

Privacy Policy

Belington Pty. Ltd. trading as Old Red Brick Co. (ORB) is committed to protecting your privacy and complying with the *Privacy Act 1988* (Cth) as enacted via the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth) effective 12 March 2014 to ensure we comply with the Australian Privacy Principles for the collection, holding, use and disclosure of personal information.

This Privacy Policy is current as at 12 March 2014. From time to time we may find it necessary to change this Privacy Policy to reflect changes in the law or our commercial activities. You can obtain the latest version of our Privacy Policy by contacting our Privacy Officer or visiting our website at www.oldredbrickco.com.au/privacy-policy.

This Privacy Policy contains the following information:

- the kinds of personal information that we collect and hold;
- how we collect and hold personal information;
- the purposes for which we collect, hold, use and disclose personal information;
- how you can access your personal information that is held by us and seek the correction of such information;
- how you can complain about a breach of the *Privacy Act 1988*, the Australian Privacy Principles, or a registered APP Code (if any) that binds us, and how we will deal with such a complaint; and
- whether we are likely to disclose personal information to overseas recipients.

The policy applies to an individual, which holds the meaning of a “natural person” only. Examples of personal information the policy applies to include:

- full name
- any alias or previous name
- date of birth
- sex
- current / last known address and two previous addresses
- name of current and any last known employer
- drivers licence number if applicable

Collection and Use

We may collect information to assist us in responding to your queries, as part of the recruitment and selection process, and to provide you with the products and services you require. The information collected is only that which is reasonably necessary for us to provide you with our services, functions or activities. If you do not wish to disclose your personal information to us, then we may not be able to respond satisfactorily to your query or request.

ORB collects information about your use of our website by recording your IP address, country, pages downloaded, date / time of visit and the type of browser used. For example, if you send us an e-mail, we may collect your name, address and e-mail address to respond to your enquiry; however, we will not disclose this information without your consent. This information is stored in a secure location which cannot be accessed from our website. The information is analysed for statistics on the popularity of our website and no attempt is made to identify users except where required by law.

We try to ensure that any personal information that we hold is accurate, complete and up to date. We do this by collecting information about a person as much as possible from the person. Another way that we do this is by correcting your personal information if it is incorrect and you request us to do so.

We may, with your consent, also collect personal information so we can provide you with direct marketing information which may be of interest to you. We will not disclose that information to others unless you have consented, or we are required to disclose it by law. We will give you the opportunity

not to receive this marketing information when we collect your details or on occasions when we send such material to you. We continue to be bound by the *SPAM Act 2003* (Cth) and the *Do Not Call Register Act 2006* (Cth) when we undertake direct marketing and we comply with the provisions of these Acts.

Where an individual has consented to the use or disclosure of personal information, we shall only use that information for the primary purpose for which it was collected. We may use the information for a related secondary purpose such as:

- it is required to be disclosed by law,
- it is reasonably required by a law enforcement agency or body, including any court or tribunal;
- there is a serious threat to public health, safety or interest;
- it is necessary to prevent, detect or investigate improper conduct;
- any other exception such as a permitted general situation or permitted health situation that is set out in the *Privacy Act 1988*, or
- consent has been given by you for its' release.

Should we use the information for a secondary purpose, ORB will maintain a written note of its' use.

AdWords Remarketing

This website may use the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our site. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to our website. Of course, any data collected will be used in accordance with this Privacy Policy and Google's privacy policy.

You can set preferences for how Google advertises to you using the Google Ad Preferences page, and if you want to you can opt out of interest-based advertising entirely by cookie settings or permanently using a browser plugin.

Web Site Cookies

We may use remarketing and other audiences' features to reach people who have previously visited our website. The purpose is to help match interests relevant to you. This means we or third parties may show ads across our site. It is possible to opt out of these advertising cookies. For more information visit www.privacychoice.org or other relevant sites.

Anonymity and Pseudonymity

You may wish to deal with us anonymously or using a pseudonym (a false name that is not your actual name), for example, if you wish to make an enquiry about the availability or price of a particular product. In these circumstances we will respond to your query without seeking to collect personal information about you. However, in those circumstances where it is impracticable for us to deal with you if you do not identify yourself, then we are not obliged to give you the option of anonymity or of using a pseudonym. We will inform you if we believe that such a situation exists. If you choose not to provide us with personal information then we may not be able to provide you with the good or service that you seek.

Disclosure

We do not sell or disclose the personal information that we hold to any person outside ORB for direct marketing by that other person. Personal information that we hold may be exchanged to related parties of ORB. This disclosure is permitted by the *Privacy Act 1988*. Personal information that we hold may be disclosed to agents or contractors who act on our behalf to collect debts or recover

goods and to service contractors and companies that provide support to our customers. We may also disclose personal information to our solicitors and accountants. The identity of these people may change from time to time. We are not likely to disclose personal information to overseas recipients.

Any unsolicited information ORB receives, that could not have been collected as if we had solicited ourselves, will be destroyed unless after notifying you, we are advised we may hold the information. The information will then be stored and managed in compliance with the remainder of the Privacy Principles.

Security

ORB shall take reasonable steps to protect personal or sensitive information we hold from misuse, loss, unauthorised access, modifications or disclosure.

Where personal or sensitive information is stored (either electronically or by other means), information will be identified as being "confidential" and access shall be restricted through either lockable storage or electronic password.

ORB has internal computer access policies and procedures that require staff to follow the Australia Privacy Principles, including specifically, security of personal information.

Where identifiers are used, they shall not use an individual's tax file number or other number which has been assigned by a government agent or agency.

Destruction

Personal or sensitive information which is collected shall be destroyed or de-identified once it is no longer required for its primary purpose, including information collected as part of the recruitment process.

Documents will be destroyed either through the use of a shredding device, or disposed of in a secured bin for collection by an approved document management organisation.

Electronic files containing personal or confidential information shall be erased. ORB has internal computer access policies and procedures that require staff to follow the Australian Privacy Principles, including specifically, when advised, the requirement to suitably and efficiently destroy personal information.

Your Access to Information

The *Privacy Act 1988* provides you with access to personal information held about you and you may ask us to correct inaccurate information if required. You may be charged a fee for accessing your personal information and will need to establish your identity and right to that information. Requests for access should be directed to our Privacy Officer.

Access to personal information held on an individual will be provided except to the extent that:

- providing access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- providing access would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- providing access would be unlawful;
- providing access would reveal commercially sensitive information; or
- other exclusions as provided for or required by the Australian Privacy Principles.

Where we are not required to provide you with access to the information, we may if reasonable, consider the use of a mutually agreed intermediary to have access to the information; or provide you with a reason for the denial of access.

If you wish to obtain more information about our Privacy Policy, or obtain a hard copy of this Privacy Policy (or a copy in any other format) then you may contact our Privacy Officer. Our Privacy Officer will take reasonable steps to respond to your inquiry and will do so promptly (usually within 14 to 30 days).

Should you have any queries in regard to privacy issues, please contact our Privacy Officer at:

The Privacy Officer
Old Red Brick Co.
165 William Street
Beverley SA 5009

Telephone: (08) 8347 2419
Fax: (08) 8347 2144
Email: info@oldredbrickco.com.au

Making a complaint

If you wish to make a complaint because you believe that we have breached either your privacy, the *Privacy Act 1988*, the Australian Privacy Principles, the registered Credit Reporting Privacy Code, or a registered APP Code that binds us, please contact our Privacy Officer using the address listed above.

The *Privacy Act 1988* requires that you first make your complaint to us in writing and that we are then given a reasonable time to respond to you (usually 30 days). If you make a complaint to our Privacy Officer but you are not satisfied with the response that you receive, you can then make your complaint to the Commonwealth Privacy Commissioner. Their contact details are:

The Office of the Australian Information Commissioner
GPO Box 2999
Canberra ACT 2601

Phone: 1300 363 992
Fax: (02) 9284 9666
Website: www.oaic.gov.au