

Sydney Hills Business Chamber Inc

PRIVACY POLICY and STATEMENT

Background

We appreciate the importance of protecting your personal information and recognise the trust placed in us when you supply your personal information to us.

We aspire to comply with the Privacy Act 1988 (Cth) and the thirteen (13) Australian Privacy Principles (**APP's**) contained within that Act, as amended from time to time, in the way we collect, use, disclose and manage your personal information. This policy explains how we handle personal information relating to individuals, whether or not they are members. Nothing in this policy limits any of our other obligations at law.

In this Policy, any reference to "we", "us" or "our" means Sydney Hills Business Chamber Inc (**'SHBC'**) and any related or affiliated entity.

We may from time-to-time review and update this Privacy Policy so please check our website periodically to stay informed of any updates. All personal information collected and held by us will be governed by the most recently updated Privacy Policy.

General

1. The *Privacy Act 1988* (Cth) regulates the collection, use, disclosure, quality, and security of personal information. The object of the privacy principles is to allow for the open and transparent management of personal information.
2. The Act gives individuals the right to access and correct personal information and to make a complaint in the event that they think their personal information has been mishandled.
3. The thirteen (13) APP's in the *Privacy Act 1988* protect personal information and give individuals rights in the way that APP entities collect and manage the use of personal information.
4. We, as an APP entity, aspire to comply with the thirteen (13) APPs, summarised below under 'General Principles'. We recognise that personal information is confidential and that unauthorised use or disclosure, or the failure to take reasonable steps to prevent and protect from misuse, interference or loss from unauthorised access, modification, or disclosure, may be a breach of contract and a breach of the *Privacy Act 1988*.

General Principles

1. We will only manage personal information in an open and transparent way. We have taken steps to implement practices, procedures and systems relating to our functions and activities that ensure compliance with the *Privacy Act 1988* and enables us to deal with complaints and inquiries from individuals about our compliance with the Privacy Act 1988. (**APP 1**);

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2. We will ensure individuals are afforded the opportunity of not disclosing their identity and/or the ability to use a pseudonym unless dictated otherwise by Australian law or if we deem it impracticable to deal with individuals who will not reveal their identity or who choose to use a pseudonym **(APP 2)**;
3. Personal information (other than sensitive information) will only be collected because the information is reasonably necessary for one or more of our functions or activities. We will only collect personal information by lawful and fair means and will only collect the information from an individual unless it is unreasonable or impracticable to do so **(APP 3)**;
4. Unsolicited personal information received by us will be evaluated as to whether or not we could have collected the information under APP 3 if we had actually solicited the information. Where we determine that the information could not have been collected under APP 3, the information will be destroyed or ensure it is de-identified as soon as practicable **(APP 4)**;
5. We will take reasonable steps to notify the individual, at or before the time personal information is collected the following details:
 - a) our identity and contact details;
 - b) the purposes of collecting personal information;
 - c) the consequences for the individual if all or some of the personal information is not collected by us;
 - d) whether the personal information will be disclosed to another APP entity;
 - e) that our privacy policy contains information about how the individual may access their own personal information and how to seek the correction of information;
 - f) how the individual may make a complaint about an alleged breach of APP's, whether personal information will be disclosed to overseas recipients and list the countries in which those overseas recipients will be located **(APP 5)**;
6. Personal information will only be used and disclosed for the primary purpose for which it was collected. We will only use personal information for another purpose (secondary purpose) in circumstances where it is within the individual's reasonable expectation that the information will be used or disclosed, and the individual has consented to the use or disclosure of the information. We will make a written note of the use or disclose of personal information on the individual's file in these circumstances **(APP 6)**;
7. Personal information will generally not be used for the purpose of direct marketing. However, we may use or disclose personal information about an individual for the purpose of direct marketing if the information was collected by the individual, the individual would reasonably expect the use or disclosure of information for that purpose, there is means by which the individual may request not to receive direct marketing and the individual has not made such a request **(APP 7)**.
8. Prior to us disclosing personal information to another overseas person or entity, we will take reasonable steps to ensure that the overseas recipient does not breach any or all APP's **(APP8)**;
9. We will not adopt, use or disclose a government related identifier, such as a tax file number, of an individual as an identifier of the individual unless legislation or a Court of competent jurisdiction dictates otherwise, unless the use or disclosure is reasonably necessary to verify the identity of the individual for the purposes of our activities or functions, and is necessary to fulfil obligations to an agency or a State or Territory authority or to an enforcement body to conduct related activities **(APP9)**;

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10. We will take reasonable steps to ensure that the information which we collect, use or disclose is accurate, complete, up-to-date and relevant **(APP 10)**;
11. We will take reasonable steps to maintain the integrity of personal information by protecting personal information from misuse, interference and loss and from unauthorised access, modification or disclosure. Where personal information is held about an individual and that information is no longer needed by us, we will take reasonable steps to destroy the information or ensure the information is de-identified as soon as practicable **(APP10)**;
12. We will give an individual access to their own personal information when requested except where exceptions apply in legislation. We will respond to a request for access to information within a reasonable period of the request being made. In the event that a request to grant access to personal information is refused, we will provide written notice setting out:
 - a) the reasons for the refusal;
 - b) the mechanisms available to complain about the refusal; and
 - c) any other matter prescribed by the regulations **(APP 12)**;
13. We will take reasonable steps to correct personal information in circumstances where it has become inaccurate, out of date, incomplete, irrelevant, or misleading or the individual requests to have the information corrected. If an individual requests that personal information needs to be corrected by a third party APP entity which has previously had personal information disclosed to it, we will provide notification to the APP entity. In the event that a request to grant access to personal information is refused, we will provide written notice setting out:
 - a) the reasons for the refusal;
 - b) the mechanisms available to complain about the refusal; and
 - c) any other matter prescribed by the regulations **(APP 13)**;

Scope

We are committed to protecting the privacy and security of personal information obtained from individuals. This deals with the collection, use and disclosure of personal information as well as access to, and destruction of, personal information and security issues.

Definitions

The expression 'personal information' is used in this policy to refer to information about an individual whose identity is apparent, or can reasonably be ascertained, from the information.

Collection and Storage of Personal Information

The type of personal information that we collect about you depends on the transactions you undertake with us. For example, we will collect personal information from you if you:

- Purchase products and/or services from us;
- Apply to us for the provision of credit;

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- Visit our website <http://www.sydneyhillsbusiness.com.au> and any associated content and/or hyperlinks or otherwise contact us online;
- Join as a member;
- Come to an event as a guest;
- Enter any competition that we may run from time to time;
- Became a reseller of our goods and services.

Generally speaking, the purpose of collection and the minimum information you need to provide will be conveyed to you at the time of collection.

If you choose not to provide the personal information requested, we may not be able to provide you with the products/services you require.

Purpose, Use and Disclosure of Personal Information

Your personal information may be used for the primary purposes of:

- Our general business operations;
- Communicating with you;
- Responding to your inquiries or complaints;
- Meeting our legal and regulatory obligations;
- Direct marketing (such as providing you with information about our products and promotional notices and offers);
- where applicable, assessing and processing an application for commercial credit, and for administrative purposes in relation to the ongoing management of your commercial credit arrangement;
- Provide the products and services you have requested;
- Administer and manage service offerings including charging, billing and collecting debts;
- Research and develop our product and service offerings;
- Gain an understanding of your information and communication needs to enable us to provide you with a better product or service; and
- Provide you with access to and information about a range of current and future product or service offerings.

Your personal information is only collected by lawful and fair means and where practicable, only from you or from a person acting or authorised to act on your behalf. Where you have applied for commercial credit account with us, we may also make enquiries in respect of commercial credit with third parties with your consent. This could include persons nominated by you as trade references, credit reporting bodies ("CRBs") and your bankers.

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We will take reasonable steps to ensure that you are aware of:

- the likely use of the information;
- the right of access to the information;
- the identity and contact details of our employee/representative collecting your personal information;
- any law requiring collection of the information; and
- the main consequences of failure to provide your personal information.

When We Disclose Your Personal Information

For the purposes set out above, we may disclose your personal information to third parties. The organisations to which we disclose information may include:

- our related companies, suppliers, consultants, contractors or agents for the primary purpose for which it was collected or for other purposes directly related to the purpose for which the personal information is collected;
- External credit reporting agencies;
- External service providers to whom we have contracted out functions, such as printers, mailing houses, but only for the purpose of providing the service we have contracted out;
- for direct marketing by us, but giving you the opportunity to opt out of such direct marketing; We will include our contact details in any direct marketing.
- Members of the general public looking for a service provider, **but we will only disclose your personal information if you have provided us with your written consent;**
- Online and social media advertising providers like Google analytics for the purposes of statistical analyses of aggregate user behaviour, but we will only provide this information for our marketing purposes;
- The relevant Federal, State, Territory Government and regulatory authorities and other organisations as required or authorised by law

You may at any time opt out of certain service offerings.

We do not disclose your personal information for any secondary purposes unless your consent has been given or as required by law, and we will not sell or license any personal information that we collect from you.

Where the Privacy Act permits us to do so, we may also disclose your credit related information (in respect of commercial credit) to CRBs such as Veda or Dunn & Bradstreet, if you apply for commercial credit or request to increase in your commercial credit limit with SHBC.

Where SHBC collects information that we are likely to disclose to a CRB, please note:

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- the CRBs may include that information in reports provided to SHBC to assist it to assess your creditworthiness;
- if you fail to meet payment obligations in relation to commercial credit or commit a serious credit infringement, SHBC may be entitled to disclose this to the CRB;
- if you are an individual you may access information from SHBC in accordance with this privacy policy and may access this information for the purpose of requesting SHBC to correct the information or make a complaint to SHBC.

Cross Border Disclosure

We may disclose information from time to time to some of the above mentioned overseas recipients. Where information is provided to overseas recipients, we have taken reasonable steps to ensure that the relevant overseas recipient does not breach APP.

The reasonable steps may not apply if you consent to the disclosure of your personal information to an overseas recipient and we reasonably believe that the overseas recipient is subject to laws that are suitability similar to privacy laws in Australia.

If you consent to the disclosure of your personal information to an overseas recipient, the overseas recipient may not be accountable under the Privacy Act, and you will not be able to seek redress for breaches under the Privacy Act.

Relevant recipients that may receive your personal information from us are located in the following countries:

- **United States**

For more information, please contact us:

admin@sydneyhillsbusiness.com.au

Data Quality

We take all reasonable precautions to ensure that your personal information is accurate, complete and up to date. However, the accuracy of that information depends to a large extent on the information you provide.

We recommend that you:

- Let us know if there are any errors in your personal information.
- Keep us up to date with changes to your information.

Data Security

We will take reasonable steps to ensure that your personal information is protected from misuse, interference, loss and from unauthorised access, modification, or disclosure by restricting access to the information in electronic format and by appropriate physical and communications security.

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Our personnel are trained to treat members' and other customers' information with the utmost confidentiality and procedures have been enacted to ensure all computer systems have anti-virus software installed to prevent any hacking or unauthorised access to our computer network.

If a substantial data breach has or may have occurred (for example, your personal information was shared with unauthorised persons) we will notify you as soon as is practicable.

We only keep your personal information for as long as it is required for the purpose for which it was collected or as otherwise required by law. We will take appropriate measures to destroy or permanently de-identity your personal information if we no longer need to retain it. These measures may vary depending on the type of information concerned, the way it was collected and how it was stored.

You Can Access or Correction Your Personal Information

We acknowledge that you have a general right of access to information concerning you, and to have inaccurate information corrected.

Individuals will be able to access and request amendment to their personal information by contacting us at admin@sydneyhillsbusiness.com.au

We will reply to your request for access within 30 days of notification by you.

Upon request for access or correction of your personal information we will provide you with access to your personal information or make corrections as directed, subject to exceptions stated in the Privacy Act. If you would like access, please make your request in writing for security reasons. Members will be able to access and update their contact details via our website www.sydneyhillsbusiness.com.au.

We will provide notification to the APP entity in the event that a request to grant access to personal information is refused we will provide written notice setting out:

- the reasons for the refusal;
- the mechanisms available to complain about the refusal;
- any other matter prescribed by the regulations.

Privacy Statement

We collect and use certain types of personal information about people with whom SHBC deals to operate our activities. These include current, past, and prospective employees, suppliers, trustees, customers, clients, visitors, and others with whom we communicate. Examples of personal information include names, photographs, contact details, gender, and age.

In addition, it may occasionally be required by law to collect and use certain types of personal information to comply with the requirements of government departments for business data (e.g. health and safety statistics).

Personal information will be dealt with properly irrespective of how it is collected, recorded and used – whether on paper, electronically or recorded on other media.

We regard the lawful and correct treatment of personal information as important to successful operations, and to the maintenance of confidence between SHBC and those with whom SHBC deals.

This policy will operate in all locations from which we supply goods and services within Australia. We will ensure that our staff and those acting on our behalf obtain, use and disclose personal information lawfully and correctly. To this end we aspire to comply with the Privacy Act 1988 (Cth) and the 13 Australian Privacy Principles (APPs) contained within the Act in the way we handle personal information.

Implementation

The Policy is available on our website <http://www.sydneyhillsbusiness.com.au/Terms-Conditions/privacy-website> and/or by requesting a copy from us.

We publish guidelines on how to implement this Policy, and all staff and other individuals will be appropriately trained to handle personal information. We will ensure that anyone wanting to make enquiries about handling personal information knows what to do.

We regularly review the way SHBC processes personal information in light of compliance with the Act.

Internet "Cookies"

When you visit our web site, our site may automatically send you a "cookie". In addition, third parties, including internet search engines, may access your "cookie" information by visiting our website.

A cookie is a piece of text sent from a web server to your computer and is used to identify you only by a random number. This information does not personally identify you, but it does tell us that your computer has visited our site and what areas of the site have been browsed.

You can decline cookies by adjusting the "accept cookies" setting in your browser, however this may affect the functionality of the web site.

Our website may also contain links to or from other websites. We are not responsible for the privacy practices of other websites. This privacy policy applies only to the information we collect on our website. We encourage you to read the privacy policies of other websites you link to from our website.

Dealing with unsolicited information

We take all reasonable steps to ensure that all unsolicited information is destroyed or de-identified immediately.

Anonymity when dealing with us

Only where it is practicable to do so, we may allow you the option not to identify yourself when dealing with us.

Collecting sensitive information

We do not collect sensitive information, unless it is specifically relevant and necessary for the purpose of our business activities and functions, and your consent is first obtained. All sensitive information that is collected is used in accordance with this privacy policy.

Government identifiers

We do not use government identifiers (e.g. tax file numbers or Medicare numbers) to identify individuals.

Transfer of ownership

As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganisation, dissolution or similar event, your Personal Information may be part of the transferred assets. You acknowledge and agree that any successor to or acquirer of our business (or its assets) will continue to have the right to use your Personal Information in accordance with the terms of this Privacy Policy.

Lodging a complaint

An individual is entitled to make a complaint about us in respect of an alleged breach of the Australian Policy Principles by contacting us in writing. Upon receipt of such a complaint, we will investigate the complaint and reply in writing to the individual within a reasonable period of time. The validity of the complaint will determine the outcome and the relevant steps needed to be undertaken by us.

If you wish to proceed further with your complaint in relation to an alleged breach of the APP's you can contact the Office of the Australian Information Commissioner on this website:

- <http://oaic.gov.au/privacy/making-a-privacy-complaint>.

Further information on privacy

You can obtain further general information about your privacy rights and privacy law from the Office of the Australian Information Commissioner by:

- calling their Privacy Hotline on 1300 363 992
- visiting their web site at <http://www.oaic.gov.au/>
- writing to:

The Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 1042