

1 About this privacy policy

This document sets out the policy of Wint and Kidd Pty Ltd (ACN 604 598 950) ("Wint and Kidd", "we", "us" or "our") relating to the privacy of your personal information (**Privacy Policy**).

Wint and Kidd and its related entities (including, but not limited to, Wint & Kidd Inc (CS201423033)) are committed to protecting the privacy of the personal information we collect and receive. We are bound by the Australian Privacy Principles (**APPs**) contained in the Privacy Act 1988 (Cth).

This Privacy Policy applies to all your dealings with us whether at one of our division offices, through our call centres, via our websites or with one of our representatives.

This Privacy Policy seeks to explain:

- ❖ the kinds of personal information that we collect and hold;
- ❖ how we collect and hold your personal information;
- ❖ why we collect, hold, use and disclose your personal information;
- ❖ how you may access and seek the correction of your personal information as held by us;
- ❖ how you may complain about a breach of the APPs or a registered APP code (if any) that we are bound by, and how we will deal with such a complaint; and
- ❖ if we are likely to disclose your personal information to overseas recipients and the countries in which such recipients are likely to be located (if it is practicable to specify those countries in this policy).

You accept this Privacy Policy and expressly consent to our collection, use and disclosure of your personal information as described in this Privacy Policy by using our website (www.wintandkidd.com.au), our mobile applications, our products and services or by other communications with us.

2 Your Personal Information

We only collect personal information (being information that identifies or could reasonably identify an individual) where we consider it to be reasonably necessary for one or more of our business functions or activities, and will do so in accordance with the APPs, including:

- ❖ when you participate in a promotion, competition, promotional activity, survey, market research, subscribe to our mailing list or interact or follow our social media pages;
- ❖ via our offices;
- ❖ when you request a quote or place an order with us;

- ❖ when you apply for a position with us
- ❖ as you navigate our website; and
- ❖ via trade shows or other events.

The kinds of personal information we may collect from you will depend on what type of interaction you have with us but may include:

- ❖ your name, date of birth, age and occupation;
- ❖ your postal address, email address, telephone number and fax number;
- ❖ previous order information;
- ❖ your IP address;
- ❖ insurance, credit card and other banking details; and
- ❖ your job title & your employer.

3 How we collect your personal information

We will solicit your personal information by lawful and fair means directly from you unless it is unreasonable or impracticable to do so.

- ❖ We will collect directly personal information:
 - ❖ over the telephone;
 - ❖ in writing (such as letters, faxes and emails);
 - ❖ on hard copy forms (including registration forms, competition entry forms and surveys);
 - ❖ in person (at job interviews, meetings or seminars); or
 - ❖ through our website (online purchases, web form submission or participate in a live chat); or
 - ❖ through electronic systems such as applications; and

We may collect your personal information from third parties and public sources including:

- ❖ your legal representatives;
- ❖ direct marketing database providers;
- ❖ Our business partners, associates and related companies
- ❖ the Australian Tax Office (ATO);
- ❖ the Australian Securities and Investment Commission (ASIC);

- ❖ social media; and phone directories, web pages, membership lists, trade publications and directories, online search engines, professional and trade associations, ASIC, bankruptcy or court registry searches.

4 Using your personal information

We collect your personal information so that we can use it for our functions and activities and provide products and services to you, which include, among other things:

- ❖ providing you with quotes;
- ❖ processing orders you place with us;
- ❖ administering and responding to your enquiry or feedback about our services;
- ❖ conducting, and allowing you to participate in, a promotion, competition, promotional activity, survey or market research;
- ❖ promoting and marketing current and future services to you, informing you of upcoming events and special promotions and offers and analyzing our products and services so as to improve and develop new products and services;
- ❖ compilation and maintenance of contact lists for use by us, our related bodies corporate and business partners and associates, and the provision of consultancy, analytics, marketing and other trade-related services;
- ❖ facilitating our internal business operations, including fulfilment of any legal and regulatory requirements;
- ❖ improving the operation or navigation of our websites;
- ❖ to provide the service you have requested or to answer your inquiry;
- ❖ managing and running our website;
- ❖ delivering or enhancing our services; and
- ❖ any other purpose directly related to our work and for which you have provided consent (where it is reasonably required by law).

Our website requires subscriptions or registrations to use certain services, functions or content. You will know what information is being collected via these processes when you complete the relevant forms and provide the required details prior to submitting the application. We will collect data relating to any transactions you carry out via our website and the fulfilment of your order.

We may also use your data to monitor for any unauthorized use of our website, content or subscriptions to our services.

5 Purpose of collection

If we collect personal information for a purpose (the primary purpose), we will not use or disclose the information for any other purpose (the secondary purpose) unless:

- ❖ you would have consented to the use or disclosure of the your personal information; or
- ❖ in relation to the use or disclosure of your personal information:
- ❖ you would reasonably expect us to use or disclose your information for the secondary purpose and the secondary purpose is directly related to the primary purpose (sensitive information) or related to the primary purpose (not sensitive information);
- ❖ use or disclosure is required or authorized under Australian law or a court/tribunal;
- ❖ a permitted situation exists in relation to our use or disclosure of the information;
- ❖ a permitted health situation exists in relation to use or disclosure of the information; or
- ❖ we reasonably believe that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

If we use or disclose your personal information because we reasonably believe that the use or disclosure of your information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body, we will make a written note of the use or disclosure.

6 Do you have to provide personal information?

You can refuse to provide personal information. However a refusal may mean that the service you requested is not provided or membership will be refused or forfeited.

7 Sharing your personal information

We may use and disclose personal information to third parties. Types of organizations to whom we may disclose your personal information includes

- ❖ government bodies such as ATO, ASIC, Australian Prudential Regulatory Authority and the police or courts (as required by law);
- ❖ professional or government organizations;
- ❖ our related bodies corporate, business partners and associates; and
- ❖ our contracted service providers including:

- ❖ information technology service providers;
- ❖ marketing and communications agencies;
- ❖ mailing houses, freight and courier services;
- ❖ printers & distributors of marketing material; and
- ❖ external advisers (recruiters, auditors & lawyers).

8 Cookies

To improve our services, we sometimes collect de-identified information from web users. Although the information collected does not identify an individual, it does provide us with useful statistics that permits us to analyse and improve its web services.

When you visit our website, a record of your visit is logged and the following data is supplied by your browser:

- ❖ your IP address and/or domain name;
- ❖ your operating system (type of browser & platform);
- ❖ the date, time and length of your visit; and
- ❖ the resources you accessed or downloaded.

We use this information to customize information for website visitors and to collect aggregated data for the purposes of analysis, quality control, administering and improving the website. It is not used for any other purpose.

Aggregated data may be shared with third parties. You can stop your browser from accepting new cookies or disable cookies altogether by changing your browser preferences.

9 Direct Marketing

If we hold your personal information, we may use or disclose that information (other than sensitive information) for direct marketing if:

- ❖ we collected the information from you or a public source in accordance with this Privacy Policy; and
- ❖ you would reasonably expect us to use or disclose the information for that purpose; and
- ❖ we provided you with a simple way to opt out of receiving direct marketing from us; and
- ❖ you have not made such an opt out request to us

10 How to opt out of direct marketing

If we use or disclose your personal information for the purpose of direct marketing, you may request not to receive direct marketing communications from us.

If we use or disclose your personal information for the purpose of facilitating direct marketing by other organizations, you may request that we do not use or disclose your information for this purpose.

We will give effect to your request not to receive direct marketing from us or an entity facilitated by us free of charge within a reasonable time after the request is made.

11 Protecting your personal information

We store information in different ways, including paper and electronic form. We take reasonable steps to protect it from misuse, interference, loss, unauthorized access, modification or disclosure including:

- ❖ secure password protected databases for storage;
- ❖ confidentiality requirements of staff;
- ❖ security for access to our systems including firewalls;
- ❖ servers kept at a secure location with limited access;
- ❖ document storage security requirements;
- ❖ access controls for our building;
- ❖ limited the provision of personal information to third parties and subject to guarantees about use; and
- ❖ our staff are trained to deal with the information.

We cannot guarantee that personal information will be protected against unauthorized access or misuse and we do not accept any liability for the improper actions of unauthorized third parties.

We will retain your personal information for as long as necessary to fulfil our obligations to you, to protect our legal interests, to comply with an Australian law or as otherwise stated to you when we collected your personal information.

Once we are no longer required to retain your personal information, we will take reasonable steps to destroy your personal information or to ensure that your personal information is de-identified.

12 Disclosing your personal information overseas

We may disclose your personal information to third parties operating outside Australia who are a related body corporate, or work with us or one of our suppliers, agents, or partners.

We may also store your personal information on servers based overseas or in the "cloud" or other types of networked or electronic storage.

Before disclosing your personal information to an overseas third party, we will take reasonable steps to ensure that the overseas recipient:

- ❖ does not breach the APPs in relation to your personal information; or
- ❖ the recipient is subject to a law, or binding scheme, that has the effect of protecting your personal information in a way that is substantially similar to the way in which the APPs protect the information.

Personal information may be disclosed by us to our related entities and third parties in jurisdictions including the Philippines, United States of America, United Kingdom, France, Germany, Japan and New Zealand.

To make it easy for you to deal with us and provide you with a more personal and consistent experience, we may exchange and combine personal information with our related entities for the purposes described in this policy.

13 Anonymity

You have the option of not identifying yourself or using a pseudonym when dealing with us provided that is it lawful and practicable.

We will try to accommodate a request for anonymity if possible. However, your right to anonymity does not apply in relation to a matter if:

- ❖ we are required or authorized by or by law or a court/tribunal order to deal with individuals who have identified themselves; or
- ❖ it is impracticable for us to deal with individuals who have not identified themselves.

It is our policy to enable you to access our website and make general phone queries without having to identify yourself and to enable you to respond to our surveys anonymously.

In some cases, if you don't provide us with your personal information when requested, we may not be able to respond to your request or provide you with products or services.

14 Accessing to your personal information

You have the right, upon request, to access any of our records containing your personal information.

To request access to your personal information please contact our privacy officer.

We will respond to your request to access your personal information within a reasonable period of time.

On the basis that it is reasonable and practicable to do so, we will give you access to the information requested.

If we refuse your request to access personal information, we will provide a written notice setting out the reasons for the refusal & how you can complain about the refusal.

15 Help us keep your personal information accurate

We will take reasonable steps to ensure our records of personal information are accurate, up to date and complete.

If you think there is something wrong with the information we hold about you please contact our privacy officer to let us know if there are any errors and keep us up-to-date with any changes, and we will try to correct your personal information.

We will respond to your request to correct your personal information free of charge and in a reasonable period of time. If we refuse your request, we will provide you with a written notice setting out the:

- ❖ reasons for the refusal; and
- ❖ mechanisms available to complain about the refusal.

If we refuse to correct your personal information, you may request that we associate your information with a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading. We will take reasonable steps to make the statement visible to users of your personal information.

If we do correct your personal information and we have previously disclosed your personal information to a third party, upon your request, we will notify that third party of the correction unless it is impracticable or unlawful to do so.

16 Dealing with SPAM

We will not send you any commercial electronic messages (SMS or emails) unless it is permitted by the Spam Act (for example, we have your express or inferred consent). Any commercial electronic message that we send will identify us as the sender and will include relevant contact details and an unsubscribe facility.

If you do not wish to receive commercial electronic messages from us, please contact the privacy officer.

17 Do not call register

We will not call you on a number listed on the Do Not Call Register unless it is permitted under the Do Not Call Register Act and related instruments.

If you do not wish that we call you on a particular number, please contact the privacy officer.

18 Resolving your privacy issues

If you have any issues you wish to discuss with us or if you're concerned about how we have collected or managed your personal information, please contact the privacy officer.

For information about privacy or if your concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner at www.oaic.gov.au and on 1300 363 992.

19 Changes to this privacy policy

We may, from time to time, review and update this privacy policy to take account of new laws and changes to our operations. The updated Privacy Policy will also apply to previously provided information.

20 How to access this privacy policy

This Privacy Policy is available on our website. A printed copy of the privacy policy can be obtained free of charge by contacting our Privacy Officer.

21 Our privacy officer

Our privacy officer can be contacted at:

- ❖ Email: contact@wintandkidd.com.au
- ❖ Telephone: 1800 000 744
- ❖ Fax: 1800 000 774
- ❖ Post: 7-11 Ceylon St, Nunawading VIC 3131.

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