



Adfinis Pty Ltd – Privacy Policy

Adfinis Pty Ltd will on occasions collect personal information from individuals. The Privacy Act does not apply to companies. The privacy of your personal information is afforded the highest level of importance by Adfinis Pty Ltd. We are bound by the Privacy Act 1988 (Cth) regarding the manner in which we handle your personal information and how we respond to your requests to access and correct it. This document sets out our information handling procedures and the rights and obligations that both you and we have in relation to your personal information.

We note that if Adfinis Pty Ltd is not able to collect your personal information it may not be able to provide you with a credit facility if you are eligible and to provide you with an appropriate level of service.

How we collect your information

We primarily collect information about you through correspondence we engage in with you, for example, through application forms, telephone conversations and emails. We also collect information from sources that are publicly available such as websites, journals and phone books. Sometimes, we collect information about our customers from our sales agents and distributors who have direct contact with you on our behalf. We also make use of cookies on our website to collect personal information about visitors to the site including browsing habits.

Kinds of information that we hold about you

We only hold information about you if it is relevant to providing the services and products that we provide and for the provision of information to manufacturers in the event of a recall of products. Such information generally includes your name, contact details, type of business, payment details, account number, records of correspondence and billing documents. If you are one of our suppliers, we may collect other information about you that we feel is necessary, such as the nature of the products or services that you supply, quotes that you provide and your direct credit details.

How we hold your information

Depending on the circumstances, we may hold your information in either hardcopy or electronic form, or both.

How we use your information

We use your personal information:

- To provide you with our products and services;
- To administer our customer relationship with you;
- For the provision of information to manufacturers in the event of a recall of products and to warranty service providers;
- For internal purposes such as procedural assessments, risk management, product and service reviews, staff training, accounting and billing; and
- To identify, and inform you of products and services that may be of interest to you including direct marketing to you

If you are one of our suppliers, we may use your information to facilitate our business relationship with you, for example, to assess goods or services that you supply or to review a commercial proposal that you have put to us.

How we use or disclose your information

Generally, we will only use or disclose your personal information for a purpose that is related to the product or service that we are providing to you. This may include disclosures to organisations that provide us with professional advice, such as solicitors, accountants and business advisors, and to contractors to whom we out-source certain functions, such as mailing houses, electronic network administrators and debt collection agencies. However, where possible, we take contractual measures, and in all other circumstances, take all reasonable measures, with our contractors to ensure that they comply with the privacy standards set out in the Privacy Act 1988 (Cth). We may also disclose information where it is expressly permitted under the Privacy Act 1988 (Cth), for example, where it is with your consent or where we are legally required to do so, such as under a court order or taxation laws.

How we secure your information

We hold all hardcopy and electronic records of personal information in a secure manner to ensure that they are protected from unauthorised access, modification or disclosure. Our staff follow strict information handling procedures and we only permit those staff whose tasks require use of your information to access it. We delete your personal information once it is no longer needed or required to be kept by law by deleting electronic records.



Your right to lodge a complaint

If you are not satisfied with how we have handled your personal information, or want to complain that there has been a breach of an Australian Privacy Principle or any APP code which applies you are entitled to lodge a complaint with the Federal Privacy Commissioner. Information regarding how to lodge a complaint is available from the Commissioner's website at www.oaic.gov.au or by ringing the Commissioner's information line on 1300 363 992. However, before investigating a complaint, the Commissioner is legally required to be satisfied that you have first expressed your concern to us to afford us an opportunity to resolve the complaint directly, unless it is inappropriate for you to do so. You may lodge a complaint with our Privacy Officer either by mail at Adfinis Pty Ltd 846 Springwood Qld 4127, or by email to privacy.officer@adfinis.com.au. We will inform you of who will handle your complaint and you may contact our Privacy Officer to enquire about its stage of progress at any time. We will go to great lengths to ensure that your complaint is resolved to your satisfaction.

Your right of access

You may request access to your personal information at any time by sending a written request to our Adfinis Pty Ltd Privacy Officer by mail at PO Box 846 Springwood Qld 4127 or by email to privacy.officer@adfinis.com.au. In your request, please state how you would like to obtain access. For example, you may like to inspect our records at our premises or you may prefer to be sent a photocopy or an electronic version of your information. You do not need to provide a reason for your request. Once our Privacy Officer has verified your identity, your request will be forwarded to our information systems manager who will arrange for access to be provided to you in an appropriate manner within 14 days. We may charge a small fee for providing access if it requires a significant amount of time to locate your information or to collate or present it in an appropriate form. If your account is held in conjunction with another individual, we will provide each person named on the account with access to information held about each account holder. Our Privacy Officer will follow up your request to ensure that the level of access with which you have been provided is to your satisfaction. In rare circumstances, and only where it is permitted under the Privacy Act 1988 (Cth), we may not be able to provide you with access to your information; for example, where it will have an unreasonable impact upon the privacy of others, where it relates to legal proceedings between us through which the information would not otherwise be available, where it would be prejudicial to negotiations we are holding with you, where we are required by law to withhold the information or where it would reveal information relating to our commercially sensitive decision making processes. If we are unable to provide you with access, we will state why this is so and consider whether the use of an intermediary would be appropriate to provide you with an explanation of your personal information.

You may correct your information

If your personal information is inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request we correct the information and we will consider your request. In the unlikely event that we disagree about the accuracy of the information and are unable to change it, you may provide us with a statement indicating that you dispute its accuracy and we will associate the statement with your information in such a manner that it will be brought to the attention of each person who uses the information.

Direct marketing

We would like to directly market to you about goods and services that we believe may be of interest to you, however, we understand that you may not wish to receive such material. If so, please inform our Privacy Officer of this in writing by mail at Adfinis Pty Ltd 846 Springwood Qld 4127 or by email to privacy.officer@adfinis.com.au and we'll ensure that your name is removed from our direct marketing list.

Transfer of your information overseas

We will only transfer your personal information overseas if the transfer is in accordance with the Privacy Act.

We may need to change our privacy policy from time to time

Due to changing business circumstances, we may need to change our privacy policy from time to time. If we do, we will endeavour to ensure that your overall level of privacy protection is not diminished and will publish the changes on our website. Any actions that we have taken before the change will continue to be regulated by the privacy policy that existed before the changes were made.



Further information

We are happy to provide you with further information regarding your privacy. If you have any queries or requests in this respect, please contact our Privacy Officer either by mail at Adfinis Pty Ltd 846 Springwood Qld 4127 or by email to privacy.officer@adfinis.com.au.