing to the General Manager

We will not sell your Information.

7. **SECURITY & MANAGEMENT**

We take reasonable steps to protect your Information against misuse, interference, loss, unauthorised access, modification and disclosure. The protective steps we take include:

- 7.1. confidentiality requirements of our employees and subcontractors;
- 7.2. limiting access to Information to employees who have a need to use the Information;
- 7.3. educating our employees in relation to obligations under the Privacy Act;
- 7.4. document storage security policies;
- 7.5. security measures for restricted access to our systems; and
- 7.6. deletion, destruction or de-identification of Information where it is no longer required by us.

8. **CORRECTION**

We aim to ensure that the Information we hold is accurate, complete and up-to-date. We encourage you to contact us in order to update any Information we hold about you. Our contact details are set out at the end of this Policy.

If you contact us regarding an apparent inaccuracy in relation to your Information and we are satisfied that the Information is inaccurate, out-of-date, incomplete, irrelevant or misleading, then reasonable steps will be taken to correct the Information within 30 days, or a longer period as we agree with you in writing.

We will not charge you for a correction.

If we determine that the correction is not required, we will provide you with written notice stating the reasons why the correction was not made and refer you to our complaints procedure.

If a correction is made to any Information that was previously disclosed to a third party, as long as it is reasonable to do so, we will give each such recipient written notice of the correction within a reasonable period. We will also notify you that the correction has been made.

9. ACCESS TO YOUR INFORMATION

You are entitled to access your Information held by us.

If you wish to access your information, you must lodge a request for access by contacting the General Manager by email to info@ehsolutions.com.au, or by post to 10/240 Pakington Street, Geelong West, Victoria 3218, Australia.

We may charge a fee to cover our reasonable costs in meeting an access request. You will be provided with access to your Information within 30 days of the request (unless unusual circumstances apply).

We are not required to give you access to your Information if:

- 9.1. it would be unlawful to do so; or
- 9.2. denying access is required or authorised by an Australian law or a court/tribunal order; or
- 9.3. to do so would likely prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

If we do not give you access to your Information you will receive written notice that explains the reason for the refusal.

10. COMPLAINTS

Complaints about alleged breaches by us of the Privacy Act, the APPs, the Credit Reporting Privacy Code or this Policy can be made by contacting the General Manager by email to info@ehsolutions.com.au. If you do not consider that your complaint has been adequately dealt with by us, you may make a further complaint to the Office of the Australian Information Commissioner, which has complaint handling responsibilities under the Privacy Act.

11. ACCESS TO THIS POLICY

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment.

The most current version of this Policy will be uploaded to our website at www.ehsolutions.com.au or can be obtained by contacting our Privacy Officer:

E-Mail: info@ehsolutions.com.au

Phone: 1300 856 510

Postal Address: 10/240 Pakington Street, Geelong West, Victoria 3218

12. FURTHER INFORMATION

If you have any questions about privacy-related issues please contact our Privacy Officer.

For further information about privacy, the protection of privacy and credit reporting can also be found on visit the Office of the Australian Information Commissioner's website at www.oaic.gov.au.