

URBAN TILE COMPANY CUSTOMER PRIVACY POLICY

1. POLICY STATEMENT

- 1.1 Urban Tile Company Pty Ltd (the Company) is committed to maintaining the security of customers' personal information obtained through its operations by complying with the relevant legislation.
- 1.2 The Company takes its obligations to protect this information very seriously. All Workers must ensure that customers' private information is collected and stored in a safe, secure and confidential manner. This will be achieved by ensuring the integrity of the manner in which information is collected and stored.
- 1.3 Failure to comply with this policy may result in disciplinary action. The action taken will depend on the circumstances but may involve a warning, counselling, demotion or dismissal.

2. SCOPE

- 2.1 The Company is bound by the Privacy Act 1988 (Cth) (the Act). The Act governs the collection, use and storage of personal and/or sensitive information, including written and verbal information.
- 2.2 The Australia Privacy Principles (APP) set out the obligations that businesses must comply with and these are incorporated into the following guidelines to ensure compliance with the appropriate legislation.
- 2.3 This policy applies to the Company and its Workers and is to be read in conjunction with all other relevant policies of the Company, particularly those regarding confidentiality.

3. DEFINITIONS

3.1 In this Policy:

Company means Urban Tile Company Pty Ltd.

Disclosure means the use or disclosure of personal information to others outside of the business. It does not include giving individuals information about themselves.

Manager means an employee's direct supervisor or manager.

Personal information means information or an opinion about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. It includes information or an opinion forming part of a database. The information may or may not be true.

Policy means the Urban Tile Company Customer Privacy Policy.

Worker means an employee, contractor, sub-contractor, on-hired employees, trainee, apprentice or volunteer.

4. GUIDELINES

- 4.1 The Company will ensure access to its customers' private information is limited only to those people necessary, who require the information in order to perform their duties.
- 4.2 The Company will use or disclose personal information only for the primary purpose for which the information was collected, unless:
 - (a) the individual has consented to the use or disclosure of personal information for another purpose;
 - (b) the use or disclosure is related to the primary purpose;
 - (c) the use or disclosure of the information is required or authorised by or under an Australian law;
 - (d) the Company reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by or on behalf of an enforcement body; or
 - (e) as otherwise permitted by the Privacy Act 1988 (Cth).
- 4.3 The Company will comply with the following guidelines in relation to the collection, storage, use and disclosure of private information.

When do we collect personal information?

- 4.4 The Company generally collects personal information in the normal course of providing goods and services for its customers.

4.5 Other activities and functions of the business that may require the Company to collect personal and/or sensitive information include:

- (a) handling customer complaints,
- (b) managing maintenance or delivery requests,
- (c) processing finance arrangements, and
- (d) receiving instructions from an individual.

How do we collect personal information?

4.6 The Company generally collects personal information directly from its customers but may also collect personal information from a referral.

4.7 Personal information is generally collected from completed forms but may also be collected from the Company's website, email correspondence, letters or other forms of communication with the customer.

What personal information may we collect?

4.8 The Company may collect the following types of personal information from customers:

- their salutation, full name and contact details including their residential or business address, email address and telephone number,
- their gender, age, date of birth and occupation,
- their company name (if applicable),
- their signature,
- proof of identity, such as their driver's licence or passport number,
- their bank account, finance or other payment details, and
- a photograph or video surveillance recording of customers' physically present on the Company's premises, and
- other information they may supply to the Company.

4.9 The Company may also collect information from customers' that is not personal information because it does not identify them personally. This information is normally retained with the customers' personal information and may include:

- (a) information required to deliver, service or fulfil warranty and repair obligations (if applicable) for any products and/or services provided;
- (b) the customer's marketing preferences, including the type of marketing materials they wish to receive and method of delivery (e.g. email, SMS, direct mail, or other);
- (c) information provided the Company via application forms, or directly to Workers in relation to products and services;
- (d) information provided to the Company via other forms online (such as competition entries, surveys or enquiry forms).

What is the primary purpose of collecting personal information?

- 4.10 The Company may use or disclose personal information for:
 - (a) the purposes for which it was collected and disclosed, including related or incidental purposes which would be reasonably expected by the customer,
 - (b) other purposes to which the customer has consented, and/or
 - (c) as otherwise authorised or required by law.

4.11 Some of the primary purposes for which the Company commonly collects, uses and discloses personal information are:

- (a) to offer, sell and deliver products and/or services to customers whether directly or with the assistance of external service providers,
- (b) to market the Company's products and/or service, including through consultations, special promotions and campaigns in place from time to time,
- (c) to answer queries and provide tailored advice or information,
- (d) to carry out activities relevant to fraud and loss prevention, customer analysis, sales analysis, quality control, repairs and market research,
- (e) to carry out a full and proper investigation into any complaints brought against the Company, and
- (f) to comply with any relevant laws and/or regulations, or to comply with any directions given by regulators or authorities.

What if I refuse to provide personal information?

URBAN TILE COMPANY CUSTOMER PRIVACY POLICY

- 4.12 If the Company is unable to collect, use or disclose personal information as stipulated in this Policy, some or all of the following may occur:
- (a) the Company may be unable to offer its products and/or services to you, to the requested standard or at all,
 - (b) the Company may be unable to provide further information about its products and/or services that the customer has purchased or intends to purchase in the future,
 - (c) the Company may be unable to tailor the content of its direct marketing communications to suit the customer's preferences, and/or
 - (d) the customer may experience a delay in service.

How do we hold and secure personal information?

- 4.13 The Company may hold personal information in either electronic or hard copy form.
- 4.14 If the customer provides information electronically, the Company will retain this information in its computer systems and databases. This includes computer software programs, internet servers and hosted internet solutions provided by third parties.
- 4.15 The Company has appropriate procedures in place to safeguard and secure the information it collects to prevent unauthorised access or disclosure, maintain data accuracy and ensure the appropriate use of information.
- 4.16 These security measures include password protection for accessing IT systems, physical access restrictions.
- 4.17 When personal information is no longer required, the Company will take reasonable steps to destroy or de-identify any personal information it holds in a secure manner.

When do we disclose personal information?

- 4.18 The Company may disclose a customer's personal information to any of the following:
- its Workers or service providers, to the extent reasonably necessary to fulfil its obligations to the customer. This may include internet service providers, IT systems administrators, mailing houses, couriers, payment processors, and data entry service providers;
 - any related bodies corporate;
 - its business advisors, including lawyers, accountants or other professional service providers, to the extent reasonably necessary;
 - its suppliers and distributors to the extent reasonably necessary in connection with its obligations to the customer;
 - if required by law, to any person authorised by such law (such as the police service, ambulance service, or government departments or regulators within Australia in connection with law enforcement activities).
- 4.19 Where applicable information is shared with a third party, these third parties are obliged to observe the confidential nature of such information and are prohibited from using any or all of this information other than for the purpose for which it was provided. The Company will also seek assurance from third parties that personal information within their possession is managed and destroyed appropriately, in compliance with Australian privacy law. The Company will endeavour to reflect this discussion in writing and seek mutual agreement from the third party.
- 4.20 The Company will generally only disclose a customer's personal information to an overseas associated entity if the customer agrees, or if the Company is authorised or required by law.
- 4.21 A customer's personal information will not be shared or disclosed other than as described in this Policy.

Direct Marketing Communications

- 4.22 If a customer has consented, the Company may use all or part of their personal information to send them direct marketing communications and information via email, SMS, or registered post.

- 4.23 Within all marketing communications, the Company will provide a simple means for individuals to "opt out" and unsubscribe from the Company's mailing list. Alternatively, recipients may opt out of receiving marketing communications at any time by contacting the Company via the details provided below.

- 4.24 If a customer has indicated a preference for a method of communication, the Company will endeavor to communicate via that method.

- 4.25 The Company does not provide its customers' personal information to any other organisations for the purposes of direct marketing.

How can you access your personal information, seek correction or make a complaint?

- 4.26 Customers may access or ask the Company to correct their personal information by making a request via the contact details below. In these circumstances, the Company may ask a customer to verify their identity to ensure that personal information is not improperly accessed.

- 4.27 Customers may also make a complaint about how the Company has handled its personal information via the contact details below.

Email: admin@urbantilecompany.com.au

Phone: 0733902544

Mail: Manager, 37 Smith Street, Capalaba, Qld 4157

- 4.28 The Company will respond to an individual's written and signed request or complaint as soon as practicable.

- 4.290 The Company may refuse access to personal information where:

- (a) providing access would pose a serious and imminent threat to the life or health of any staff member,
- (b) providing access would have an unreasonable impact upon the privacy of other staff members,
- (c) the request for access is frivolous or vexatious,
- (d) providing access would reveal the intentions of the Company in relation to negotiations with a staff member in such a way as to prejudice those negotiations,
- (e) providing access would be likely to prejudice an investigation of possible unlawful activity,
- (f) denying access is required or authorised by law or court order, or
- (g) providing access would be likely to prejudice the outcome of an internal investigation.

- 4.30 Ordinarily, the Company will provide customers with a record of their personal information via their preferred contact method (phone, email or mail) and will not charge a fee.

- 4.31 If such request is unlawful or may interfere with the privacy of others, the Company may reasonably refuse to provide access to personal information.

5. COMPLIANCE

- 5.1 Consistent with the terms of employment, Workers who fail to comply with this Policy may face disciplinary action up to and including termination.

ACKNOWLEDGEMENT

I, _____, have read and understood the Urban Tile Company Customer Privacy Policy. I also understand that any breaches of this policy may result in disciplinary action being taken, up to and including dismissal.

Signature _____

Date _____