



P&CS QLD PRIVACY POLICY

PURPOSE

P&Cs Qld is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

This Privacy Policy is to inform you of:

- how and when P&Cs Qld collects personal information;
- how P&Cs Qld uses and discloses personal information;
- how P&Cs Qld keeps personal information secure, accurate and up-to-date;
- how an individual can access and correct their personal information; and
- how P&Cs Qld will facilitate or resolve a privacy complaint.

DEFINITIONS

Personal information is defined by the *Privacy Act 1988* (Cth) to mean information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

Sensitive information is defined by *Privacy Act 1988* (Cth) to mean information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

In general, we attempt to limit the collection of sensitive information we may collect from you, but we may be required to collect sensitive information from you in order to carry out the services provided to you. However, we do not collect sensitive information from you without your consent.

The type of sensitive information we may collect from you or record about you is dependent on the services provided to you P&Cs Qld and will be limited to the purpose(s) for which it is collected. We do not use sensitive information to send you Direct Marketing Communications without your express consent.

CONSENT TO COLLECTION OF CERTAIN TYPES OF SENSITIVE INFORMATION

We may collect certain types of sensitive information where you have consented and agree to the collection of such information.



Generally speaking, we will obtain this type of consent from you at (or around) the point in time in which we collect the information, but the main type of sensitive information that we may collect (if any) will usually relate to:

- the criminal record of an individual;
- food restrictions (due to religious beliefs);
- membership of political organisations; and
- the health or medical information about an individual,

but only to the extent that where you volunteer such information or if it is necessary for, or incidental to, the purposes of collection.

PURPOSES OF COLLECTION

We only collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

The type of information we may collect from you includes (but is not limited to) the following:

- your contact information such as full name (first and last), e-mail address, current postal address, delivery address (if different to postal address) and phone numbers;
- your participation in any activity or event organised by P&Cs Qld;
- your opinions, statements and endorsements collected personally or via surveys and questionnaires, including but not limited to your views on the products and services offered by P&CS QLD; and
- if you are requesting products or services from us or we are purchasing goods or services from you, then any relevant payment or billing information (including but not limited to bank account details, direct debit, credit card details, billing address, repayment information and invoice details).

If possible, or unless provided otherwise under this privacy policy, we will collect your information directly from you. If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and why.

When you engage in certain activities, such as entering a contest or promotion, filling out a survey or sending us feedback, we may ask you to provide certain information. It is completely optional for you to engage in these activities.



Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory information we may be unable to effectively provide our services to you.

USE AND DISCLOSE PERSONAL INFORMATION

We will only use or disclose your personal information for the primary purposes for which it was collected or as consented to and/or as set out below.

You consent to us using and disclosing your personal information to facilitate a purpose in connection with:

- if required, the verification of your identity;
- the verification of your date of birth, if applicable;
- the provision of our products and services to you;
- your participation in any activity or event organised by P&Cs Qld;
- to facilitate the administration, management and improvement of P&Cs Qld;
- the administration, management and improvement of our products and services, including charging, billing, credit card authorisation and verification, checks for financial standing, credit-worthiness (including but not limited to undertaking an assessment for credit loss and obtaining credit references, if applicable), fraud and collecting debts and business systems and infrastructure;
- marketing, updates and promotional activities by us and our related bodies (including by direct marketing messages) such as our newsletters;
- to provide customer service functions, including handling customer enquiries and complaints;
- to offer you updates, or other content or products and services that may be of interest to you;
- our compliance with applicable laws;
- the sale, and matters in connection with a potential sale, of our business or company to a third party; and
- any other matters reasonably necessary to continue to provide our products and services to you.

We may also use or disclose your personal information and in doing so we are not required to seek your additional consent:

- when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose;
- if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;
- if we have reason to suspect that unlawful activity has been, or is being, engaged in; or
- if it is required or authorised by law.



In the event we propose to use or disclose such personal information other than for reasons set out above, we will first seek your consent prior to such disclosure or use.

If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact us on the details set out at the bottom of this policy and we will ensure the relevant communication ceases. Any other use or disclosure we make of your personal information will only be as required by law or as permitted by the *Privacy Act 1988* or by this privacy policy or otherwise with your consent.

TYPES OF ORGANISATIONS TO WHICH WE MAY DISCLOSE YOUR PERSONAL INFORMATION

We may disclose your personal information to organisations outside of P&Cs Qld. Examples of organisations and/or parties that your personal information may be provided to include:

- related entities and subsidiaries of P&Cs Qld;
- third parties, such as trade suppliers, sponsors of P&Cs Qld or sponsors of events run by P&Cs Qld; and
- our contractors and agents, including but not limited to our professional advisors such as accountants, solicitors and auditors or other companies who assist us in providing our products and services to you.

Your personal information is disclosed to these organisations and/or parties only in relation to the goods or services we provide to you or for a purpose permitted by this privacy policy.

We take such steps as are reasonable to ensure that these organisations and/or parties are aware of the provisions of this privacy policy in relation to your personal information.

DATA QUALITY AND SECURITY

We have taken steps to help ensure your personal information is safe. You will appreciate, however, that we cannot guarantee the security of all transmissions or personal information, especially where the internet is involved.

Notwithstanding the above, we will take reasonable steps to:-

- make sure that the personal information we collect, use or disclose is accurate, complete and up to date;
- protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and
- destroy or permanently de-identify personal information if it is no longer needed for its purpose of collection.

However, the accuracy of personal information depends largely on the information you provide to us, so we recommend that you:



- let us know if there are any errors in your personal information; and
- keep us up-to-date with changes to your personal information (such as your name or address).

ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION

You are entitled to have access to any personal information relating to you which we possess, except in some exceptional circumstances provided by law. You are entitled to access and edit such information unless we are required by law to retain it or permitted to retain it in accordance with this privacy policy.

However, we may keep track of past transactions for our accounting and audit requirements. Furthermore, it may be impossible to completely delete your information because some information may remain as backups.

If you would like access or correct any records of personal information we have about you, you are able to access, update and correct that information (subject to the above) please contact us on the details set out at the bottom of this policy.

CONSENT

By using our website or by accepting the terms of one of our terms and conditions which refer to this privacy policy, you are agreeing to the terms of this privacy policy.

We reserve the right to modify our privacy policy as our business needs require. We will notify you of such changes (whether by direct communication or by posting a notice on our website), after which, your continued use of our products, services or website or your continued dealings with us shall be deemed to be your agreement to the modified terms. If you do not agree to our continued use of your personal information due to the changes in our privacy policy, please contact us via the details set out at the bottom of this document.

PRIVACY POLICY COMPLAINTS AND ENQUIRIES

Privacy Compliant Resolution: If you have any concerns or complaints about the manner in which your personal information has been collected, used or disclosed by us, we have put in place an effective mechanism and procedure for you to contact us so that we can attempt to resolve the issue or complaint.

In order to resolve a complaint, P&Cs Qld:

- will liaise with you to identify and define the nature and cause of the complaint;
 - may request that you detail the nature of the complaint in writing;
 - will keep you informed of the likely time within which we will respond to your complaint;
 - will inform you of the legislative basis (if any) of our decision in resolving such complaint;
- and



- keep a record of the complaint and any action taken in the Register of Complaints and Actions.

Our Contact: We can be e-mailed at admin@pandcsqld.com.au or call us on 1800 218 228 and we will attempt to resolve the issue or complaint.