

# Privacy

## Introduction

This privacy policy has been published to provide a clear outline of how and when personal information is collected, disclosed, used, stored and otherwise handled by Hartwigs Pty Ltd. The policy relates to personal information collected by any means and by any technology.

Hartwig's treats the handling of your personal information seriously. To that end, Hartwig's has system and procedures in place to protect you privacy in relation to the handling of your personal information. Hartwig's objective is to handle personal information responsibly and provide you with some control over the way your personal information is handled.

Hartwig's abides by applicable privacy principles, including those under the privacy act 1988 in Australia. Those principles relate to the collection, disclosure, use and storage of personal information. Certain exemptions apply under these laws in Australia. Hartwig's may rely on those exemptions despite this policy. Further information about the privacy laws mentioned is available from the relevant Australian privacy regulators.

## Collection of Personal Information

- a. Personal information is information or opinion from which an individual's identity may be reasonably ascertained. The nature of personal information collected by Hartwig's generally includes an individuals name and contact details (including address, phone, fax and e-mail)
- b. Hartwig's also collects other types of personal information from time to time (e.g credit information and drivers license details). Hartwig's will take reasonable steps to notify you the purpose for which the personal information is being collected.
- c. Hartwig's will take reasonable steps to de-identify or destroy personal information when it is no longer required for such functions and activities.
- d. Hartwig's will generally collect personal information from you directly where reasonable and practical to do so. For example, Hartwig's may collect personal information via telephone or letter, or when you provide a resume or enter into an agreement.
- e. There may be other occasions when Hartwig's sources personal information from another company or external third party, including public sources and the parties described below under 'Use and disclosure of Personal Information'. For example, Hartwig's may collect personal information from credit agencies when establishing a credit account.
- f. For security, training, dispute resolution and quality purposes Hartwig's may monitor and record your communications with Hartwig's (including email and telephone) and operate video surveillance devices in Hartwig's premises

## Use and disclosure of Personal Information

- a. Hartwig's may use and disclose your personal information for the purpose for which the personal information was initially collected.

- b. Hartwig's may also use and disclose that personal information for a purpose related to the initial purpose of collection if that other purpose would be within your reasonable expectations.
  - c. Hartwig's may also use or disclose your personal information with your express or implied consent or where the use or disclosure is:
  - d. Required in order to investigate an unlawful activity:
  - e. Required by an enforcement body for investigative activities:
  - f. Necessary to prevent a serious and imminent threat to a persons life, health or safety, or to public health or safety; or
  - g. Otherwise required or authorized by law
- d. Hartwig's may not be able to provide its services and perform its functions without your personal information. For example, Hartwig's may not be able to contact you or make payments to you. Hartwig's relies on its branches to provide goods and services to you, including warranty repairs and maintenance and without your personal information, Hartwig's may not be able to provide and monitor warranty on such goods and services. As with most other businesses, Hartwig's uses third party suppliers who are contracted to provide a range of services including insurance brokering, telecommunications, equipment supply, facilities maintenance, engineering, security, marketing and research, data processing, data analysis, information broking, credit reporting, online computing, printing contact centre, legal, accounting, business consulting, auditing, archival, delivery, mailing, surveillance, investigations, payroll, superannuation, training, , staff benefits travel and hospitality services. Hartwig's aims to co-operate with government agencies and may disclose personal information where appropriate or in response to reasonable requests from such agencies including workers compensation insurer.

### **Personal Information security**

- a. Hartwig's is committed to keeping your personal information secure, and we will take reasonable precautions to protect your personal information from loss, misuse and interference, and from unauthorized access, disclosure and alteration.
- b. Your personal information may be stored in hard copy documents or electronically on our software or system.
- c. Hartwig's maintains physical security over its paper and electronic data stores, such as locks and security systems. Hartwig's also maintains computer and network security using security passwords to control and restrict access to authorized staff for approved purposes.

### **Changes to this Policy**

Hartwig's may change this Policy from time to time for any reason and will update the Policy accordingly.

### **Complaints**

If you believe that your privacy has been infringed then you are entitled to complain. All complaints should initially be in writing and directed to the Privacy Officer.