

HUXFORD REFRIGERATION PRIVACY POLICY

Huxford Refrigeration

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Phone: 1800 489 367

Email: sales@huxford.com.au

Web: www.huxford.com.au

We "Huxford Refrigeration" reserve the right to modify and/or update any of our "Terms & Conditions" or "Policies" at any time. Please refer to our website "terms and conditions" page link (also found in the footer of all website pages) for the latest versions and more information:

<http://huxford.com.au/terms-and-conditions> .

Below is the list of Huxford Refrigeration Terms & Conditions and/or Policies:

- **Huxford Refrigeration Terms & Conditions of Sale**
- **Huxford Refrigeration Terms & Conditions of Warranty**
- **Huxford Refrigeration Terms & Conditions of Website**
- **Huxford Refrigeration Privacy Policy (this document)**

Huxford Refrigeration Privacy Policy

Privacy Statement and Policy

This policy sets out how Huxford Refrigeration ABN 23 138 853 773 (“Huxford Refrigeration”, “we” “us”) collects, uses and discloses your personal information, credit information and credit eligibility information (“credit related information”), including information about your applications for credit and credit accounts with Huxford Refrigeration and your credit reporting information that we derive from credit reporting bodies (CRBs) and other credit providers.

Huxford Refrigeration appreciates the importance of protecting the personal information and credit related information that you have provided us in the course of business. This Privacy Policy is based on Part IIIA of the Privacy Act 1988 (“the Act”), complies with the Australian Privacy Principles set out in the Privacy Amendment (Enhancing Privacy Protection) Act 2012, and explains how your personal information and credit related information will be managed when dealing with Huxford Refrigeration.

When you engage Huxford Refrigeration to provide you with any goods or services, apply or complete an application for commercial credit, or communicate with Huxford Refrigeration through email, by telephone, in writing, or use any of Huxford Refrigeration other services, including the Huxford Refrigeration website, you agree to the use and disclosure of your personal information and credit related information in the manner described in this policy.

1. The kinds of credit related information that Huxford Refrigeration may collect (where applicable)

Huxford Refrigeration may collect and hold various types of personal information and credit related information, including;

- your identity particulars such as; your name, address (and previous addresses), occupation and name of employer;
- email, user ID’s and passwords;
- records of your communications with Huxford Refrigeration;
- personal website usage information;
- any goods, services or credit provided to you;
- court proceedings information, personal insolvency information and credit-related publicly available information;
- that you have applied for commercial or consumer credit and the amount;
- that we and other credit provider are or have been a credit provider to you;
- payments which become overdue more than 60 days and for which debt collection action has commenced;
- advice on payments being no longer overdue;
- advice that cheques drawn by you have been dishonoured more than once;





- in specified circumstances that in our opinion you have committed a serious credit infringement (that is, acted fraudulently or shown an intention not to comply with your credit obligations);
- that credit provided to you by us has been paid or otherwise discharged;
- court proceedings information, personal insolvency information and credit-related publicly available information;
- scores, ratings, summaries, evaluations and other information relating to your credit worthiness, which is derived by us or by CRBs.
- (account customers only) your bank account details and credit card information;

Huxford Refrigeration does not and will not use a Commonwealth Government identifier (such as tax file numbers, driver's licence numbers) as a method of identifying an individual or business. Subject to the Privacy Act, Huxford Refrigeration will not provide such an identifier to a third party without the individual's consent, unless:

- disclosure is necessary for Huxford Refrigeration to fulfil its obligations to the relevant agency;
- it is required for health or other emergency reasons;
- it is required to investigate suspected fraud or unlawful activity;
- it is required or authorised by law;
- it is required for law enforcement.

2. The purpose for collecting, holding, using and disclosing your personal and credit related information

The primary purpose of collecting, holding and using your credit related information is for Huxford Refrigeration business operation and as permitted by law which include the use, holding and disclosure of your credit related information for activities, such as:

- administering, monitoring, evaluating and managing the credit arrangement you have with us;
- collection of payments under your credit arrangement, internal accounting and administration;
- to assist you to avoid defaulting on your credit-related obligations;
- to undertake debt recovery and enforcement activities, and to deal with any credit infringements;
- providing you with information about other products and services offered by us or a related Huxford Refrigeration;
- complying with regulatory requirements;
- managing our relationship with you;
- protecting you and us from error or fraud;
- to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend our legal rights;
- to participate in the credit reporting system and providing information to CRBs as permitted by Part IIIA of the Privacy Act and the Credit Reporting Code of Conduct.

Huxford Refrigeration will generally collect and use your personal information for the primary purpose of:

- Huxford Refrigeration general business operations;



- providing you with Huxford Refrigeration goods and services and entering into transactions with you;
- communicating with you;
- responding to your enquiries about our goods and services;
- meeting Huxford Refrigeration legal and regulatory requirements;
- conducting, improving and developing a business relationship with you;
- marketing (such as providing individuals with information about our products and promotional notices and offers); and
- improving Huxford Refrigeration website.

Your credit related information and personal information is collected by lawful and fair means in a several ways, including:

- where practicable, directly from you or from a person acting or authorised to act on your behalf;
- if necessary, for Huxford Refrigeration operations;
- from CRBs and other credit providers; and
- publicly available information.

Huxford Refrigeration takes reasonable steps to ensure that you are aware of:

- the likely use of the information including your credit related information;
- the right of access to the information including your credit related information;
- the identity and contact details of the organisation collecting your information including your credit reporting information is being collected from or disclosed to;
- any law requiring collection of the information including your credit related information; and
- the main consequences of failure to provide any information including your credit related information.

3. How we may disclose your credit related information

Huxford Refrigeration may disclose your personal information and your credit related information: for the primary purpose for which it was collected such as those described above i.e. for Huxford Refrigeration operations, which includes, assessing a credit application form application by you for commercial credit;

- where you would reasonably expect this;
- where you have consented;
- to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights;
- to other credit providers;
- to CRBs where the Privacy Act permits us to do so. We share credit information with the following CRBs:

Dun & Bradstreet
PO Box 7083 Sydney NSW 2001
(tel): 02 8270 2940



- to organisations that perform credit assessment, management and debt collection activities on our behalf;

Huxford Refrigeration does not disclose your credit relation information for any secondary purposes unless your consent has been given or as required by law.

When we share personal information with third parties, we take reasonable steps to ensure that these third parties will protect the personal information and use it only for the purposes for which it was disclosed. We also reserve the right to disclose or transfer any personal information collected on the Huxford Refrigeration website:

- to protect the security of the Huxford Refrigeration website;
- to protect ourselves against liability;
- to respond to subpoenas or other judicial processes;
- if we believe in good faith that the law requires it; or
- in connection with any sale, assignment, or other transfer of all or a part of Huxford Refrigeration or Huxford Refrigeration or any business.

4. Accurate and up-to-date information

Huxford Refrigeration takes reasonable steps to ensure that your information is accurate, complete, up-to-date and not misleading by updating its records whenever true and correct changes to the information come to its attention.

If you believe your information is incorrect, incomplete or not current, you can request that we update this information by contacting our Privacy Officer. To contact our Privacy Officer please see contact details below.

Huxford Refrigeration will correct information it has about you if it discovers, or you are able to show to a reasonable standard, the information is incorrect. If you seek correction and Huxford Refrigeration disagrees that the information is incorrect, Huxford Refrigeration will provide you with its reasons for taking that view. Huxford Refrigeration disregards information that seems likely to be inaccurate or out of date by reason of the time that has elapsed since it was collected or by reason of any other information in its possession.

5. Using our Website/s

As with most websites, when you visit Huxford Refrigeration website or use an application on Huxford Refrigeration website, Huxford Refrigeration may record anonymous information such as IP address, time, date, referring URL, pages accessed and documents downloaded type of browser and operating system. Also refer to the **Huxford Refrigeration Terms & Conditions of Website** document.

Huxford Refrigeration uses:



- **IP Addresses.** An Internet protocol (IP) address is a unique identifier automatically assigned to a user's computer when logging onto the Internet. IP addresses are used to identify server problems, administer a website, and compile aggregated statistics for marketing and research purposes. Huxford Refrigeration websites capture IP addresses.
- **Navigational Data.** Navigational data includes log files and clickstream data. Navigational data can identify a user's Web browser and operating system, when and for how long a user visits a website, what pages a user views on a website, and the address of the website that the user was visiting previously. This information is typically used to administer a website, improve website content, and compile aggregated statistics for marketing and research purposes. Huxford Refrigeration websites collect navigational data.
- **Cookies.** "Cookies" are small text files sent from a website to the hard drive of a user's computer to store bits of information related to that user. Cookies can store a variety of information, including IP addresses, navigational data, server information, and data transfer times. There are two kinds of cookies: session cookies, which are deleted once a user closes his or her Web browser window or otherwise turns off his computer, and persistent cookies, which remain on a user's computer hard drive until deleted.
- Session cookies are typically used to aid in website navigation and to collect statistical information.
- Persistent cookies can also aid in website navigation and collecting statistical information, but are typically used to customize a website for a user, such as by storing passwords and preferences so that users do not have to re-enter them each time they visit a website.

Huxford Refrigeration websites use session cookies and persistent cookies. You may adjust your internet browser to disable cookies. If cookies are disabled you may still use the Huxford Refrigeration websites, but the website may be limited in the use of some of the features:

- **Internet Tags:** "Internet Tags" (also known as single-pixel GIFs, clear GIFs, invisible GIFs, and 1-by-1 GIFs) are similar to cookies, but they are smaller and are typically used to collect information such as the IP address and browser type related to the user's computer. Huxford Refrigeration websites use "Internet Tags."

The Huxford Refrigeration websites may contain links to or from other websites. Huxford Refrigeration is not responsible for the privacy practices of other websites. This privacy policy applies only to the information we collect on the Huxford Refrigeration website. We encourage you to read the privacy policies of other websites you link to from Huxford Refrigeration website.

6. Stop Communications / Unsubscribe

If you are receiving marketing communications (brochures, e-mails, etc.) from us or anyone else with whom we may share personal information, as described in this policy, and you no longer wish to receive such communications, please send an email to email: sales@huxford.com.au and advise what communications you would like to unsubscribe from. All Huxford Refrigeration emails contain an unsubscribe link in the footer of the email, as required by Australian law, you can also use this to unsubscribe or stop communications from us at any time.



7. Holding and the security of your personal and credit related information

Transmissions over the Internet are never 100% secure or error-free. As a result, we do not, and cannot, guarantee the security, accuracy, or completeness of the personal information we gather from you. You should be aware that e-mail submitted through the Huxford Refrigeration websites (including forms submitted via e-mail) may not be secure or encrypted, so you should take particular care in deciding what information you send via e-mail. However, once we receive any personal information you provide to us, we may hold your information in physical form or in electronic form on our systems or the systems of our service providers. Huxford Refrigeration protects your information including your credit related information from misuse or loss by restricting access to the information in electronic format and by appropriate physical and communications security. Any information destroyed is disposed of in a manner that protects the privacy of information in an appropriate manner.

8. Access to your personal information

Huxford Refrigeration acknowledges that you have a general right of access to information we hold concerning you, and to have inaccurate information corrected. You are able to access the information including your credit related information we hold about you by contacting our Privacy Officer. If access is refused to your information, we will give you a notice explaining our decision to the extent practicable and your options.

Huxford Refrigeration reserves the right to deny access to personal information, to the extent permitted by law, if providing access:

- could pose a possible threat to life or health;
- could cause an unreasonable impact on the privacy of others;
- would be in response to a frivolous or vexatious request;
- relates to existing or anticipated legal proceedings which could be prejudiced as a result;
- relates to existing or anticipated commercial negotiations involving Huxford Refrigeration and Huxford Refrigeration legitimate commercial interests could be prejudiced as a result;
- is in any way unlawful;
- could in any way prejudice law enforcement or security;
- could prejudice the prevention, detection or investigation of seriously improper conduct, either within or external to Huxford Refrigeration operations.

9. Anonymity when dealing with Huxford Refrigeration

Huxford Refrigeration allows individuals the option not to identify themselves when dealing with it, only where it is practicable. Huxford Refrigeration also reserves the right to refuse service to any persons or businesses they cannot satisfactorily identify, or suspects of fraudulent activity.

10. Dealing with unsolicited information



Huxford Refrigeration takes all reasonable steps to ensure that all unsolicited information is destroyed immediately.

11. Cross border disclosure

Any personal information and credit related information provided to Huxford Refrigeration may be transferred to, stored by or disclosed to an overseas recipient. For example, Huxford Refrigeration may use a server hosted overseas to store data, which may include your personal information.

Huxford Refrigeration will take reasonable steps, in the circumstances, before your personal information and credit related information is disclosed to an overseas recipient, to ensure that the overseas recipient does not breach privacy laws in relation to your personal information and credit related information ("the Required Steps").

The Required Steps do not apply if you consent to the disclosure of your personal information and credit related information to an overseas recipient. By supplying your personal information and credit related information to Huxford Refrigeration, you consent to the disclosure of your personal information to an overseas recipient and agree that the Required Steps do not apply.

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

12. Collecting sensitive information?

Huxford Refrigeration does not collect sensitive information unless it is specifically relevant and necessary for the purpose of Huxford Refrigeration business operation and your consent is first obtained. All sensitive information is collected and used in accordance with this privacy policy. Huxford Refrigeration does not use government identifiers (e.g. tax file numbers) to identify individuals.

13. Complaints and disputes

We acknowledge that you have a general right to ensure your personal information and credit-related information is accurate and up-to-date as well as the general right of access to information concerning you, and to have inaccurate information corrected. If you have reason to believe that we have not complied with our obligations relating to your information or your credit-related information under Part IIIA of the Privacy Act and the Credit Reporting Code, please refer any complaint to queries to our Privacy Officer (details below).

We will ensure your complaint is handled by our Privacy Officer in an appropriate and reasonable manner. Where necessary we may consult with a credit reporting body or another credit provider in



order to deal with your complaint. A written notice of our decision regarding your complaint will be provided to you.

If you are not satisfied with our response or the way your complaint was handled you may refer your complaint to the relevant external dispute resolution (EDR) scheme.

14. Who should you contact for further information?

For further information please refer any queries about privacy issues to our:

Privacy Officer
Huxford Refrigeration

Phone: **1800 489 367**
Email: sales@huxford.com.au

15. How this policy changes

This policy may change from time to time. A current version of this policy will be published on the footer of any Huxford Refrigeration website page (or visit the following link: <http://huxford.com.au/terms-and-conditions>) or may be obtained free of charge upon request.

16. Summary

This **Privacy Policy** is provided by Huxford Refrigeration Australia, please direct any questions or comments to:

Privacy Officer
Huxford Refrigeration

Phone: **1800 489 367**
Email: sales@huxford.com.au

