

# TSWG Privacy Policy

## 1 About this policy

The System Works Group Pty Ltd (ABN 49 010 514 557) (TSWG) ('we', 'us', 'our') understands the importance of, and is committed to, protecting your personal information. We comply with the Privacy Act 1988 (Privacy Act). We are bound by the Australian Privacy Principles (APPs) which regulate how we may collect, use, disclose and store personal information, and how our customers and suppliers and stakeholders ('you') may access and correct personal information we hold about you.

### Purpose

The purpose of this privacy policy is to:

- clearly communicate how we deal with personal information
- enhance the transparency of TSWG operations
- give a better and more complete understanding of the sort of personal information that TSWG holds, and the way we handle that information

### Changes to this privacy policy

We may change this privacy policy from time-to-time. The updated privacy will be posted on our website, with the date of the update shown.

### Who to contact

If you have any questions, concerns or complaints about this privacy policy, or our use of your personal information, please contact the Privacy Officer using the contact details provided below. You can also contact the privacy officer if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, the Privacy Officer will respond to you as soon as possible.

You may also lodge a complaint with the Office of the Australian Information Commissioner by telephone: 1300 363 992 or email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

#### **TSWG Privacy Officer**

Tel: +617 3640 4800

Email: [privacy@tswg.com.au](mailto:privacy@tswg.com.au)

## 2 Information we collect about you

We collect information about you that we reasonably need for our business functions and activities. Our business functions and activities include:

- Providing you with TSWG information, products and services – these are described generally on our website, social media sites, our corporate brochures, advertising, letters and emails and communications to customers, suppliers and business partners
- activities in support of those functions including administration, employment, management, marketing, contracting, online and mobile marketing, IT, legal, security, customer support, finance (including credit control) and human resources
- marketing, sales, support and development of IT products and services
- activities we plan for the future including new ways of communicating, new products and services, new business models and new businesses

Generally we collect the following personal information about you:

- your name
- your contact details including residential or business address, telephone number and email address
- company details (if applicable)
- drivers licence number
- date of birth

We may combine your personal information above with other information about you, including sensitive information, for example:

- if you login to our website we may collect details about your user name, site usage and products and services you may be interested in
- if we provide you with free access to a service (example an app), we may collect details about you including your name, sites visited, location, preferences, mobile device information (MAC Address and other metadata)
- we may collect information and data about you from third parties and publicly available sources (such as Facebook)
- we may combine information and data about you from several sources to make up a composite or persona regarding your likely consumer behaviour
- if your business or your employer supplies us with products or services, or if your business or employer distributes, sells or services our products, we collect information about your trading with us (for example the products and services you buy or sell or the products and services you provide), your trading history and account history (including credit card details)
- if you apply for a position with us, we collect information to help us decide your application, including your contact details, date of birth, work history, academic history, referees, tax file number, medical and relationship status and similar details

- if you are an employee, we may collect details on your performance of your duties in your role, with your consent (if we are required by law to have your consent)
- if you request information from us (for example about a product or service) or register a complaint, we collect information about your request or complaint
- if you enter a promotion or competition, visit us at an event or enquire about TSWG, we may collect your contact details so that we can follow up on your enquiry or interest by sending you marketing material

If you submit a credit application to us we collect certain other types of personal information (including information contained in a consumer or commercial credit report about you) including:

- information about your credit history, including information about your past experiences with us and other credit providers
- the kinds of credit products that you have sought and obtained in the past
- information about your consumer credit payments overdue for at least 60 days and for which collection action has started
- advice that payments that were previously notified to a Credit Reporting Body as overdue are no longer overdue
- publicly available information about your credit worthiness
- an opinion of a credit provider that you have committed a serious credit infringement in relation to credit provided by that credit provider
- we may also derive information about you from consumer or commercial credit reports about you, including:
  - information which assists us to assess your suitability for credit
  - the likelihood of you being able to meet your commitments to us

We record this information (personal information) in our database whilst we deal with you. We will remove this information from our database when we have no further need to keep a record of it, except if we are required to keep it by law (for example, for tax or for superannuation purposes).

### 3 How we collect information about you

#### How do we collect personal information?

We collect personal information directly from you. We may record your contact details when you call us, when you register and login to our website, when you purchase a product or service, if you use one of our free or paid services (example app) if you are a customer or supplier, when you fill out an application form (including a credit application form) when you participate in a transaction, when you provide your contact details via web, mobile or email or when you ask us for information or request something from us.

Sometimes we collect personal information about you from another person or business, or from a publicly available source. For example:

- our service providers may provide us with your personal information from websites, social media sites, mobile, other technology based sources, location based sources and composites of any of these sources
- your employer may give us your details in relation to a supply or sales contract or provision of a product or service;
- we may get you details from a publicly released tender;
- an employment service may send us your resume
- if you make a credit application and also where you carry on business with us on credit terms, we may obtain information about you from credit reporting bodies and other credit providers
- if you enter a networking event, promotion or competition organised by us, we may be given your name and contact details by the promoter of the event

We use lawful and fair means to collect your information. We will collect personal information about you from another person or from a publicly available source only if it is unreasonable or impracticable to collect it directly from you, and we will take reasonable steps to inform you that we have collected your personal information. Those reasonable steps may include informing you through this privacy policy.

### Unsolicited information

If we receive personal information about you that we have not requested, and if we determine that we could not have lawfully collected that information under privacy law if we had requested it, we will destroy or de-identify the information, if it is lawful and reasonable to do so. If we collect your personal information in an unsolicited manner, we take reasonable steps to inform you of such collection and also how we use, disclose and secure your personal information. Such reasonable steps may include referring you to this privacy policy.

## 4 Do I have to provide you with my personal information?

You can deal with us anonymously (without giving us your name and contact details) or by using a pseudonym (a name that does not include your real name, for example an email address or a user name that you use in an online forum (nickname)).

If you choose to deal with us anonymously or using a nickname, we can give you general information about our products and services, and you may be able to purchase products and services from us for cash or participate in any online forum we provide, but there are some things we cannot do, for example:

**If you do not give us your personal information, there are certain things we cannot do, including give you information about your dealings with us as a customer or supplier, potential employee, deal with a complaint you may have, provide you with a service or deliver a product or service to you at an address. You cannot attend one of our networking events, or enter into one of our promotions anonymously or using a nickname.**

You can deal with us using a nickname together with your real name and contact details. If you choose to deal with us in this way, we may collect your personal information together with your nickname. When you identify yourself to us using your nickname only, we can deal with you only as described above. We may ask you to provide proof of your identity if you use a nickname.

## 5 Why we collect personal information about you (purpose of collection)

We collect and record personal information about you so that we can carry out our functions and activities described above. The primary purposes for which we collect your personal information include:

- so that we can provide our products and services to you
- so that we can administer our dealings with you (and your employer if applicable), to provide you with information and to respond to any requests that you may have (for example, so that we can administer and provide you with project information, or IT support information)
- so that we can provide services to our clients
- so that we can assess and process a credit application made by you or your business, establish, provide and administer your credit account, and collect overdue payments
- so that we can function efficiently as a business, for example, we may collect your personal information for research, marketing, for efficiency purposes or so that we can offer new products, reconcile transactions, or if you are a customer or supplier so that we can record your dealings with us
- so that we can decide whether to employ or contract with you
- so that we can comply with agreements we have entered into with our suppliers and customers

We also collect your personal information for certain secondary purposes that are related to the primary purposes outlined above. Secondary purposes may include so that we can run our business

efficiently, for example, so that our advisors can provide us with customer research, or so that we can use technology to automate our business and to understand how our business is performing, to allow us to operate efficiently and to lower costs by outsourcing services (such as collecting or paying money) and making our processes more efficient. Other secondary purposes may include so that we can sell or transfer our business or merge with another business.

## 6 Disclosure

### Who do we disclose your personal information to?

We do not use or disclose your personal information for a purpose other than:

- a purpose set out in this privacy policy (primary or secondary purpose above)
- a purpose you would reasonably expect
- a purpose required or permitted by law
- a purpose otherwise disclosed to you to which you have consented

Depending on the circumstances, we may disclose your personal information to other people including one or more of the following:

- service providers including agents, contractors, IT, security, legal, accounting, research, credit, credit reporting bodies, marketing, insurers, financial institutions, debt collection agencies and others
- service providers including contractors who aggregate your personal information and provide context and location data about your consumer behaviour
- advertisers who sell products and services that we think you will be interested in
- other credit providers, to assist them with assessing a credit application they have with you, or to ensure that the information about you that we handle is correct
- credit reporting bodies in order to obtain credit reports and also for the purpose of dealing with defaults on your credit account and serious credit infringements
- if you are an employee or contractor we may disclose your personal information to other employees, management and contractors;
- our affiliate companies and related companies
- government, regulatory and law enforcement authorities, where we are required to or permitted to by law
- your employer, if you are an employee of a subcontractor or contractor
- to prevent or investigate any fraud or crime (or a suspected fraud or crime)

We take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations with respect to the protection of your personal information.

### Disclosure overseas

We may disclose your personal information to an overseas service provider, for example a freight provider, a cloud data centre or a customer information call centre. Our overseas service providers may be located Europe, the United States, Asia or South America.

If it is not practicable or reasonable for us to gain your consent to disclose your personal information to an overseas service provider, we will take reasonable steps to notify you of the specific countries where we disclose your personal information. We will take reasonable steps to ensure that the overseas services provider is bound by privacy and confidentiality obligations.

## 7 Access to your personal information

You may request access to the personal information that we hold about you by using the contact details provided above.

We will deal with your request for such access within a reasonable time. If we refuse access, we will provide you with a written notice which sets out the reasons for the refusal and the relevant provisions of the Privacy Act that we rely on to refuse access.

We may recover reasonable costs in relation to a request for access to personal information.

### Accuracy and correction

We take reasonable steps to make sure that the personal information we collect is accurate, up-to-date and complete. We take reasonable steps to make sure that the personal information we use or disclose is accurate, up-to-date, complete and relevant. Where we believe that the personal information we hold is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information.

Where we believe that the information we hold is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information and to notify that correction to third parties at your request. You may also request that we correct information that we hold about you, by using our contact details above.

We will take reasonable steps to correct the information within a reasonable time. However, if we do not agree with the corrections you have requested, we are not obliged to alter your personal information, but we will give you a written notice which sets out the reasons for our refusal, the mechanisms available to complain about the refusal and the relevant provisions of the Act that we rely on to refuse correction. You can also ask us to associate a statement with the relevant information that puts your view that it is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will not charge you for making a correction request, for correcting your information or for associating a statement with your information.

## 8 Security

We hold your personal information in paper-based and electronic files. We will take reasonable steps to ensure that your personal information which is kept in our files is protected from:

- misuse, interference and loss
- unauthorised access modification or disclosure

This means that, in respect of our paper-based files, we maintain various security systems on our premises, and in respect of electronic files, we (or our service providers) maintain secure electronic network systems.

When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we ensure that it is destroyed or de-identified.

### Social media and web

This section explains how we handle personal information collected from social media sites, mobile and websites. If you have any questions or concerns about transmitting your personal information via the internet, you may contact us using the contact details provided above, as there are other ways for you to provide us with your personal information.

### Visiting our websites and social media sites

If you visit our social media or websites, we will collect information about your visit, such as:

- the time and date of the visit
- any information or documentation that you download
- your browser type
- your IP address
- your MAC address

#### *Cookies*

A "cookie" is a small text file which may be placed on your internet browser and which we access each time you visit a web or mobile site. We use cookies for security and to build up a picture of the sites, products and services you prefer, so that we can then provide you with personalised advertising, products and services.

#### *MAC Addresses*

When you download and install an app, we may collect the MAC address of your device (mobile phone or tablet) and other data and metadata. We then use that data to understand your preferences, and to provide you with advertising for products and services we think you may be interested in at a convenient time and place.

### *Email*

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so.

### *Security*

We make reasonable efforts to ensure that the most up-to-date security measures are used on our web and mobile sites to protect your personal information. Any data containing personal information which we transmit via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

### *Links on our website*

Our website may contain links to third party websites. We advise that the terms of this privacy policy do not apply to external websites. If you wish to find out how any third parties handle your personal information, you will need to obtain a copy of their privacy policy.

## 9 Marketing

We may use your personal information, including your contact details, to provide you with information about products and services, including those of third parties, which we consider may be of interest to you. We may do this, even if you are on the Do Not Call Register.

We may also provide your details to other organisations for specific marketing purposes, including to build a profile of your consumer behaviour.

You may opt out at any time if you no longer wish to receive marketing information. In order to do so, you will need to request that we no longer send marketing materials to you or disclose your information to other organisations for marketing purposes. You can make this request by using the contact details provided above, or by "unsubscribe" from email or other marketing messages.