

PRIVACY POLICY

Summary

Seekwine Pty Ltd (ACN 616 357 932) (together, **us, we**) respects your privacy.

The purpose of this Privacy Policy is to explain:

- the application of this Privacy Policy
- the kind of information we collect about you and why we collect it
- how we collect and store that information
- how we may disclose that information
- how you can access and correct the information we hold about you
- when we may use your information to contact you
- our use of cookies to collect information, and how you can control or delete these cookies

Application of this Privacy Policy

This policy informs you of the steps we take to protect your privacy.

While we have not opted into being treated as an organisation for the purpose of the *Privacy Act 1988* (Cth) (**Privacy Act**), the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth) and the Privacy (Credit Reporting) Code 2014 (**Privacy Code**), we are committed to protecting your privacy.

This policy deals with how we collect, manage, store and disclose your “personal information”. Certain parts of this Privacy Policy also apply to “credit related information” and “sensitive information”. These terms are discussed below.

What is personal information, sensitive information and credit related information

We collect personal information in the course of our business dealings with you. The term “personal information” is defined by the Privacy Act. Personal information is information or an opinion that can be used to identify you. This might include personal details like your name, address, date of birth, other contact information like your email address and phone number and financial information like your credit card number or bank details.

“Sensitive information” is a type of personal information. Sensitive information can include information like your racial or ethnic origin, health, political opinions, membership of a political association, professional or trade association or trade union and criminal record.

Sometimes, the personal information we collect from you may constitute credit related personal information. “Credit related personal information” is defined by the Privacy Code. Credit related personal information can include information about your identity, repayment history information, whether you have overdue payments, whether you have ever been the subject of credit related court proceedings or insolvency proceedings and whether, in the opinion of a credit provider, you have committed a serious credit infringement.

This policy applies to personal information, sensitive information and credit related information collected by us, whether we have asked for the information or not.

The kind of personal information we collect and hold

The personal information and credit related information we collect and hold will depend on our dealings with you.

The different kinds of personal information we collect and hold include:

- names;
- contact details, including address, phone number and email address;
- signatures;
- dates of birth;
- employment details;
- bank account details;
- financial details;
- tax file number;
- opinions about our services, products and staff; and
- any information sent to us through correspondence.

The different kinds of credit related personal information we collect and hold include:

- the personal information listed above;
- applications for commercial credit, the type and amount of that credit and the fact that we have accessed consumer credit information to assess a credit application;
- that we and other credit providers have provided credit to an individual, payments owed to us in connection with credit provided to an individual;
- whether in our opinion, or the opinion of another credit provider, an individual has committed a serious credit infringement;
- information about court proceedings, personal insolvency information and other credit related publicly available information;
- whether an individual has entered into an arrangement with us or another credit provider in connection with credit provided to the individual;
- scores, ratings, summaries, evaluations and other information relating to an individual's credit worthiness; and
- certain administrative information relating to credit, such as account and customer numbers.

Generally, we do not collect sensitive information. If we think any sensitive information is reasonably necessary to allow us perform our functions or activities we will ask for your consent to collect this information.

If you apply for employment with us, we will collect sensitive information from you on our induction form. This sensitive information is required by us to assess whether you have any medical conditions that might impact on your ability to safely perform the role you have applied for. By providing us with this information and signing the induction form, you consent to us using that information for the purpose of assessing your employment application and, if you are employed, for purposes in connection with your ongoing employment with us.

For ease of understanding and reading this policy we will refer to personal information and credit related personal information together as “personal information”.

Why we collect personal information

We collect personal information for a number of reasons including:

- to communicate with you;
- to deliver products or services to you;
- to assess a credit application by you;
- to assess your creditworthiness;
- to decide whether to withdraw credit facilities;
- to notify other credit providers of a default by you;
- to exchange information with other credit providers as to the status of your credit account, if you are in default with other credit providers;
- to better understand your requirements and preferences and improve our products and services;
- to recruit employees and engage contractors and subcontractors;
- to perform other administrative functions, like the daily operation of your credit facility;
- to comply with legal requirements; and
- for purposes directly related to any of the above.

How we collect personal information

We will collect personal information from you in a number of ways. We will collect personal information when you place an order, provide feedback to us, apply for or engage in employment or otherwise deal with us.

We will collect information directly from you. However, in certain circumstances we will also collect personal information from third parties, like dealers, contractors, retailers or recruitment agencies if you are dealing with us through this the third party, for example if you are referred to us through a dealer. We might also obtain information from publicly available sources like government websites.

If you have applied for credit with us, we may collect credit related personal information from credit reporting bodies and other credit providers. We will not share this information with any party.

If you do not wish to provide personal information to us you have the option of remaining anonymous or use a pseudonym. However, in most situations we will be unable to provide you with a product or service if you do not provide us with your personal information. We need to have your details in order to supply our products to you, at your address. We are also unable to provide you with credit if you do not supply us with all the information we request from you.

If you have concerns about your rights to anonymity or the use of a pseudonym, you can contact our Privacy Officer on a no-names and confidential basis.

How we store personal information

We store personal information digitally on our computer systems and computer servers. These systems and servers are used and hosted by us and are located in our office but are managed by third parties.

We also hold personal information in hard copy. Hard copies are stored in our office.

Only authorised personnel have access to our server and computer systems and our hard copy files. All of our server and computer systems are protected by password.

All of our employees who may come into contact with personal information are educated about the terms of our Privacy Policy.

We regularly update our anti-virus software in order to protect our computer systems and take steps, like engaging IT providers, to ensure that our computer systems and networks are secure.

How we disclose personal information

We may disclose your personal information to third parties for the following purposes:

- to provide the products or services you wish to use;
- to customise and promote our services which may be of interest to you;
- to provide technical support to you to use products; or
- if permitted or required by law.

As part of providing services to you, we will sometimes need to disclose your personal information to third parties who perform part of our services. This includes third party contractors, who we contract with to provide services to you.

We may share your information with companies that are related to us by common ownership (i.e. we have the same shareholders and directors). Each of our related entities will comply with the terms of our privacy policy, which is the same as their own.

We may also need to disclose your personal information our external service providers like delivery companies and IT service providers and our advisors, including our accountants and lawyers.

We will take reasonable and practicable steps to ensure third parties we deal with take steps to protect your privacy. All of our employees are required to maintain the confidentiality of any personal information held by us.

We will never sell your personal information to anyone.

We will never disclose your information to anyone overseas, except if we are required to do this by law.

Applying for and employment with Us

If you submit an application or register interest for employment with us, we will collect personal information from you. If your application for employment with us is unsuccessful, we may retain this personal information to assess your suitability for another role with us. If you do not want us to retain personal information about you, please contact our Privacy Officer.

Destroying personal information

We will destroy, or take steps to de-identify, personal information when this is no longer required by us. We generally destroy information on an annual basis, using a secure third party provider.

Access and correction of personal information

We will take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, up-to-date and complete. We will also take reasonable steps to protect personal information that we hold from misuse, interference, loss, unauthorised access, modification or disclosure.

You have the right to request access to personal information that is held by us about you. You also have the right to request correction of any of your personal information that we hold. We will take reasonable steps to make appropriate corrections to your personal information so that it is accurate, complete and up to date.

If you would like to access, or correct, your personal information please write to our Privacy Officer using the contact details set out below. Please make sure you clearly identify the information or correction requested.

In some cases, we may refuse to provide you with access to your personal information. We will only do this if an exception in the Privacy Act applies. If access is refused, we will write to you and explain why.

Complaints

If you have any questions or complaints about the way we have handled your personal information you can contact our Privacy Officer as follows:

By email: admin@harveyriver.com.au

By mail: Lot 20, Third Street, Harvey WA 6220

Attention: Privacy Officer

We take all enquiries seriously and will attend to your question or complaint promptly.

Direct Marketing

We may use your personal information to send marketing materials to you if the marketing material is related to the purpose for which we collected that information.

We will ask for your consent before we use your personal information for marketing purposes if we have not collected that personal information directly from you or where sensitive information is involved.

If you receive marketing offers from us and do not wish to receive them in the future, please contact us.

Internet cookies

An internet cookie is a data file that may be placed on the computer of an internet user during a visit to our website. Cookies are necessary to allow our website and your computer to interact effectively and to enhance security. Cookies can record information about your visit to assist us in better understanding your needs and requirements. Our website uses cookies, tracking pixels and related technologies. Cookies are small data files that are served by our platform and stored on your device. Our site uses cookies dropped by us or third parties for a variety of purposes including to operate and personalise the website.

If you would like to access our website but do not wish to receive any cookies, you should set your browser settings to refuse to accept cookies. This may mean that you may not be able to access our website or parts of it. The following sections of this policy contain further information on how we use cookies.

Cookies may also be used to track how you use the site to target ads to you on other websites. To opt out of this you can visit the DAA opt-out site www.aboutads.info or the Network Advertising Initiative opt-out site at networkadvertising.org/choices, or for those in Europe, the EDAA opt out site at youronlinechoices.eu.

Remarketing

We use 3rd party vendor re-marketing tracking cookies, including the Google Adwords tracking cookie. This means we will continue to show ads to you across the internet, specifically on the Google Display Network (GDN). As always, we respect your privacy and are not collecting any identifiable information through the use of Google's or any other 3rd party remarketing system.

The third-party vendors, including Google, whose services we use – will place cookies on web browsers in order to serve ads based on past visits to our website. – Third party vendors, including Google, use cookies to serve ads based on a user's prior visits to your website. This allows us to make special offers and continue to market our services to those who have shown interest in our service.

You can opt out of this feature by visiting the following link: [Google Analytics opt-out browser add-on] <https://tools.google.com/dlpage/gaoptout/>

Google Analytics Demographics & Interest Reporting

Our website uses cookies to facilitate the sampled reporting of demographics and interests of its visitors within Google Analytics. Our website will not merge or facilitate the merging of personally-identifiable information with non-personally identifiable information previously collected from Display Advertising or divulge this information to any third parties.

This data is used to provide better services and more relevant content to our users based on demographic and interest data.

You may opt out of Google's use of cookies by visiting the Ads Preferences Manager. Also, you can opt out of other third-party vendor's use of cookies by visiting the Network Advertising Initiative opt-out page, set out above.

Updates to this Privacy Policy

We will review and update this Privacy Policy from time to time. If we make any changes to this Privacy Policy, we will upload them to our website.

This Privacy Policy will be available to anyone on request, whether at our office or on our website. If you would like a hard copy, please contact our Privacy Policy.

For more information about privacy issues, you can visit the OAIC website at <http://www.oaic.gov.au>

Policy last updated July 2017.