

# Privacy Policy

**Moffat Group Pty Ltd (ACN 069 691 407)** and its subsidiaries, related entities and affiliates (together, “**Moffat**”, “**we**”, “**our**” or “**us**”) respect your privacy and we are committed to compliance with our obligations under the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (‘APP’s’).

This Privacy Policy has been issued under APP 1. It describes what happens to Personal Information we collect in respect of:

- our clients or prospective clients;
- our suppliers or prospective suppliers; or
- any employee or independent contractors engaged by us or any person who applies to become an employee or independent contractor.

Please take a moment to read this Privacy Policy as it sets out our information handling practices, what information we hold about you and how we collect, use, disclose, keep secure and ultimately destroy that information, through our websites at:

- [www.moffat.com.au](http://www.moffat.com.au)
- [www.moffat.co.nz](http://www.moffat.co.nz)
- [www.moffatusa.com](http://www.moffatusa.com)
- [www.moffat.com](http://www.moffat.com)
- [www.blue-seal.co.uk](http://www.blue-seal.co.uk)
- [www.blue-seal.ca](http://www.blue-seal.ca)

## 1. What Personal Information we collect from you

For the purpose of this Privacy Policy, “Personal Information” is information or an opinion about you, whether true or not, which identifies you or from which your identity can reasonably be ascertained.

The type of Personal Information collected by us may differ depending on whether you are or would like to become a client, supplier, employee or independent contractor. The type of Personal Information we may collect includes (but is not limited to) your name, date of birth, address, mobile and telephone numbers, facsimile number and email address. If applicable, we may also require details of your company’s ABN and/or ACN, financial information including bank account and credit card details, profit and loss statements, balance sheets, your employer details and your occupation.

The Personal Information we collect is what is required for us to be able to provide you with our products and services, to manage and administer the product and service, to assess your application for credit and for incidental purposes. Where you do not wish to provide us with your Personal Information, we may not be able to provide you with requested products or services.

However, where it is unnecessary to collect Personal Information for the purposes of certain activities (for example when taking a survey), you have the option of not identifying yourself or using a pseudonym.

We will collect your Personal Information in a fair and lawful manner, and not in an unreasonably intrusive way. All Personal Information that is collected will be stored on our electronic server, internal computers and in hard copy files.

Where practical, we collect Personal Information directly from you. There may be circumstances in which we collect Personal Information about you from publically available sources and from third parties, including from financial institutions and credit reporting

agencies when you apply for credit.

We destroy or permanently de-identify your Personal Information when it is no longer necessary for its purpose and we are not required by law to keep it.

## **2. How do we collect your Personal Information?**

We will collect your Personal Information in a number of ways including:

- from you when you provide us with this information by telephone or by completing an on-line enquiry through our websites, application forms, customer service satisfaction surveys, contracts or any other document provided by you to us;
- from third parties such as credit reporting agencies, insurance companies or your personal representative;
- from publicly available sources of information; and
- from our own records.

Through our websites we can obtain your Personal Information if you send such information in an email or when you complete an on-line enquiry. When you look at our websites, we may make a record of your visit. The following information may be logged for statistical purposes:

- your internet protocol address;
- the date and time of your visit to our site;
- the pages that you have accessed or downloaded; and
- the type of browser you were using.

Tracking technologies such as cookies may be used on our website to recognise a user's browser each time that user visits our websites. Cookies are pieces of information that a website transfers to a computer's hard disk for record keep purposes. Most web browsers are set to accept tracking technologies such as cookies. These tracking technologies do not purposefully identify the user. If you do not wish receive any cookies you may set your browser to refuse them. However, your use of our websites may be affected.

Please note that our website does not provide systems for secure transmission of Personal Information across the Internet except where otherwise indicated. You should be aware that there are inherent risks in transferring Personal Information over the Internet and that we accept no responsibility for Personal Information provided in unsecured websites.

## **3. Use and disclosure of your Personal Information**

We collect and use your Personal Information for purposes that relate to:

- providing you with our products and services;
- managing and administering the provision of our products and services;
- providing quality assurance for our products and services;
- responding to your enquiries and feedback regarding our business, our products and our services;
- monitoring performance of our business and our employees and subcontractors;
- marketing, promotional and educational activities;
- enforcing the terms and conditions of engagement with you; and
- the management of our database.

We will not use or disclose your Personal Information for any other purpose unless you have consent to that use or disclosure.

Your Personal Information may be shared between Moffat and its related entities. If you do

not wish to receive marketing information you can opt out by contacting our Privacy Officer. Normally we will not disclose your Personal Information to third parties unless:

- you have previously consented or agreed to such disclosure;
- it is necessary to provide you with the goods and services requested and such disclosure is made on a confidential basis;
- it is required by law or required for co-operation with any government authority; and
- it is necessary for any of the purpose mentioned above.

We will not sell, rent or trade your Personal Information without your prior consent where that consent is required by law. However, by trading and communicating with us, you consent to our use and disclosure of your Personal Information incidental to a sale of our business to a third party or where we outsource duties including database management to an external service provider for the purpose of rendering the required services.

We, and our agents, will only use and disclose your Personal Information in accordance with our purposes listed above and as permitted by the APP's and the Privacy Act.

#### **4. Your consent**

You consent to your Personal Information being used in accordance with this Privacy Policy by requesting our services or those of our sub-contractors by making enquiries via telephone or by visiting our websites or participating in an on-line enquiry. We will endeavour not to use or disclose your Personal Information in a way, which is unreasonable contrary to your expectations. If you would prefer that we not use your Personal Information in any way set out in this Privacy Policy please contact us. However, you should be aware that if you do not consent to certain uses and disclosures of your Personal Information, we may not be able to provide our products and services to you.

#### **5. Quality of your Personal Information**

We rely upon the accuracy of your Personal Information to provide our products and services to you. To assist us with this, please contact us immediately if any of your Personal Information ceases to be current.

Similarly, if for any reason you believe that the information we have about you is not accurate and complete, contact us and we will make the appropriate correction. If we believe that the information we have about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will make the appropriate correction. If your Personal Information that we have previously disclosed to another APP Entity is corrected on our records, at your request we will notify that other APP Entity of the correction.

We will endeavour to respond to your request within a reasonable period after the request is made and may, if permitted by law, refuse to change our records of your Personal Information. If this occurs, we will provide you with reasons why this has occurred.

#### **6. Access to Personal Information**

You may access the Personal Information that we hold about you upon request and on reasonable notice. However there are some circumstances in which we may refuse to provide access or only provide partial access to this information. If your request for access is

not granted, we will explain our reasons to you.

A nominal fee may apply to enable us to recover the reasonable costs of making such information available to you.

## **7. Security of your Personal Information**

We regard the security of your Personal Information as paramount. To this end, we take all reasonable steps to protect your Personal Information from loss, interference, misuse, unauthorised access, modification or disclosure.

Only authorised people within our organisation are entitled to access your Personal Information for approved purposes. All our employees and agents are required to sign a confidentiality agreement as a condition of their employment.

## **8. Changes to our Privacy Policy**

From time to time we may decide to amend or update this Privacy Policy. When this occurs we will post the new version of the Privacy Policy on our website. We encourage you to periodically view this Privacy Policy so that you remain informed as to how we are protecting your Personal Information.

## **9. Transfers of Personal Information overseas**

As the internet is a global environment, using the internet to collect and process Personal Information necessarily involves the transmission of that information worldwide. We will also share your Personal Information with the members of Moffat which are located in Australia, New Zealand, the United Kingdom and the United States of America. By trading and communicating with us, you acknowledge and agree to us using and disclosing your Personal Information in this way.

## **10. How to contact us**

Should you have any queries or concerns in relation to our information handling practices, or if you wish to discuss any aspect of this policy, please do not hesitate to contact our Privacy Compliance Officer Peter R Barnes on +61 3 9518 3888 or fax us on +61 3 9518 3818. You may also write to us at:

Moffat Pty Limited  
740-742 Springvale Road  
Mulgrave VIC 3170  
Attn: Peter R Barnes  
E-mail: [peter.barnes@moffat.com.au](mailto:peter.barnes@moffat.com.au)

## **11. How we handle complaints**

Any complaint made to us in connection with this privacy policy and our information handling practices will be directed to our General Manager - Finance where it will be assessed giving due regard to the nature of your complaint, your circumstances and our

ability to address the issue in question. Irrespective of our decision, we will respond to your complaint within a reasonable period of time.

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