

1. ABOUT THIS POLICY

This policy has been adopted by us, Norwood Industries Pty Ltd (ABN 90 004 817 207). We understand that privacy is an important issue for many individuals. We aim to manage personal information in an open and transparent way in accordance with the practices and procedures set out in this policy.

2. PERSONAL INFORMATION

2.1 "Personal information" means information that identifies an individual, or information that can reasonably be linked to information that can identify an individual.

2.2 Common examples of personal information about you (as an individual) include your name and address, your bank account details, your credit card information, photographs of you and information about your opinions and what you like. Personal information can include information that is factually incorrect, and information that is not recorded in a material form.

2.3 We collect and hold kinds of personal information that are relevant to us doing business with you or your employer. Similarly, the purposes for which we collect, hold, use and disclose personal information include purposes relevant to us doing business with you or your employer.

3. HOW WE COLLECT PERSONAL INFORMATION

3.1 We collect personal information only by lawful and fair means. We may collect personal information that is communicated to us in writing or orally, including in emails, during phone conversations and via our website.

3.2 We will only collect personal information about you from you, unless it is unreasonable or impracticable for us to do so.

3.3 We may collect personal information about you when it is reasonably necessary for one or more of our functions or activities. You have the option of dealing with us anonymously or by using a pseudonym, but only if it is practicable for us to deal with you in that way. If you want to acquire our products or use our services, it may not be practicable for you to deal with us anonymously or by using a pseudonym. For example, it is not practicable for us to deliver products to you without knowing your name and address.

3.4 If we collect personal information about you we will take reasonable steps to ensure you are aware of the following matters (unless circumstances make it unreasonable for us to do so):

- (a) who we are and how to contact us;
- (b) the fact that we have collected personal information about you (unless you are already aware of this);
- (c) the purposes for which we collect the information;
- (d) the main consequences for you if we do not collect the information (if any);
- (e) the names or types of other entities that we usually disclose the information to;
- (f) whether we are likely to disclose the information to overseas recipients, including, if practicable, the countries those recipients reside in;
- (g) the fact that this policy sets out our practices and procedures for how you can access and correct personal information we hold about you, and how we attempt to resolve complaints about our management of personal information; and
- (h) any laws or court/tribunal orders that we have followed to collect the information.

3.5 We will ensure you are aware of the above matters by notifying them to you and/or by referring you to this policy at or before the time we collect the information or, if that is impracticable, as soon as practicable after we collect the information.

3.6 We take reasonable steps to ensure that the personal information we collect is accurate, up to date and complete.

4. HOW WE USE AND DISCLOSE PERSONAL INFORMATION

4.1 If we hold personal information about you that was collected for a particular purpose, we will generally only use or disclose the information in accordance with that purpose.

4.2 However, in certain situations we may legally use or disclose personal information about you for a different purpose. This includes where you provide us with consent to use or disclose the information for a different purpose. We may also use or disclose the information for a different purpose where it is related to the original purpose of collection, and where you would reasonably expect us to do so. Other situations may also arise.

4.3 We take reasonable steps to ensure that the personal information we use and disclose is accurate, up to date and complete.

5. HOW WE HOLD PERSONAL INFORMATION

5.1 We hold personal information by recording and storing it in a variety of forms, including in hardcopy and electronic files and databases.

5.2 We take reasonable steps to ensure that the personal information we hold is protected from misuse, interference, loss and unauthorised access, modification or disclosure.

5.3 If we hold personal information about you that we no longer need for any purposes for which we may legally be permitted or required to use or disclose the information, we will take reasonable steps to destroy the information or to ensure the information is de-identified.

6. HOW WE GRANT ACCESS TO PERSONAL INFORMATION

- 6.1** If we hold personal information about you, we will generally grant you access to the information on your request. However, in certain situations we may legally refuse to grant you access.
- 6.2** If you request access in a particular way, we will generally give you access in that way so long as it is reasonable and practicable for us to do so. In any event, we will take reasonable steps to give you access in a way that meets the needs of both us and you.
- 6.3** If we refuse to grant you access, or refuse to give you access in the way you request, we will give you a written notice that sets out the reasons for our refusal (provided it is not unreasonable in the circumstances to set out those reasons), and that sets out the complaint process you can use if you disagree with our refusal (which may be the same process referred to in this policy below).
- 6.4** We will respond to requests for access within a reasonable time of receiving them. We may charge you for giving you access to personal information that we hold about you, provided that the charge is not excessive and does not relate to the making of your request.

7. HOW WE CORRECT PERSONAL INFORMATION

- 7.1** We will take reasonable steps to correct personal information we hold about you on your request, or if we are satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading.
- 7.2** We will correct personal information in accordance with this policy by ensuring the information is accurate, up to date, complete, relevant and not misleading.
- 7.3** If we refuse your request for correction, we will give you a written notice that sets out the reasons for our refusal (provided it is not unreasonable in the circumstances to set out those reasons), and that sets out the complaint process you can use if you disagree with our refusal (which may be the same process referred to in this policy below).
- 7.4** If we refuse your request for correction, we will take reasonable steps on your request to associate a warning statement with the information saying that it is inaccurate, out of date, incomplete or misleading (as the case may be). We associate warning statements with personal information by making the statements apparent to users of the information.
- 7.5** We will respond to requests for correction and requests regarding warning statements within a reasonable time of receiving them. We will not charge you for making such requests or for us acting on such requests.

8. OTHER ISSUES

- 8.1** "Sensitive information" is a special type of personal information. It includes things like information about an individual's racial or ethnic origin, their health or medical information and their political opinions. As we do not generally collect or hold sensitive information, some parts of this policy may not specifically apply to sensitive information.
- 8.2** If you have a complaint about our management of personal information, you should send your complaint to us in writing in the first instance. We will respond to your complaint within a reasonable time of receiving it. If we are not able to resolve your complaint within 30 days, you may decide to lodge your complaint with the Office of the Australian Information Commissioner.
- 8.3** This policy is subject to change without notice. Please check our website regularly for the current version. We will take reasonable steps to provide you with a copy of this privacy policy in another form on your request.