

Bawdens Rural Trading Pty Limited

ACN 100 840 828

Privacy Policy

1. Privacy Act

- 1.1 This Privacy Policy outlines how Bawdens Rural Trading Pty Limited (**'we'**, **'us'** or **'our'**) uses and manages personal information.
- 1.2 We are bound by the Australian Privacy Principles (**'Principles'**) contained in the *Privacy Act 1988* (Commonwealth) (**'Privacy Act'**). We will collect, use and retain personal information in accordance with the Principles.
- 1.3 This Privacy Policy applies to personal information collected, used or retained by us (and our authorised agents). It applies to all information we collect and hold about you, which may be obtained by:
 - 1.3.1 collecting it from you personally;
 - 1.3.2 collecting it from you when you disclose personal information to us in any credit or prepayment arrangement application you may make with us; and
 - 1.3.3 us processing transactions to which you are a party.
- 1.4 When we collect personal information from you, we may advise a specific purpose for collecting that personal information, in which case we will handle your personal information in accordance with that stated purpose.
- 1.5 By providing personal information to us, you consent to our collection, use and disclosure of that information on the terms of this Privacy Policy and any other contractual or other arrangements (if any) that may apply between us.

2. What personal information we collect

- 2.1 The type of personal information that we collect and hold includes (but is not limited to) your personal and business contact details, and in some instances, financial information. We may also hold information about any goods or services you acquire from us, details of returns, any warranty claims made in connection with goods or services acquired from us, and any other personal information that you volunteer to us.
- 2.2 We do not collect (or, if it is provided by you to us, retain) any sensitive information about you.

3. How we collect, hold, use and disclose personal information

3.1 Collecting personal information

- 3.1.1 We collect personal information directly from you, in person or through a credit or prepayment arrangement application form. We may also collect your personal information from third parties (such as market research companies acting on our behalf) that have collected personal information from you. Where we collect personal information from third parties, we will

take reasonable steps to notify you or otherwise ensure you know we are collecting personal information from you, and the circumstances of its collection.

3.1.2 In order to assess an application for credit and, or prepayment arrangements, we may disclose your personal information to credit reporting agencies and other third parties.

3.1.3 There may be a range of consequences if you fail to provide personal information requested by us. For example, we may be unable to process your request for goods or services or communicate with you. The provision of that information by you is purely voluntary.

3.2 **Holding personal information**

3.2.1 We take active steps to ensure that your personal information is protected from misuse, loss, unauthorised access, modification or disclosure.

3.2.2 Specific security measures we employ include authorised user-only password protected access to computer records, internal procedures to protect physical documents and monitoring of our practices and systems to ensure the effectiveness of our security policies.

3.2.3 We will endeavour to destroy or de-identify your personal information as soon as it is no longer required by us (and as permitted by law).

3.3 **Using personal information**

3.3.1 From time to time, we will collect, use and disclose your personal information for a particular purpose ('**the primary purpose**'). We may use or disclose the personal information we hold about you for other purposes ('**secondary purpose**') if you consent to use or disclosure for the secondary purpose.

3.3.2 We may also use or disclose the personal information we hold about you for a secondary purpose, without specific consent, if the secondary purpose is something you would reasonably expect and is related to the primary purpose.

3.3.3 The following examples may assist. We generally collect, hold and use your personal information to:

- (a) maintain your account and contact details;
- (b) process transactions to which you are a party;
- (c) process and consider applications for credit and, or prepayment arrangements, including obtaining credit reports from credit reporting agencies or trade references as to your creditworthiness;
- (d) contact you to ask about your experiences with, or impressions of, our goods or services;

- (e) contact you from time to time to advise you of new goods, promotional offers, or services offered by us that we consider may interest you;
- (f) contact you about other matters relating to goods or services that you have acquired from us; and
- (g) engage in other activities where required or permitted by law.

3.3.4 We may use personal information to contact you for marketing and promotional purposes. You may request not to receive these communications by contacting our Privacy Officer (contact details for our Privacy Officer are set out in **paragraph 9** of this Privacy Policy). If you do not opt out, we will assume you have consented to receiving such communication from us.

3.3.5 There are no consequences for opting out of receiving our marketing and promotional communications except that you will no longer receive them, and you may elect to re-join our marketing list at a later stage if you wish.

3.3.6 Where we propose to use your personal information for another purpose other than as outlined above, we will seek your express consent prior to using your personal information for that purpose (unless we are required or permitted by law to do so without seeking your permission).

3.4 **Disclosing personal information**

3.4.1 We may disclose your personal information to:

- (a) our authorised agents, credit reporting agencies, contractors or subcontractors that provide administrative or promotional services (for example, mail processing businesses, printers, or market research companies or other service providers) and other third parties. We enter into contractual agreements with these organisations to ensure that information we disclose is used only for the limited purposes for which we have provided it; and
- (b) our related bodies corporate.

3.4.2 Where we propose to disclose your personal information for another purpose other than as outlined above, we will seek your express consent prior to disclosing your personal information for that purpose (unless we are required or permitted by law to do so without seeking your permission, for instance, when we are compelled to disclose personal information for certain law enforcement purposes).

4. **Access and correction of personal information**

4.1 You have the right to obtain access to any personal information we hold about you. You have the right to contact our Privacy Officer to request access to or correction of your personal information held by us (contact details for our Privacy Officer are set out in **paragraph 9** of this Privacy Policy). We will respond to your request for access or correction within 30 days from receiving your request.

- 4.2 We may require you to verify your identity before we allow you to access your personal information, for the protection of your privacy and the privacy of other individuals whose personal information we hold.
- 4.3 We may refuse to allow you to access or to correct your personal information if we are legally required or entitled to do so. If we do so, we will provide you with written reasons for the refusal (unless it is unreasonable to do so) and the options available to you to complain about our refusal.
- 4.4 If you lodge a request for access, we may provide you with access to your personal information in any of a number of ways (including, for example, supplying you with a copy or providing you with the opportunity to inspect our records).
- 4.5 We take reasonable steps to ensure that the personal information that we collect, use and disclose is accurate, up to date and complete. If we are satisfied that any personal information we hold about you is inaccurate, out of date or incomplete, we will amend our records accordingly.
- 4.6 We do not impose any fee on you to make a request to access personal information we hold. However, we may require you to pay a reasonable fee to cover the cost of verifying an application for access and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise you of the likely cost in advance.

5. **Dealing with us anonymously**

- 5.1 You may transact with us anonymously or by using a pseudonym, wherever that is reasonable and practicable.
- 5.2 Transacting with us anonymously or by using a pseudonym may not be possible if we are required or authorised by law to transact with customers only once their identity has been verified, or where it is impracticable for us to transact with customers without verifying their identity (for instance, when transacting using a credit account, purchasing prescribed goods of which we are required to maintain records of purchases, or where a customer will contract with a third party).

6. **Cross-border data transfer**

We operate only within Australia and will not provide your information to parties in any other country. We may however, from time to time, use web-based programs in relation to the management of our business records or for activities such as email server storage, which may be hosted overseas.

7. **Changes**

- 7.1 We reserve the right, as it may be necessary, to review, revise or make changes to this Privacy Policy, at any time.
- 7.2 You may request a copy of the current version of our Privacy Policy by contacting our Privacy Officer (contact details for our Privacy Officer are set out in **paragraph 9** of this Privacy Policy).

8. **Complaints**

8.1 If you would like further information about the way we manage personal information we hold, or wish to make a complaint if you believe that we may have breached the Principles, please contact our Privacy Officer in writing (contact details for our Privacy Officer are set out in **paragraph 9** of this Privacy Policy). We will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable.

8.2 If you are not satisfied with our decision, you may contact the Office of the Australian Information Commissioner ('**OAIC**') to lodge a complaint. The contact details of the OAIC are:

Post: GPO Box 5218, Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Fax: (02) 9284 9666

9. **Privacy Officer – contact information**

You may contact our Privacy Officer by:

Post: 26 Lipson Road, Tumby Bay SA 5605

Telephone: (08) 8688 2388