

Privacy Policy

Interpretation

"**APP**" means the *Australian Privacy Principles* as set out in Schedule 1 of the Privacy Act, as amended.

"**SMR**" means Straightline Metal Roofing Pty Ltd (ACN 126 030 993).

"**Law**" includes legislation (whether federal or state), regulations, by laws, public health orders, codes of practice or any other requirement of any government or regulatory authority which is enforceable by law.

"**Personal Information**" means which is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

"**Policy**" means this privacy policy.

"**Privacy Act**" means the *Privacy Act 1988* (Cth) as amended.

"**Sensitive Information**" is a subset of Personal Information, and includes information or an opinion about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, or health, genetic or biometric information.

1. Introduction

- a) SMR manages your personal information in accordance with the Privacy Act and the APP.
- b) This Privacy Policy relates to any personal information that SMR collects, holds, discloses and/or uses via <https://straightlinemetalroofing.com.au/> and any related SMR terms of trade, website, social media page, internal website or intranet ("**Websites**") or applications ("**Applications**") or any other manner.
- c) This Policy is effective from May 2022.

1.2 Changes to this Privacy Policy

SMR reserves the right to update or change this Policy at any time and you should check this Policy periodically. Your continued use of the service after we post any modifications to this Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

2. What kinds of information is collected and held?

SMR collect and holds information about SMR's employees, contractors who provide us with a service, customers, website users, suppliers, job applicants and other people who may come into contact with us or one of our businesses from time to time.

2.1 Personal Information

- a) Examples of Personal Information that may be collected and held by SMR includes but is not limited to your:
 - i) first and last name;
 - ii) date of birth;
 - iii) gender;
 - iv) company name and details;
 - v) delivery address;
 - vi) contact phone number;
 - vii) mobile phone number;
 - viii) email address;
 - ix) employment information;
 - x) individual preferences;
 - xi) marketing information;
 - xii) trade references;
 - xiii) credit card details;
 - xiv) bank account details;
 - xv) signature;
 - xvi) IP address; and/or
 - xvii) ABN and/or ACN.

- b) Financial information including credit card and payment details SMR may also combine your personal information with other information to provide and improve our products, services, content, and advertising.
- c) You are not required to provide the personal information that we have requested, and you may choose to interact or transact with SMR anonymously or by way of pseudonym, but in many cases we will not be able to provide you with our products or services or respond to any queries you may have including where it is impracticable to deal with you unidentified or if required by Law to identify you.
- d) SMR collects only personal information that is reasonably necessary for, or directly related to, its functions or activities. The nature and extent of personal information SMR collects and holds will vary depending on a person's particular relationship and interaction with SMR.

2.2 Sensitive Information

- a) SMR will not collect Sensitive Information unless the person to whom it relates consents to the collection of that information, and the information is reasonably necessary for one or more of SMR's functions or activities, except where the collection is required or authorised by Law, is necessary to prevent or lessen a serious and imminent threat to the person's (or another person's) life or health, or is necessary in relation to legal proceedings (current, anticipated or potential), or another permitted exception in the Privacy Act applies.

2.3 Sensitive information - vaccination information

- a) Your vaccination information is Sensitive Information that may be collected by SMR including any requisite vaccination evidence as required by Law, including any:
 - i) vaccination digital certificate (whether domestic or international);
 - ii) immunisation history statement;
 - iii) documentation evidencing a valid exemption from vaccination or otherwise; or
 - iv) any other information which we might be required by law to hold from time to time.

3. How do we collect and hold personal information?

3.1 Directly

- a) Directly from customers when you provide Personal Information. For example, when engaging SMR to perform certain services and signing terms and conditions.
- b) In your communications with us such as when you call or write to us or when we interact with you in person in the provision of our services.
- c) When you interact and/or browse the Website or any Application associated with it generally or for a specific purpose.
- d) When representatives of SMR such as employees undertake certain business functions for SMR for example to attend upon customers in the provision of SMR's services.

3.2 Indirectly

- a) Third party providers
 - i) Data is collected, processed and stored using third party analytics software that is to the best of our knowledge secure and confidential. Analytical data is used to gain an understanding of user behaviour, perform system critical operations, and in extraordinary circumstances, for legal reasons. Anonymous user data is shared between third party services in order to gain insight as to aggregate user behaviour.
 - ii) Analytic data insights are also used to target users through remarketing, demographics, interests and website behaviour.

Third party vendors, including but not limited to Google and Facebook may show our ads on sites across the internet. We and third party vendors, including but not limited to Google, make use of third party cookies together in order to inform, optimise and serve ads based on past visits to a website. We make use of demographic data (such as age, gender and interests) obtained through third party tools in order to, but not limited to: influence marketing spend and communicate internally and externally the aggregate behaviour.

3.3 Public sources

When you use some of SMR services, or applications or post on a social networking service such as Instagram or Facebook, the personal information and content you share is visible to other users and can be read, collected, or used by them and SMR. For example, if your name or email address is contained in a public post, that information is then public and can be collected by SMR.

3.4 Combining/linking Personal Information

Other than as referred to elsewhere in this policy, we will not facilitate the merging of personally identifiable information with non-personally identifiable information without prior user consent to that merger to optimise our Website and Website marketing. For example, we may collate Personal Information data and aggregate data for the purpose of comparing marketing costs with revenue on a transactional basis.

3.5 Passive collection of information – Direct Marketing and Behavioural Advertising

- a) As you navigate through our Websites and access our Applications, certain information can be passively collected (that is, gathered without your actively providing the information) using various technologies, such as cookies, Internet tags or web beacons, and navigational data collection (log files, server logs, and clickstream data).
- b) For example, we may collect information about matters including but not limited to the date, time and duration of visits and which pages of a Website or Application are most commonly accessed. This information is generally not linked to the identity of visitors, except where a Website or Application is accessed via links in an email or another electronic message we have sent or where we are able to uniquely identify the device or user accessing a Website or Application, such as when you are logged into an account.
- c) We may share hashed portions of your information with certain strategic partners to make our business more responsive to your interests and/or those of like-minded consumers. For example, we may aggregate your email address together with the email addresses of others who place Enquiries on our Site, locally hash such data, and transmit the resulting hashed data to third parties including but not limited to Facebook/LinkedIn/Google for the purpose of creating “Custom Audiences” (where targeted ads are sent to people on Facebook who have already been on our Site), and “Lookalike Audiences” (where targeted ads are sent to people on Facebook/LinkedIn/Google who have similar characteristics to people on our Custom Audience list).
- d) Where we use Personal Information for promotional or direct marketing purposes, a person may at any time request SMR to not use their Personal Information for sending direct marketing material to that person including if you wish to opt-out of the use of certain hashed portions of your Personal Information. Such a request can be made by contacting SMR either in writing, by email or by telephone at the contact details below. There is no fee for making such a request.
- e) Direct marketing can include for example: Displaying an advertisement on a social media site that an individual is logged into, using Personal Information, including data collected by cookies relating to websites the individual has viewed.

3.6 Cookies & Web Beacons

- a) We use cookies on our Websites. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information. However, once you choose to furnish the Websites with personally identifiable information, this information may be linked to the data stored in the cookie.

- b) We may use web beacons on the Websites from time to time. Web beacons or clear .gifs are small pieces of code placed on a web page to monitor the behaviour and collect data about the visitors viewing a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

4. How SMR hold information and security

4.1 How SMR hold information

- a) Data is collected, processed and stored using third party customer relationship management software together with financial software that is to the best of our knowledge secure and confidential. We hold Personal Information electronically and in hard copy form, both at our own premises and with the assistance of these service providers.
- b) SMR where necessary retains the information you provide to us including your contact and certain credit card details to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes. This information is held on secure servers in controlled facilities.

4.2 Security

- a) We have systems in place to ensure that information is accessible by our staff on a need-to-know basis.
- b) We act to safeguard the security and privacy of your information, whether you interact with us personally, by telephone, mail, over the internet or other electronic medium. We strive to take reasonable steps to protect the information we hold from misuse, interference, loss and unauthorised access modification or disclosure, however we cannot guarantee its absolute security.
- c) In certain circumstances we use third party storage providers such as cloud storage and back-ups to hold information that is stored in soft copy electronic form.
- d) When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information. However most personal information is stored in client files which will be kept for a minimum of seven years.

5. The purposes for which we collect, hold, use and disclose personal information

SMR collects this Personal Information in various ways in the course of conducting its business, to provide and improve our products, services, content, and advertising including for the purposes of:

- a) contacting customers;
- b) providing goods and services to customers;
- c) processing payments from our customers;
- d) tracking customer goods and managing inventory;
- e) providing newsletters and discounts to customers via e-mail;
- f) responding to customer queries in relation to our products and services;
- g) interaction with customers who utilise our Website;
- h) to better understand your needs, enabling us to improve our products and services;
- i) to make improvements to the Websites to enhance the user experience;
- j) promotional and marketing activities;
- k) monitor the effectiveness of our advertising;
- l) to customise our Websites according to your interests; and/or
- m) direct marketing and behavioural advertising.

5.2 Sensitive Information – vaccination information

- a) With regard to Sensitive Information, where it is necessary to collect, hold use and/or disclose this information this is done so as to:
 - i) comply with any Laws or third-party requirements; and

- ii) prevent and manage the risk of transmission of certain viruses or otherwise, for example COVID-19.
- b) With regard to disclosure, your vaccination information may be disclosed to comply with any Laws in the provision of SMR's services, for example to any government health department or otherwise to the extent necessary.

6. How can you control your personal information?

6.1 Accessibility

- a) A person may request to access Personal Information about them held by SMR. Such a request must be made in writing via our contact details below.
- b) SMR will take reasonable steps to ensure the accuracy and completeness of the Personal Information we hold. However, if a person believes that any Personal Information that we hold about them is inaccurate or out of date, then they should contact SMR in writing via our contact details below.
- c) SMR will grant a person access to their Personal Information as soon as possible, subject to the circumstances of the request.
- d) Verification of identity is required with a request to access (or update) Personal Information so that we can ensure your Personal Information is disclosed only to you.

6.2 Complaints

- a) An individual can contact SMR in relation to lodging a complaint about a breach of the APP or a binding registered APP code, via our contact details below at clause 8 of this Policy.
- b) SMR will make an assessment of the complaint and will respond to you within a reasonable timeframe. Any further action following this initial response will vary depending on the nature of the complaint. If necessary, the complaint may be taken to the Office of the Australian Information Commissioner or to another review body if an external review is required.

6.3 Opt outs

- a) The opportunity to opt out of behavioural based digital advertising is available by visiting the Office of the Australian Information Commissioner website. Or you may wish to install an advertisement blocking program.
- b) You may also opt out of our direct marketing emails by clicking on the link contained in any such emails or by writing to SMR at the email address at clause 8 below.

6.4 Freedom of Information Act 1982 (Cth)

- a) You may also have the right under the *Freedom of Information Act 1982* (Cth) to request access to documents that we hold and ask for

information that we hold about that person to be changed or annotated if it is incomplete, incorrect, out-of-date or misleading.

7. Disclosure of Personal Information

- a) Where we receive your personal information and we did not solicit the information we will do our best to notify you of our receipt of your personal information within a reasonable time. If we determine that we could not have received the information under the APP we will use our best endeavours to destroy the information. We may use or disclose the information to make such a determination.
- b) We may disclose your personal information to our related companies, service providers and specialist advisers who have been contracted with administrative or other services, insurers, credit providers, a person authorised by you to access the information. We may also disclose personal information to others if required to do so by law. We do not guarantee website links or policy of authorised third parties.
- c) SMR or third parties may disclose your personal information to overseas recipients, which may occur for example where personal information is disclosed to an entity which is an overseas recipient by virtue of the personal information being stored on a third party's software or cloud based service or where any personal information is published by SMR on the internet, whether intentionally or not, and it is accessible to an overseas recipient. Disclosure to overseas recipients may also occur where for example SMR emailed or sent a document to an overseas client that contained an individual's personal information.
- d) We do not sell, publish or give away your information to any other party where the information could be linked to you.
- e) SMR does not disclose personal health information to any other person, including next of kin, unless the individual about whom the information relates has given express consent, or the disclosure is required or authorised by or under Australian law, or would otherwise be consistent with the APPs.

8. SMR contact details

Privacy officer	Matthew Long
Email:	matt@smroofing.com.au
Postal address:	Unit 23/8 Lewalan Street, Grovedale VICTORIA 3216 AUSTRALIA
Phone:	0417 054 844