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ADDRESS: 351 Moorabool Street Geelong, Victoria, Australia 3220  
TEL: (03) 5221 8911 FAX: (03) 5229 1369

## PRIVACY AND CREDIT REPORTING POLICY

### 1. DEFINITIONS

**'Personal Information'** is defined in the Privacy Act 1988 (Cth) to mean information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a) whether the information or opinion is true or not; and
- b) whether the information or opinion is recorded in a material form or not.

**'Sensitive Information'** is defined in the Privacy Act to include things such as race, sexual orientation, political opinions, members of a trade association or trade union, criminal record or health information.

**'Credit Reporting Information'** is used in this Policy to describe Credit Information, as defined in the Privacy Act, including, where the context requires, information obtained from Credit Reporting Bodies.

### 2. OVERVIEW OF THIS POLICY

This Privacy & Credit Reporting Policy details how we comply with the Privacy Act, including:

- a) the Australian Privacy Principals; and
- b) the Credit Reporting Code,

which have been introduced under that Act

This Policy does not apply to the collection or use of information about corporations.

We may from time to time review and update this Policy to take into account new laws and technology, our operations and practices. We encourage you to check our website from time to time to ensure that you are aware of our current Policy.

### 3. THE TYPE INFORMATION WE COLLECT

#### 3.1. Personal Information

The type of Personal Information we collect and hold includes:

- a) identification information, such as your name, date of birth and address;
- b) telephone numbers and e-mail address including that of next of kin in case of emergency;
- c) licence, passport, Government issued Visa details;
- d) credit information, such as details relating to credit history, credit capacity, and eligibility for credit;
- e) Government identifiers (such as your tax file number);
- f) Centrelink, Medicare Card or Health Care/Concession Card information;

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- g) Company or banking details including credit or debit card information;

### 3.2. Sensitive Information

We may at times, subject to this Policy, collect and hold Sensitive Information.

### 3.3. Credit Reporting Information

The type of Credit Reporting Information we collect includes:

- a) identification information, such as age, date of birth, tax file number;
- b) credit-related information, such as:
- the type of credit you have obtained and the terms upon which it was obtained
  - the day on which the credit is entered into and the day on which it is terminated or otherwise ceases to be in force
  - repayment history information and default information
  - scores, ratings, summaries, evaluations and other information relating to your credit worthiness
- c) certain administrative information relating to credit;
- d) personal information which has bearing on your creditworthiness which is relevant to evaluating your eligibility for credit, such as:
- insolvency information
  - credit infringement information
  - court judgments made in relation to your past or present credit arrangements.

## 4. COLLECTION

We collect Personal, Sensitive and Credit Reporting Information only by fair and lawful means where it is reasonable and practicable to do so.

We generally will only collect such information about you if you voluntarily submit it to us by:

- a) providing your information in a meeting, or during a telephone call with our staff;
- b) sending us an email or facsimile;
- c) completing forms;
- d) sending us information via the 'Contact Us' page on our website; and/or
- e) sending us information when using any part of our website.

We will not collect Personal Information about you from third parties unless:

- a) you consent to the collection of the information from someone else; or
- b) it is unreasonable or impracticable to collect the information from you.

We may also collect Credit Reporting Information from Credit Reporting Bodies as well as from publicly available information.

If we collect Personal Information from a third party, we will inform you that Personal Information has been collected and the circumstances of such collection.

If we are required to collect Personal Information, Sensitive Information and Credit Reporting Information about you under an Australian law, we will inform you of this, including details of the law requiring the collection.

Where we receive unsolicited Personal or Sensitive Information about you, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this

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information in the same way we do other information we seek from you. If not, we will destroy or de-identify it.

## 5. REASON FOR COLLECTION, DISCLOSURE & USE

### 5.1. Personal Information

We will not collect Personal Information unless the information is reasonably necessary to:

- a) provide goods and services to you;
- b) establish an account for you;
- c) contact you about your orders;
- d) give you access to specific sections of our website and improve your online experience with us;
- e) as required by Federal or State laws; or
- f) as required by Federal or State government funding agreements.

We may disclose Personal Information to certain overseas recipients given that our business does operate overseas as well as in Australia. Before disclosing Personal Information to an overseas recipient, we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles with respect to the Personal Information.

Those countries where it is likely that we will disclose Personal Information are Australia and its Territories only.

### 5.2. Sensitive Information

We will not collect Sensitive Information about you unless:

- a) we obtain your explicit consent to collect and use such information, or:
- b) the information is reasonably necessary for one or more of our functions or activities;  
or
- c) the collection of the information is required or authorised by or under Australian law or a court/tribunal order; or
- d) a permitted general situation exists in relation to the collection of the information by us;  
or
- e) a permitted health situation exists in relation to the collection of the information by us.

### 5.3. Credit Reporting Information

We collect, use and hold your Credit Reporting Information:

- a) to determine payment terms for the goods and/or services we provide;
- b) for day to day administration purposes; and
- c) to satisfy our legal obligations.

In addition, we use Credit Reporting Information that we obtain from Credit Reporting Bodies to derive information in relation to your creditworthiness and eligibility for credit. This is known as "Credit Eligibility Information".

We may disclose Credit Reporting Information about you to Credit Reporting Bodies and debt collection companies where you are in payment default. We will only make a disclosure in these circumstances if we have given you written notice of our intention to disclose and at least 14 days has passed since giving you such notice.

The types of Credit Reporting Information that we may disclose includes:

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- a) identification information; and
- b) information that you have defaulted on a payment due to us and the amount of the default.

Subject to the above, we will not disclose Credit Reporting Information, including Credit Eligibility Information, about you unless you have authorised the disclosure or it is otherwise in accordance with the law.

## 6. **MARKETING**

We may use and/or disclose your Personal Information in order to:

- a) provide you with news and information about our goods and services;
- b) provide you with marketing and promotional material that we believe you may be interested in; or
- c) seek your feedback on our services.

Only with your express consent will we use or disclose Personal Information (including Sensitive Information) about you for the purposes of direct marketing. You can ask us not to do this at any time by writing to: The Chief Operations Officer, PO Box 1986, Geelong VIC 3220

We will not sell your Personal Information, Sensitive Information or Credit Reporting Information.

## 7. **SECURITY**

We take reasonable steps to protect your Personal Information, Sensitive Information and Credit-Reporting Information against misuse, interference, loss, unauthorised access, modification and disclosure. The protective steps we take include:

- a) confidentiality requirements of our employees;
- b) document storage security policies; and
- c) security measures for access to our systems.

## 8. **CORRECTION**

We aim to ensure that the Personal Information, Sensitive Information and Credit Reporting Information we hold is accurate, up-to-date and complete. Please ensure any information you provide is accurate, up-to-date and complete, and notify us if you believe we hold information that is outdated, inaccurate, misleading, irrelevant or incomplete so that it can be corrected.

We will not charge you for a correction.

If a correction is made to any information that was previously disclosed to a third party, as long as it is reasonable to do so, we will give each such recipient written notice of the correction within a reasonable period. We will also notify you that the correction has been made.

## 9. **ACCESS**

You are entitled to access your Personal Information, Sensitive Information and Credit Reporting Information held by us.

If you wish to access this information, you must lodge a request for access by contacting The Chief Operations Officer by email on [enquiries@wccgroup.com.au](mailto:enquiries@wccgroup.com.au), or by post to PO Box 1986 Geelong VIC 3220

We may charge a fee to cover our reasonable costs in meeting an access request. You will be provided with access to the information within 30 days of the request (unless unusual circumstances apply).

We are not required to give you access to this information if:

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- a) it would be unlawful to do so; or
- b) denying access is required or authorised by Australian law or a court/tribunal order; or
- c) to do so would likely prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

If we do not give you access to the information requested you will receive written notice that explains the reason for the refusal.

## 10. COMPLAINTS

Complaints about alleged breaches by us of the Privacy Act, the Australian Privacy Principles, the Credit Reporting Code or this Policy can be made by The Chief Operations Officer by email on [enquiries@wcgroup.com.au](mailto:enquiries@wcgroup.com.au), or by post to PO Box 1986 Geelong VIC 3220. If you do not consider that your complaint has been adequately dealt with by us, you may make a further complaint to the Office of the Australian Information Commissioner, which has complaint handling responsibilities under the Privacy Act.

## 11. FURTHER INFORMATION

For further information about privacy, the protection of privacy and credit reporting, visit the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au)

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