

PRIVACY POLICY

1 Privacy Act

- 1.1 To the extent that C. R. Brice and R. R. McDermid trading as CnR Woodworking and/or Futura Designs (ABN 73 420 042 047), of 184 Cudmore Terrace, Henley Beach SA 5022 (**we, us, our**) are organisations and "APP Entities" for the purposes of the *Privacy Act 1988* (Cth) (**Act**), and consequently bound by the Australian Privacy Principles contained in the Act, we adopt this Privacy Policy.
- 1.2 We understand that your privacy is important and we are committed to safeguarding personal information about individuals that we handle. This Privacy Policy describes generally how we manage this personal information and protect privacy, including how we comply with the Act and the Australian Privacy Principles.
- 1.3 This Privacy Policy is intended to provide a general overview of our policies in respect of the handling of your personal information. "Personal information" is essentially information or an opinion about an identified or reasonably identifiable individual.
- 1.4 This Privacy Policy is intended to cover most personal information handled by us, but is not exhaustive. Other policies may override or complement this Privacy Policy in certain circumstances. For example, when we collect personal information from you, we may advise a specific purpose for collecting that personal information, in which case we will handle your personal information in accordance with that purpose. If you have any queries about our handling of your personal information, please contact us for further information.

2 Collection of personal information

- 2.1 We may collect your personal information throughout the course of your interaction with us (for example, if you obtain products or services from us, subscribe to our mailing list, fill out an online contact form, engage with our online marketing or submit an enquiry to us). The personal information that we may collect and hold about you depends on your dealings with us. Generally, we may collect:
 - (a) your name and address, email address and telephone number;
 - (b) payment details;
 - (c) business details including in relation to your business operations and any products or services you may purchase from us; and
 - (d) other personal information that we require or that you volunteer to us.
- 2.2 Generally speaking, we collect personal information so that we can provide better products and services to you and ensure that you have convenient access to our products and services.
- 2.3 We will collect your personal information directly from you, unless it is unreasonable or impracticable to do so. If circumstances require, we may collect personal information about you from third parties or publicly available resources. All personal information we collect is limited to that which is reasonably necessary for our functions or activities.
- 2.4 We receive any personal information that you provide to us from third parties (for example, an employee of your business) on the understanding that we have the relevant individual's consent for us to collect and handle their personal information in accordance with this Privacy Policy.
- 2.5 When collecting your personal information, we will take reasonable steps to make you aware of the purposes for which we are collecting it, the types of organisations to which we would usually disclose it, whether we are likely to disclose it to overseas recipients (and where practicable the countries in which they are located), whether there are laws or court/tribunal orders which require or authorise us to collect it, and the main consequences for you if you fail to provide it to us. This Privacy Policy provides these details as they typically apply in most cases, however different details may apply depending on our specific interaction with you. If we do not notify you of such other details, the information in this Privacy Policy applies.

2.6 If you fail to provide personal information requested by us, or if the personal information you supply is incorrect or incomplete, there may be a range of consequences, for example we may be unable to process or respond to your request. There will not usually be Australian laws or court/tribunal orders which require or authorise us to collect your personal information.

2.7 We do not generally collect sensitive information. If we do collect sensitive information (which may include race, ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships or details of health or disability) from you, we will only do so with your consent and if the information is reasonably necessary for one of our functions or activities. We will assume you have consented to us collecting, using and disclosing (in accordance with this Privacy Policy) all information that you provide to us, including any sensitive information, unless you tell us otherwise at the time of collection.

3 Use of personal information

3.1 We will generally only use your personal information for the purpose for which we collected it, and for related purposes we consider would be within your reasonable expectations.

3.2 We generally use personal information for the following purposes (as applicable in the circumstances):

- (a) to provide products or services to you or for your benefit;
- (b) to facilitate the provision of products or services to you by any other party that you would reasonably expect that we may engage to provide such products or services;
- (c) to provide information that you request, to respond to your enquiries, or otherwise achieve the purpose for which you have contacted us;
- (d) to handle payments;
- (e) to assess your eligibility for credit terms;
- (f) to provide you with marketing and promotional material regarding our products or services, including newsletters or other materials;
- (g) to seek feedback from you and perform market research, so that we can gauge your satisfaction with our products or services;
- (h) for our general business operations (such as maintenance of our business records and compliance with our legal and insurance obligations); and
- (i) to engage in other activities where required or permitted by law.

3.3 By providing us with your personal information, you consent to us using your personal information for these purposes.

3.4 You agree that we may send you marketing or promotional communications by post or by electronic means (including email and SMS). You may request not to receive such material from us by contacting us or by using the opt-out function provided for in those communications. If you do not opt-out in either of these ways you will be taken to have consented to receiving such communications from us. Opting in or out of receiving such communications from us may not affect whether you receive similar communications from our franchisees.

3.5 There are no consequences of opting-out of receiving our marketing and promotional communications except that you will no longer receive them, and you may elect to re-join our marketing list at a later stage if you wish.

3.6 Where we propose to use your personal information for a purpose other than as outlined above, we will seek your permission (unless we are required or permitted by law to do so without seeking consent).

4 Storage of personal information

- 4.1 We take reasonable steps to protect your personal information from misuse, interference and loss as well as unauthorised access, modification or disclosure.
- 4.2 For example, information stored on our computer network is protected by security features and procedures. We undertake regular monitoring of our practices and systems to ensure the effectiveness our security policies and identify and implement improvements where appropriate.
- 4.3 We may make use of cloud-based services for our business systems. Our data may be stored with these cloud providers in locations outside of Australia.
- 4.4 Generally, we will take reasonable steps to destroy or permanently de-identify your personal information as soon as it is no longer required by us. We may retain your personal information where we are required or permitted to do so by law, such as for insurance, legal or corporate governance purposes and for the prevention of fraud. Your personal information may also be retained in our IT system back-up records.

5 Disclosure of personal information

- 5.1 We will generally only disclose your personal information for the purpose for which we collected it, and for related purposes we consider would be within your reasonable expectations.
- 5.2 We may disclose your personal information to the following third parties (as applicable in the circumstances):
- (a) certain suppliers that provide services to us (for example, subcontract product manufacturers, market research companies or other service providers). We generally ensure such organisations are contractually required to ensure that information we disclose is used only for the limited purposes for which we provide it;
 - (b) credit reporting bodies, in accordance with section 7 below; or
 - (c) contractors that we engage as part of providing services to you.
- 5.3 We are not generally likely to disclose personal information to overseas recipients, except with your consent or where we are required to or authorised to do so by law.

6 Access to and correction of personal information

- 6.1 You may contact us to request access to or correction of the personal information we hold about you. We may refuse to allow access or to amend your personal information if we are legally required or entitled to do so. If we do so, we will provide you with written reasons for the refusal (unless it is unreasonable to do so) together with information about the options available to complain about the refusal.
- 6.2 We may require you to pay certain costs in order to access your personal information held by us. We will advise the amount payable (if any) once we have assessed your application for access. We will not however charge a fee for you to lodge a request for access to or correction of your personal information.
- 6.3 If you lodge a request for access to your personal information, we may fulfil that request in any of a range of ways (for example, by supplying you with a copy of that personal information or providing you with the opportunity to inspect our records). We may require you to comply with certain procedures before we allow access to or amendment of your personal information to ensure the integrity and security of information that we hold. Depending on the nature of your request, this may include completing a personal information request form or otherwise verifying your identity to our satisfaction.
- 6.4 We will take reasonable steps to ensure that the personal information that we collect is accurate, up-to-date and complete and the personal information we use and disclose is accurate, up-to-date, complete and relevant. If we are satisfied that any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will amend our records accordingly.

6.5 Please notify us if your personal details change so that we may keep our records current.

7 Credit information

7.1 If you are an individual we may disclose your personal information, including your credit eligibility information, to a credit reporting body in order to seek a copy of your consumer credit report.

7.2 We may disclose your credit eligibility information in order to:

- (a) assess an application by you for consumer credit (including a request to defer payment for goods or services) or commercial credit (where you have consented to us obtaining your consumer credit report for that purpose);
- (b) enable us to collect any overdue payments that relate to consumer credit provided by us;
- (c) assess whether to accept you as a guarantor in relation to an application for credit made by someone else (where you have consented to us obtaining your consumer credit report for that purpose).

7.3 You consent to us and our agents making such enquiries as we deem necessary to investigate your credit worthiness from time to time including (without limitation) with other entities which in our opinion you may have had dealings with, your bankers, any credit provider or credit reporting body.

8 Online privacy

8.1 This section of our Privacy Policy sets how we handle your personal information in respect of online services provided by us (which includes any services provided by us via the Internet, such as our websites, and also includes email or other forms of communications).

8.2 Automatic server logs

8.3 Our servers may automatically collect various details when you use our website, including:

- (a) your IP (Internet Protocol) address (generally, an identifier assigned to your computer when it is connected to the Internet);
- (b) the operating system and Internet browser software you are currently using; and
- (c) the data you access (such as web pages or other document files or software), and the time that you access it.

8.4 We do not attempt to identify individuals using this information, and only use it for statistical analysis, system administration, and similar related purposes. This information is not disclosed to any other party.

8.5 Cookies

8.6 Our websites may use "cookies", which identify your computer to our servers when you visit our websites. Our websites may store cookies on your computer in order to improve and customise your future visits to the websites. By using cookies, our sites can provide customised content to you. If you do not want information collected through the use of cookies, you may be able to configure your Internet browser to disable cookies.

8.7 We do not attempt to specifically identify and track individuals using cookies.

8.8 Email and messages

8.9 We may collect personal information from you (such as your name and email address, and any other personal information you volunteer) if you send us an email or other form of correspondence. We will use this to contact you to respond to your message, to send you information that you request, and for other related purposes we consider are within your reasonable expectations. We will not use or disclose any such personal information for any other purpose without your consent.

8.10 Storage and transmission of personal information online

8.11 If you provide any personal information to us via our online services (including email or other form of correspondence) or if we provide such information to you by such means, the privacy, security and integrity of this information cannot be guaranteed during its transmission unless we have indicated beforehand that a particular transaction or transmission of information will be protected (for example, by encryption).

8.12 Other online services

8.13 If any of our online services (including any email messages or other form of correspondence we send to you) contain links to other online services that are not maintained by us, or if other services link to our online services, we are not responsible for the privacy practices of the organisations that operate those other services, and by providing such links we do not endorse or approve the other services. This Privacy Policy applies only in respect of our online services.

9 Data breach

9.1 If a data breach or suspected data breach occurs, we will undertake a prompt investigation, which will include an assessment of whether the incident is likely to result in serious harm to any individuals. In such a situation we will comply with the requirements of the Act which may require notification to the Office of the Australian Information Commissioner (**OAIC**) and affected individuals. Please contact us if you have reason to believe or suspect that a data breach may have occurred, so that we can investigate and, if necessary, undertake appropriate containment, risk mitigation and notification activities as required.

10 Complaints

10.1 If you have a complaint about the way in which we handle your personal information, or you believe that a breach of your privacy has occurred, please contact us.

10.2 Your complaint will be considered and dealt with by our nominated representative, who may escalate the complaint internally within our organisation if the matter is serious or if necessary to resolve it.

10.3 Please allow us a reasonable time to respond to your complaint. If you are not satisfied with our resolution, you may make a complaint to the OAIC whose contact details can be found at: <http://www.oaic.gov.au/>.

11 Changes to our Privacy Policy

11.1 We reserve the right to amend this Privacy Policy at any time. We publish our current Privacy Policy on our websites, and you may obtain a copy of our Privacy Policy from our websites or by contacting us.