



Access Hardware Privacy and Credit Reporting Policy

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Credit Reporting Policy

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Access Hardware is committed to protecting your privacy and developing technology that gives you powerful and a safe online experience. This document sets out the policy of Access Hardware Pty Ltd (ABN 34 006 426 820), Access Corporate Services Pty Ltd (ABN 19 142 688 284), Access Hardware (TAS) Pty Ltd trading as Jacksons Security (ABN 36 080 370 109) and trading as Access Hardware, Access Locksmiths (TAS) Pty Ltd (ABN 65 131 987 570), Access Doors (TAS) Pty Ltd (ABN 30 145 480 771) trading as Fenton Doors, Access Entry Pty Ltd (ABN 84 602 327 024), and / or their successors, new and existing related bodies corporate (as defined in the Corporations Act 2001) of Access Hardware Pty Ltd, and assigns (as applicable) (referred to as “we”, “us” or “our”) relating to the privacy of your personal information (“**Privacy Policy**”).

This Privacy Policy sets out how we might collect, hold, use or disclose your personal information in accordance with the Australian Privacy Principles (“**APP’s**”) contained in the Privacy Act 1988 (Cth) (“**Privacy Act**”). By accessing and using the website at www.accesshardware.com.au (“the **Website**”) or providing us with your personal information by any other means, you consent to us collecting, holding, using and/or disclosing any of your personal information in accordance with this Privacy Policy.

To the extent that we offer products and services to individuals in the European Union and the United Kingdom, or otherwise monitor the behaviour of individuals in the European Union and the United Kingdom, this Privacy Policy also sets out how we comply with the European Union’s General Data Protection Regulation (“**GDPR**”). For the purposes of the GDPR, we are both a “data controller” and a “data processor” of personal information and are responsible for how personal information is collected and used.

Credit Reporting Policy: This is also our credit reporting policy for the purposes of Part IIIA of the Privacy Act and it sets out, where this is relevant to you, how we manage your credit information and credit eligibility information.

What kinds of personal information do we collect?

We only collect personal information (being information that identifies or could reasonably identify an individual) where we consider it to be reasonably necessary for one or more of our business functions or activities. Typically, we collect personal information about users of our Website and purchasers or potential purchasers of our products. We collect personal information in accordance with the APPs.

Generally, the types of personal information we collect and hold will depend on the type of dealings you have with us. This may include, but is not limited to, your e-mail address, name, username, home or work address or telephone number, sex, age, credit reports and related information and details regarding your membership of a professional or trade union. Some of this personal information may be considered ‘sensitive information’.

Note that our policy is to only collect your sensitive information where it is reasonably necessary for our functions or activities and either you have consented or we are required or authorised under law to do so. We also collect anonymous demographic information, which is not unique to you, such as your ZIP code, age, gender, preferences and interests.

We may collect personal information automatically through your use of the Website. This includes information we receive from devices you use when you use the Website, including web analytics. By way of example, personal information can include: your IP address, browser type, domain names, access times and referring web site addresses. This information is used by us for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of our Website.

Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through our public message boards, this information may be collected and used by others. Note: We do not read any of your private online communications.

Links to other websites

We encourage you to review the privacy statements of websites you choose to link to from our Website so that you can understand how those websites collect, use and share your personal information. Unless the website is one of our products, we are not responsible for the privacy or security practises of the owners of those websites.

How we collect your personal information

We will only collect your personal information by lawful and fair means. We will generally collect personal information directly from you. When you visit our Website, we collect information which you provide voluntarily (e.g. by creating a user account). We may also collect your personal information when you apply for credit with us, when you place an order with us, call us, email us, or participate in competitions, surveys or promotions.

Sometimes, we may collect information through third party service providers (including marketing agencies, credit reporting agencies, public sources, or promotional partners) or distributors or retailers of our products. We may also collect personal information automatically through your use of the Website. We use tracking technologies such as cookies, web beacons and other web analytics software or services to collect information regarding your interaction with the Website.

You may choose to communicate with us anonymously or using a pseudonym where it is practicable to do so, however in some circumstances doing so may also affect our ability to provide you with products relevant to your needs.

We may keep records of unsolicited personal information (personal information we receive that we have taken no active steps to collect) if the information is reasonably necessary for one or more of our functions or activities. If not, it is our policy to destroy the unsolicited information or ensure that the information is de-identified, provided it is lawful and reasonable to do so.

Do you have to provide personal information?

You can refuse to provide personal information or choose not to identify yourself, deal with us on an anonymous basis or use a pseudonym. However, a refusal may mean that the service you requested is not provided or an application you submit to us is forfeited or declined.

How we keep your personal information

We take reasonable steps to prevent the loss, unlawful use or disclosure of the personal information provided to us. We store personal information on secure servers that are managed by us and our service providers, and occasionally hard copy files that are kept in a secure location. Personal information that we store is subject to security and access controls, including username and password authentication and data encryption where appropriate. When personal information (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol. We cannot guarantee that personal information will be protected against unauthorized access or misuse and we do not accept any liability for the improper actions of unauthorized third parties.

We will retain your personal information for as long as necessary to fulfil our obligations to you, to protect our legal interests, to comply with an Australian law or as otherwise stated to you when we collected your personal information. Once we are no longer required to retain your personal information, we will take reasonable steps to destroy your personal information or to ensure that your personal information is de-identified.

Use and disclosure of your personal information

We collect and use your personal information to operate our Website, deliver our products and services you have requested, to determine if we will accept your credit application and any guarantee provided and improve our product offerings and Website. We also use your personal information to inform you of other products or services available from us and our related entities. We may also contact you via surveys to conduct research about your opinion of current products and services or of potential new products and services that may be offered.

We do not sell, rent or lease your personal information to third parties. We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your personal information is not transferred to the third party. In addition, we may share data with trusted partners (for example, our related bodies corporate, contractors, subcontractors, our professional advisers, regulatory and government authorities or third party adviser who assist us with the purpose for which we collect or use the personal information) to help us perform statistical analysis, send you emails or postal mail, provide customer support, or arrange for deliveries. We require such third parties to use your personal information only to provide services to us, and they are required to maintain the confidentiality of your information. We may also disclose your personal information to credit reporting agencies.

We may also use and disclose your personal information with your consent, where we are authorised or required to do so by law, where reasonably necessary to assist a law enforcement agency and otherwise as permitted under the APPs.

We do not use or disclose sensitive personal information without your explicit consent.

If the ownership of all or part of our business changes, we may transfer your personal information to the new owner.

Use of cookies

Our Website uses “cookies” to help personalize your online experience and we may store some of this information on your computer. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you personalize Access Hardware pages, or register with Access Hardware site or services, a cookie helps Access Hardware to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Access Hardware Web site, the information you previously provided can be retrieved, so you can easily use the Access Hardware features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Access Hardware services or Web sites you visit.

Direct marketing

If you provide us with your personal information and you consent to receiving direct marketing communications from us, you authorise us to send you promotional messages and materials related to Access Hardware’s products and services, unless you submit a later request not to receive direct marketing communications.

Our electronic direct marketing messages and materials will contain a prominent statement (including, for electronic messages, a functional unsubscribe facility) that you may request not to receive direct marketing communications in the future.

If you do not wish to receive marketing or other communications from us, please submit a request not to receive direct marketing communications or use the unsubscribe facility provided in the most recent communication from us or contact us on the details provided.

How can you access and correct your personal information?

You generally have the right to access your personal information free of charge, subject to some limitations contained in the Privacy Act 1988, by contacting us on the details below.

The APPs set out some circumstances in which we are not required to provide you with such access. If you ask for your personal information and any of these circumstances exist, you may be given access to the personal information in a way that is permitted under the Privacy Act 1988.

To protect personal information held by us, you may need to confirm your identity before access to your personal information is granted. It may take a little time to process your application for access and retrieve information from storage (if applicable).

We encourage you to update us so that we have accurate, current and complete information. You may correct any errors or request that we delete all or some of your personal information. You may also submit a request not to have any further contact from us.

Resolving your privacy issues

If you have a complaint in relation to the collection, use or and disclosure of your personal information, please contact the Access Hardware Privacy Officer via the details provided below. The Access Hardware Privacy Officer will review all complaints received and respond to each complainant upon due consideration (which may require further information to be provided).

Will your personal information be disclosed overseas?

Some of our related entities, partners and service providers (or the services they provide) may be based outside Australia (including in the European Union, the United Kingdom or the United States of America). By providing us with your personal information, you acknowledge that your personal information may be used, stored and disclosed overseas, including in jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. To protect your personal information we take care to work with entities, partners and service provider who are based in countries that provide adequate levels of data protection, or we otherwise take steps to ensure that your personal information receives adequate levels of data protection in the jurisdictions in which it is processed in accordance with all applicable privacy laws (including the GDPR).

Users based in Europe

If you access our products or services from Europe, you may have additional rights under the GDPR in relation to the handling of your personal information.

When you access the Website, we may monitor your activity using automated processes, including for the purposes of counting usage of our Website and webpages and providing you with more tailored and relevant products and services.

In certain circumstances, in addition to the rights listed in the 'How can you access and correct your personal information' section, you have also have a right to:

- request a copy of personal information that you have provided to us, in a commonly used electronic format;
- request that we delete any personal information that we hold about you, subject to any legal obligations we have to retain your personal information; and
- withdraw your consent to the processing of the personal information that we hold about you. Once you have withdrawn your consent, we will no longer process your personal information for the purpose(s) you originally agreed to, unless we are required to do so by law. This will not affect the lawfulness of any processing of personal information based on your consent before its withdrawal.

Where your personal information is transferred outside Europe, it will only be transferred to countries that have been identified as provide adequate protection for personal information, or

to a third party where we have approved transfer mechanisms and/or contractual obligations in place to protect your personal information.

Changes to this statement

Access Hardware will occasionally update this Privacy Policy to reflect company and customer feedback. Access Hardware encourages you to periodically review this Policy to be informed of how Access Hardware is protecting your information.

Contact information

Access Hardware welcomes your comments, concerns and complaints regarding this Privacy Policy. If you believe that Access Hardware has not adhered to this Policy, please contact Access Hardware's Privacy Officer at admin@accesshardware.com.au or alternatively write to: Access Hardware Privacy Officer 74-92 Gracie Street, North Melbourne VIC 3051. We will use commercially reasonable efforts to promptly determine and remedy the problem.

Credit Reporting Policy

We may provide credit as contemplated in the Privacy Act to our customers in connection with our products and services (for example, credit term accounts). We therefore may collect credit information and credit eligibility information about you as set out in the Privacy Act 1988. Our Credit Reporting Policy sets out how we manage that information. This credit reporting policy relates to Access Hardware Pty Ltd (ABN 34 006 426 820) and to our related entities that are deemed to be credit providers or affected information recipients for the purposes of the Privacy Act 1988 (Cth).

What credit information and credit eligibility information does Access collect?

We may collect credit information about you in connection with application for credit and in any of the circumstances relating to other personal information detailed in the "What kinds of Information do we collect?" section of our Privacy Policy.

Credit information includes

- (a) identification information;
- (b) information relating primarily to your credit related dealings with us and covers various types of information that can be collected by Credit Reporting Bodies ("**CRBs**") that report on consumer credit worthiness;
- (c) financial information relating to directors, partners, trustees, sole traders and any person who acts or proposes to act as a guarantor;
- (d) basic information about your credit account;

- (e) historical solvency information of directors, partners, trustees, sole traders or managers associated with a business applying for credit
- (f) details about information requests we make about you to CRBs,
- (g) information about certain overdue payments, serious credit infringements; and (h) various publicly available information like bankruptcy and credit-related court judgements.

Credit eligibility information is information equivalent to the types set out above that are generally obtained from CRBs. This information relates primarily to your dealings with other credit providers (i.e. banks, other financial institutions and entities that may provide you with credit in connection with their goods or services). It may also include certain credit worthiness information that is derived from data collected from a CRB or other credit reporters.

We store and secure your credit information and credit eligibility information in the manner described in the “How we keep your Personal Information” section of our Privacy Policy.

How does Access use and disclose your credit information and credit eligibility information?

Credit information and credit eligibility information disclosed to us is principally used for in connection with your application for credit to assess that application and for the ongoing management of a credit account and otherwise as permitted by law. This may involve any of the following uses:

- (a) processing credit-related applications (including assessing your credit worthiness and includes obtaining consumer and commercial credit reports from CRBs) and managing the ongoing credit that we provide;
- (b) assisting you if we think you may be at risk of default;
- (c) collecting amounts you may owe us in relation to such credit and dealing with serious credit infringements;
- (d) providing or exchanging personal information with any person whose name is provided to us in connection with your application for credit (including trade references);
- (e) internal management purposes;
- (f) participating in the credit reporting system and providing information to CRBs as permitted by the Privacy Act 1988;
- (g) dealing with complaints or regulatory matters relating to credit or credit reporting; and
- (h) as required or permitted by the Privacy Act 1988 or another law.

We may disclose your credit information to CRBs who may then include that information in credit reports they provide to other credit providers to assist those credit providers assessing your credit worthiness.

We may also use and disclose your credit information for other purposes and in other circumstances as set out in the “Use and disclosure of personal information” section of our Privacy Policy, when permitted to do so by the Privacy Act 1988.

In some cases, the people to whom we may disclose your credit information or credit eligibility information may be based outside Australia – for more information please see the details under the “Will your information be disclosed overseas?” section of our Privacy Policy.

Credit reporting bodies to whom we may share credit-related personal information include:

- Dun and Bradstreet (Australia) Pty Ltd, www.checkyourcredit.com.au PO Box 7405, St Kilda Road, Melbourne, VIC 3004
- Veda Advantage Information Services and Solutions Limited, www.veda.com.au PO Box 964, North Sydney, NSW 2059
- Experian Australia Credit Services Pty Ltd, www.experian.com.au P.O. Box 1969, North Sydney, NSW 2060

These CRBs are each required to have a policy which explains how they will manage your credit-related personal information. To view the policy of any of these CRBs please visit the relevant CRB’s website and follow the “Privacy” links, or you can contact them directly for further information.

Accessing and correcting your credit information or credit eligibility information

If you wish to access or correct errors in any of your credit information or credit eligibility information that we hold, please contact us using the contact details set out in the “Contact Information” section of our Privacy Policy.

We will assist you with accessing and correcting any of your credit information or credit eligibility information that we hold as described in the “How can you access and correct your personal information?” section of our Privacy Policy. There is no charge to make a request for access but we may apply an administration fee as permitted by the Privacy Act 1988 for providing access in accordance with your request.

How do you make a complaint?

If you think that we have not complied with Part IIIA of the Privacy Act or with the Credit Reporting Privacy Code (which regulates credit reporting) you can make a complaint by using the contact details set out in the “Contact Information” section of our Privacy Policy.

We will acknowledge your complaint in writing within 7 days of receipt of your complaint and aim to investigate and resolve complaints within 30 days of receiving it. If we need more time, we will notify you about the reasons for the delay and seek to agree a longer period with you (if you do not agree, we may not be able to resolve your complaint). We will notify you of the outcome of our investigations in writing, including details of how to make a complaint if you are not satisfied with Access’ decision.