

## **Privacy and Credit Reporting Policy**

This is the privacy and credit reporting policy of Flow Smart Pty Ltd ACN 114 328 040 ABN 20 114 328 040 (“we, us, our”).

We value your privacy and are committed to ensuring that we collect, use, hold and disclose your personal information in accordance with the *Privacy Act 1988* (Cth), the *Privacy (Credit Reporting) Code 2014* and the *Australian Privacy Principles*.

This privacy and credit reporting policy may be updated from time to time by us as our business changes and if laws or regulations change.

Our most recent policy will be available on our website **[www.flowsmart.net.au/privacy-policy](http://www.flowsmart.net.au/privacy-policy)**.

### **What kinds of personal information do we collect?**

In the course of providing our goods and/or services (or for other activities associated with providing our services), we may collect the following kinds of personal information (information that personally identifies you):

- Your full name and/or former name.
- Date of birth.
- Gender.
- Marital status.
- Residential address or previous two residential addresses
- The name of your employer or last known employer.
- Driver’s Licence number or other identification information.
- Email address
- Information about any real property owned by you.
- Information made available to us by you via our social media account services (Facebook, YouTube, Google+, twitter, LinkedIn and any similar service).
- Information about your credit or trading history.
- Your transaction and repayment history with us.
- Banking details.

We may also collect certain types of sensitive information from you if you access our services, being:

- Your race or ethnic origin
- Religious beliefs or affirmations
- Sexual orientation or practices
- Information about your health
- Details of any criminal record

We do not generally collect sensitive information. We will only collect sensitive information where that is reasonably necessary for us to provide the goods and/or services to you and only with your consent.

### **How do we collect your personal information?**

We collect your personal information directly and indirectly.

We may collect personal information from you directly if you:

- Contact us (via mail, phone, email or website enquiry). We may keep a record of your correspondence with us.
- Sign up to our online mailing list.
- Fill out an account application or contact inquiry form.
- Comment or interact with us on our social media accounts.
- Purchase our services.
- Provide feedback in relation to our services.
- Communicate with our sales representatives and agents.
- Interact with us through marketing and business development events.

We may collect information about you from a third party where necessary to provide you with services or to assess any application for credit with us or from referrals.

We may also collect personal information about you when you use and access our web sites through the use of “cookies”. A cookie is a small text file that the website may place on your computer. Cookies may be used, among other things, to track the pages you have visited, to remember your preferences and to store personal information about you.

You can adjust your internet browser to disable cookies or opt to be warned when cookies are being used. However, if you disable cookies, you may not be able to access certain areas of our websites or take advantage of the improved web site experience that cookies offer.

When you visit our website, our web servers may record other information about or relating to you, such as the time and date of your visit or the IP address assigned to the computer you are using to access the website. In many cases, we cannot and do not use this information to identify you personally – rather, we simply use this information to track and improve the performance of the websites.

### **How do we hold your personal information?**

We will take reasonable steps to protect your personal information while it is in our control, but please be aware that despite our best efforts, no data security or other measures can guarantee 100% security.

We keep the personal information you provide to us:

- If it is in hardcopy form, in secure buildings with secure systems and processes.
- If it is in electronic form, in secure systems protected by passwords, virus protection software and firewalls.

Certain personal information about you may be linked with other information about you, including credit information. Only our authorised officers can access your personal information and our databases are protected by passwords.

We will take reasonable steps to de-identify or destroy your personal information if we no longer require it. This includes requesting that any backup copies of information held by third parties are returned to us, de-identified or destroyed, and taking steps to ensure that this has occurred. We note that residual copies of information may persist for up to 60 days due to the backup systems that we use and that are used by our third party cloud computing provider.

## **How do we use your personal information?**

We collect your personal information to:

- Provide you with services.
- Improve our business operations and services.
- Send you marketing or advertising material about our services.
- Notify you about changes or updates to our services.
- Confirm your identity.
- Manage and respond to any complaints or queries you have in relation to our services.
- Comply with laws and regulations.
- Any other purpose permitted or required by law

## **Do we disclose your personal information?**

We do not sell your personal information to third parties.

We may disclose your personal information to the following persons:

- Sub-contractors or other service providers for provision of services.
- Service providers that facilitate our marketing and advertising campaigns and host our servers.
- Billing providers to facilitate collection of payment from you.
- Our professional advisers (e.g. lawyers, accountants, financiers) in connection with receiving advice from them.
- A debt collection agency in connection with recovery of any debts owed to us by you.
- Any related body corporate of us in connection with the supply of our services and operation of our business.

We may also disclose your information where required or permitted by law to do so or to comply with a request from a government or regulatory agency.

We do not disclose your personal information overseas.

## **Third party websites**

Our website may contain links to other websites. These links are provided solely for your convenience. If you submit personal information to or via any linked website, the privacy principles applying to that information are outside our control. You should check the privacy statement of the linked website before submitting information to or via that site.

## **Anonymity**

You may deal with us by using a pseudonym, or by remaining anonymous.

However, if you use a pseudonym or remain anonymous, we may not be able to provide you with our services or handle your enquiries or complaints to the fullest extent.

We may also be required by law to identify you when we supply you with services.

## **How do you access, update and correct your personal information?**

If you would like to access, update and correct any personal information held by us about you, please contact:

## **Privacy Officer**

info@flowsmart.com.au

(02) 6962 7262

42 Bridge Road Griffith NSW 2680

## **What happens if you have a complaint about the way we have handled your personal information?**

If you have a complaint about the way we have handled your personal information, please contact us in writing by post or email with full details of the circumstances giving rise to the complaint.

## **Privacy Officer**

info@flowsmart.com.au

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42 Bridge Road Griffith NSW 2680

We will endeavour to resolve your complaint within 30 days of you contacting us in writing.

If you consider that we have not adequately resolved your concerns within that time, you may contact the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)).

Phone: 1300 693 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Post: GPO Box 5218

Sydney, NSW, 2001

## **Credit Reporting Policy**

This credit reporting policy applies if you are applying for a credit account with us.

This credit reporting policy relates to our management of credit information and credit eligibility information (collectively, **credit-related personal information**) held by us in relation to you.

We are bound by the Credit Reporting Privacy Code contained in the Privacy (Credit Reporting) Code 2014 in respect of the credit-related personal information held by us about you.

## **What kinds of credit-related personal information do we collect?**

The kinds of credit-related information we may collect about you include:

- Your full name and/or former name.
- Date of birth.
- Gender.
- Marital status.

- Residential address or previous two residential addresses
- The name of your employer or last known employer.
- Driver's Licence number or other identification information.
- Email address
- Information from a credit reporting body or trade referees, including:
  - The number of credit enquiries made about you in connection with application for commercial credit or in relation to a credit guarantee.
  - The amount and type of commercial credit sought by you from other credit providers
  - Any credit defaults made against you.
  - Whether you have committed a serious credit infringement.
- Information from any publicly available source about you, including about:
  - Whether you have been listed on the National Personal Insolvency Index.
  - Any court proceedings against you.
  - Any other publicly available information about your credit worthiness.

### **How do we collect your credit-related information?**

We collect the credit-related information from you directly if you fill out an account or credit application with us.

We may collect the credit-related information from others such as a credit reporting body or from trade referees that you have provided to us where you have provided your consent.

We may also collect credit-related information from publicly available sources.

### **How do we use your credit-related information?**

We use the information for internal management purposes to:

- Determine whether to provide or continue to provide you with credit
- Assess the suitability of any trade credit guarantee provided in connection with credit provided to us.

### **How do we hold your credit-related personal information?**

We keep any credit-related personal information you provide to us:

- If it is in hardcopy form, in secure buildings with secure systems and processes.
- If it is in electronic form, in secure systems protected by passwords, virus protection software and firewalls.

### **How do we disclose your credit related information?**

We may disclose your information to the following persons or in the following situations:

- To Debt collectors or mercantile agents for the purpose of recovering any debts owed to us.
- To a person in connection with that person provided security or a guarantee in connection with any credit provided to you.
- To a person or their professional or legal advisers in connection with the assignment of any debts owed to us by you.
- To any related body corporate in connection with the management of the provision of credit to you.

- To any person acting as our agent in connection with the provision of credit to you.
- Where required to comply with or permitted by the law or to comply with a lawful request from an authorised investigative agency or regulatory body.
- To the following credit reporting bodies: including Equifax etc.

### **How do you access, update and correct your credit-related personal information?**

If you would like to access, update and correct any credit-related personal information held by us about you, please contact:

#### **Privacy Officer**

info@flowsmart.com.au

(02) 6962 7262

42 Bridge Road Griffith NSW 2680

### **What happens if you have a complaint about the way we have handled your personal information?**

If you have a complaint about the way we have handled your credit-related personal information, please contact us in writing by post or email with full details of the circumstances giving rise to the complaint.

#### **Privacy Officer**

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We will endeavour to resolve your complaint within 30 days of you contacting us in writing.

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