

## Privacy Policy

This Policy was last updated on 09/12/2019.

### Introduction

Sentek Pty Ltd ACN 007 916 672 (“**Sentek**”, “**we**”, “**our**” or “**us**”) has a commitment to privacy in accordance with the *Privacy Act 1998* (Cth) (“**Privacy Act**”). We are bound by the Privacy Act and the Australian Privacy Principles contained within the Privacy Act. This Privacy Policy is provided to make you aware of how we collect, use and manage personal information. Personal information means information or an opinion recorded about an individual that makes the individual's identity reasonably apparent or ascertainable. We view the privacy of personal information as an important issue.

If you are located in the European Union (EU) (including the European Economic Area (EEA)), our European Union General Data Protection Regulation Addendum below provides further information about our processing of your personal data and your additional data subject rights in relation to the processing of your personal data under the EU General Data Protection Regulation (2016/679) (GDPR).

By voluntarily supplying us with your personal or credit information, you are agreeing to be bound by this Policy.

### Collection of personal information

The type of personal information we may collect and hold about you includes, but is not limited to:

- information you provide to us at our request including your name and address and, when you use our web site, your domain name and e-mail address;
- financial information, including bank and cheque account details and credit card details, and information about your credit history;
- details about your purchases and orders from us and your product and services preferences;
- employer details;
- business details (including Australian Business Number (“**ABN**”));
- information you provide as part of using the software that we distribute; and
- if you apply for employment with us, details regarding your employment history, educational qualifications and similar information.

In addition, we may collect and hold the following credit information:

- identification information - name, date of birth, current or previous address, driver's licence number;
- type and amount of credit sought;
- trade references – name of entity, ABN, contact name, telephone number, fax number, email, years trading with you; and
- publicly available information about an individual's creditworthiness.

We collect, hold and disclose your personal and credit information for the following purposes:

- as a necessary part of providing our goods and services, including distributing software, to you;
- to promote and market our products and services to you or provide you with information that we believe may be of interest to you (unless as directed otherwise);
- to personalise and customise your experiences with our website;
- to help us research the needs of our customers and to market our goods and services with a better understanding of your needs and the needs of customers generally;

- inviting you to seminars and functions which we think may interest you;
- any other purpose to which you have consented; and
- other purposes related to any of the above.

We will only use your information for the purposes for which it was collected (“**primary purposes**”) or a purpose related to the primary purpose, if this use would be reasonably expected by you, or otherwise, with your consent.

If you do not wish us to use your information in any of the above ways, please contact us (see addresses under paragraph entitled "Contact us").

### **Means of collection of personal and credit information**

Your personal and credit information may be collected in a number of ways, including:

- directly by our staff when you seek, or enquire about, our services;
- when you use our website or complete a form on our website; or
- when you register and use our Sentek software products.

In some circumstances, where it is unreasonable or impracticable to collect information from you, we may collect information about you from a third party source. For example, we may collect information from a publicly maintained record.

In addition to the methods above, we may collect credit information from other credit providers, subject to any restrictions at law.

You need not provide all the information requested by us, but this may prevent us from providing some or all of our goods or services to you.

### **Accuracy and completeness of personal information**

While we will endeavour to ensure that the personal information collected from you is up to date and complete, we will assume that any personal information provided by you is free from errors and omissions, is not misleading or deceptive and complies with relevant laws.

We rely on the personal information provided by you. We will not check or verify the accuracy of any personal information we obtain from you or other persons.

You should provide us with details of any changes to your personal information as soon as reasonably practicable following such change.

### **Distribution of your personal information**

We do not permit the information we hold to be distributed to third parties unless:

- we consider it necessary to provide it to a third party who assists us to provide, manage and administer our goods and services;
- you have consented or requested your personal information to be provided to a third party; or
- we are required or permitted by law to provide information to a third party.

People we may disclose your information to include:

- third parties that provide goods and services to us or through us;

- third parties, such as marketing and digital agencies, who may send to you our e-newsletters on our behalf;
- our website host or software application providers; and
- other organisations listed as trade references in a credit application.

Information provided to third parties will be dealt with in accordance with that entity's privacy policy

We may disclose your personal information to overseas third parties located in Africa, Asia, Europe, North America, South America and Oceania, most notably the United States, Italy and Israel, for the purposes of supplying our goods and services.

### **Quality, access to & correction of information**

You are entitled to have access to and seek correction of any personal information that we may hold about you. We require that requests for access to or to update or correct your personal information to be in writing outlining the details of your request. Such requests should be addressed to the Privacy Officer via the details provided in this Privacy Policy.

We will take appropriate steps to verify your identity (or verify that you act as an authorised agent of the individual concerned) before granting a request to access your personal information.

We will respond to your request for access to your personal information within a reasonable time after you make the request and if access is granted, access will be provided within 30 days from your request. We will, on request, provide you with access to your personal information or update or correct your personal information, unless we are lawfully excluded from granting your request, including if:

- giving access would be unlawful;
- we are required or authorised by law or a court/tribunal order to deny access; or
- giving access is likely to prejudice one or more enforcement related activities conducted by an enforcement body.

Where your request for access is accepted, we will provide you with access to your personal information in a manner, as requested by you, providing it is reasonable to do so.

Your request for correction will be dealt with within 30 days, or such longer period as agreed by you. If we deny your request, we will provide you with a written notice detailing reasons for the refusal and the process for making a complaint about the refusal to grant your request.

We will accept your request for correction of your credit information where we are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading.

Upon accepting a request for correction of your personal information, we will take all steps that are reasonable in the circumstances, having regard to the purpose for which your information is held, to correct your personal information.

If your request for correction of credit information is accepted we will provide written notice of this correction to any entity to which we have disclosed this information previously, to the extent that this is practicable.

### **Storage and security**

Your personal and credit information will be stored as physical files in a secured area, on our electronic data base system and on computers with appropriate back up and security systems. Your personal and

credit information may also be stored on a number of third-party cloud hosted websites including but not limited to Nutshell CRM, Mailchimp and Gmail. Any personal or credit information which is collected via our website, or which is held on our computer systems, is protected by safeguards including physical, technical (including firewalls and SSL encryption) and procedural methods.

We take reasonable steps to hold information securely in electronic or physical form. We are committed to keeping secure the data you provide to us and we will take all reasonable precautions to protect your personally identifiable information from loss, misuse, interference, unauthorised access or alteration.

We aim to achieve this through:

- imposing confidentiality requirements on our employees;
- implementing policies in relation to document storage security;
- implementing security measures to govern access to our systems;
- only providing access to personal information once proper identification has been given; and
- controlling access to our premises.

When your personal and credit information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify it. However, most of the personal and credit information is or will be stored in client files which will be kept by us for a minimum of 7 years, unless as otherwise required by law.

## **Cookies**

A cookie is a data file that a website transfers to your hard drive. This enables the website to track the pages you have visited. A cookie only contains information you supply. It cannot read data on your hard drive. Our website uses cookies and collects the following information from users:

- your server address;
- your top level domain name (for example, .com, .gov, .au etc);
- the date and time of your visit to the site;
- the pages you accessed;
- the previous site you have visited; and
- the type of browser you are using.

You can set your browser to refuse cookies, however, this may mean you are unable to take full advantage of our website.

## **Opting out**

Every directly addressed marketing contact sent or made by Sentek includes a means by which you may unsubscribe (opt out) of receiving further marketing information. Additionally, you may instruct us at any time to remove any previous consent you provided to receive marketing communications from us. You may also change your marketing preferences regarding the type of material you will receive. Requests should be directed to Sentek Marketing Manager, email [marketing@sentek.com.au](mailto:marketing@sentek.com.au) or you can also call Sentek general enquires line on (08) 8366 1900.

## **External links**

Our websites often contain links to other websites. Please be aware that we have no control over other websites and if a user clicks on a link to another site, they leave our site and are no longer protected by

this Privacy Policy. For this reason we encourage you to read the privacy policy of each website that you visit.

### **Dealing with us anonymously**

Where lawful and practicable to do so, you can deal with us anonymously or using a pseudonym. You can deal with us anonymously or using a pseudonym when making a general enquiry about the goods and services that we can offer to you including via telephone or our website.

At the time you seek a quote, or purchase our goods or engage our services, it is no longer practicable for you to deal with us anonymously or using a pseudonym.

### **Credit information notifiable matters**

In accordance with our obligations under the Privacy Act, we set out the following notifiable matters in relation to any of your personal or credit information disclosed by us to a credit reporting body for the purposes of undertaking a credit check.

- In connection with the provision of credit, we may disclose your personal and credit information to the following credit reporting bodies (“**CRB**”) for the purposes of undertaking a credit check in relation to an application made by you.

#### National Credit Insurance

You may contact National Credit Insurance using the details set out below:

- o via National Credit Insurance’s website at <https://nci.com.au/>; or
- o phone: (08) 8228 4800.
- A CRB may include any of your personal or credit information, disclosed to it by us, in reports provided to other credit providers to assist other credit providers to assess your credit worthiness.
- Our policy about the management of personal and credit information is set out in this Privacy Policy.  
You may access a copy of a CRB’s policy about its management of credit information on its website as set out above.
- You have the right to make a request to a CRB not to use or disclose your credit reporting information:
  - o for the purposes of pre-screening of direct marketing by a credit provider; or
  - o if you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud.
- If you fail to meet any of your payment obligations under the terms of the credit that we provide to you, or if you commit a serious credit infringement, we may be entitled to disclose this to a CRB.

### **Complaints**

If you believe that we have breached a term of this Privacy Policy or the Privacy Act you may submit a written complaint. The written complaint can be emailed or posted to us using the contact details set out below. You must include contact details for us to contact you regarding your complaint.

Our Privacy Officer will consider your complaint and respond as soon as reasonably possible, but not more than 30 days from receiving the complaint.

If you are unsatisfied with the outcome of your complaint you may refer your complaint to the Office of the Australian Information Commissioner to be resolved.

### **Contact us**

If you wish to:

- gain access to your personal information;
- make a complaint about a breach of your privacy;
- contact us with a query about how your information is collected or used;
- contact us regarding any other matter concerning this Policy,

you can speak directly with our staff who will do their best to try to resolve your issue as simply as possible. Alternatively, you can write to us or send us an email so that our Privacy Officer can consider the matter. We will respond to you as soon as reasonably possible.

Our Privacy Officer can be contacted as follows:

Privacy Officer  
Sentek Pty Ltd  
77 Magill Road  
Stepney, SA 5069

Telephone: (08) 8366 1900  
Facsimile: (08) 8362 8400  
E-mail address: [sentek@sentek.com.au](mailto:sentek@sentek.com.au)

### **Variation of Privacy Policy**

We may vary the terms of this Privacy Policy from time to time. Any amendments will be notified to you by posting an updated version on our website.