

## 1) THE PURPOSE OF THIS POLICY

Harrison Manufacturing Company Pty Limited (the Company) ABN 50 000 080 946 is bound by the Privacy Act and the Australian Privacy Principles (APPs) which regulate the collection, use and disclosure of *personal information*.

This Privacy Policy explains:

- the scope of our Privacy Policy;
- why the Company collects *personal information*;
- what *personal information* the Company collects;
- how the Company collects and use your *personal information*;
- how the Company discloses your *personal information*, including to overseas recipients;
- your right to access your *personal information*;
- your right to correct your *personal information*;
- how the Company protects the integrity of your *personal information*;
- your right to make a privacy complaint; and
- how you can contact us regarding privacy concerns.

The Company reserves the right to review, and if necessary, change this Privacy Policy.

## 2) SCOPE

This Privacy Policy governs all *personal information* collected by and provided to us and must be adhered to by all persons who access, use, process, control or otherwise deal with *personal information* on our behalf.

This policy applies to independent contractors and job applicants, as well as individuals who provide us with their *personal information*.

This Privacy Policy does not apply to our acts and practices which relate directly to the employee records of our current and former employees.

## 3) WHY THE COMPANY COLLECTS PERSONAL INFORMATION

The Company collects *personal information* from you for the following purposes (**Primary Purpose**):

- to lawfully carry out our functions and activities;
- to deliver the products and services that you requested;
- to provide you with further information about the products and services you requested;
- to personalise and customise your experiences with us;
- to help us review, manage and enhance our services;
- to develop insights used in reports or other content developed by us;

- to communicate with you;
- for administration purposes, including charging, billing and collecting debts;
- to promote and market those of our other products and services which the Company consider may be of interest to you;
- when considering making offers to job applicants and prospective employees or for employment purposes; and
- to receive services from you or the organisation which employs you.

In addition to the Primary Purpose, the Company may use the *personal information* the Company collects and you consent to us using your *personal information* to:

- verify your identity;
- investigate any complaints about, or made by you, or if the Company have reason to suspect you have breached any relevant terms and conditions; and
- as required or permitted by any law.

Unless otherwise provided by law, the Company will not collect, hold, use or disclose sensitive information without your consent.

#### **4) WHAT PERSONAL INFORMATION DOES THE COMPANY COLLECT?**

The nature and extent of *personal information* the Company collect varies depending on your particular interaction with us.

*Personal information* that the Company commonly collects from you would include (but is not limited to):

- your name, position,;
- your address, email address, telephone numbers,;
- business references, details about your business, Australian Business Number;
- nature of products or services being sought for the purposes of filling your order;
- insurance details;
- your occupation, career history and references.

The Company also collects information that is not *personal information*, such as data relating to your activity on our Company website.

If you feel that the *personal information* that the Company are requesting at any point is not information that you wish to provide, please feel free to raise this with us.



### 5) HOW DOES THE COMPANY COLLECT *PERSONAL INFORMATION*?

Generally, *personal information* is collected by us from a variety of sources, including when dealing with customers, when dealing with individuals, undertaking marketing initiatives, or when recruiting.

For example, the Company may collect *personal information* from you in the following circumstances:

- when you are fulfilling your registrations to events, webinars, participating in surveys or purchasing products or services;
- when you deal with us as an independent contractor; or
- when you apply for a job.

*Personal information* may be provided by you using our Website or by telephone, business cards, contracts, applications, competition entries, survey entries, mail or email, registration forms, face-to-face or in writing, whether verbally, in hardcopy or electronic format.

Where possible, the Company collects your *personal information* directly from you. In some circumstances the Company may obtain *personal information* from a third party.

If you provide *personal information* about another person to us, the Company requires that you:

- inform that person you have done so and provide them with a copy of this policy; and
- confirm to us that you have that person's consent to provide such information for the purpose specified.

If the Company receives unsolicited *personal information* about you that the Company could not have collected in accordance with this Privacy Policy and the Privacy Act, the Company will within a reasonable period, destroy or de-identify such information received.

### 6) WEBSITE AND GOOGLE ANALYTICS

Information the Company collects may include:

- the Internet Protocol address and a component of the domain name used.
- the type of browser and operating system you used;
- the date and time you visited our Website;
- the web pages or services you accessed at our Website;
- the time spent on individual pages and our Website overall;
- which files you downloaded; and
- information about your computer and Internet connections using cookies.

The Company may use:

- Google Analytics Demographics and Interest Reports to obtain a more detailed understanding of our Website users and their potential needs. The Company does not collect *personal information* by such methods; only aggregate data is used for planning purposes.

- "cookie" technology, where our servers deposit special codes on a visitor's computer. This information helps us determine in the aggregate the total number of visitors to the site on an ongoing basis and the types of Internet browsers (e.g., Chrome or Internet Explorer) and operating systems (e.g. Windows or MacIntosh) used by our visitors. This information is used to enhance website usability.

### 7) HOW DOES THE COMPANY USE YOUR PERSONAL INFORMATION?

The Company will only use and disclose your *personal information*:

- for purposes which are related to the Primary Purpose; or
- if the Company otherwise get your consent to do so,
- in accordance with this Privacy Policy and the Privacy Act

The Company will not use your *personal information* for any purpose for which you would not reasonably expect us to use your *personal information*. Additionally, the Company will not disclose your sensitive information without your consent, unless there is a need to disclose such information in accordance with the Privacy Act or to comply with any other regulatory requirement.

The Company will only use or disclose your *personal information* for the purposes of direct marketing if:

- the Company collected the information from you;
- it is reasonable in the circumstances to expect that the Company would use or disclose the information for direct marketing purposes;
- the Company provide you with a simple means to 'opt-out' of direct marketing communications from us; and
- you have not elected to 'opt-out' from receiving such direct marketing communications from us.

You may opt out of receiving such communications by:

- clicking a link on the email communications sent to you;
- contacting our Privacy Contact Officer by email or phone using the details below;
- writing to us at our address below.

### 8) WHAT HAPPENS IF YOU CHOOSE NOT TO PROVIDE YOUR PERSONAL INFORMATION?

You are not obliged to give us your *personal information*. If you would like to access any of our services on an anonymous basis or using a pseudonym, the Company will take reasonable steps to comply with your request. However, the Company will require you to identify yourself if:

- the Company are required by law to deal with individuals who have identified themselves; or
- it is impracticable for us to deal with you if you do not identify yourself or elect to use a pseudonym.

Please also be aware that your request to be anonymous or to use a pseudonym may affect our ability to provide you with the requested goods and/or services and the range of options available to you or the organisation as a member may be limited.

For example, the Company may not be able to provide the full range of services or allow you or your organisation to participate in networking functions, seminars and events, or successfully deliver any products and services that you have purchased if you do not provide your *personal information*.

### **9) WHEN DOES THE COMPANY DISCLOSE YOUR PERSONAL INFORMATION?**

For the purposes referred to above in this Privacy Policy, you acknowledge and agree that the Company may disclose *personal information* and you consent to us disclosing such *personal information* to:

- third parties engaged by us to perform functions or provide products or services on our or their behalf such as mail outs, marketing or advertising;
- third parties that sponsor or promote us;

These external service providers are under a duty to us to maintain the privacy of your information and we only disclose your personal information to them to the extent necessary for them to perform the services we have requested.

### **10) DOES THE COMPANY SEND INFORMATION OVERSEAS**

The Company may in some circumstances as necessary send *personal information* to overseas recipients (including recipients which may or may not be affiliated with us).

If the Company sends *personal information* to overseas recipients, the Company will take reasonable measures to protect your *personal information* such as ensuring all information is de-identified where appropriate before being transmitted. However, you acknowledge and agree that if the Company discloses *personal information* to overseas recipients, the Company is obliged to take reasonable steps to ensure overseas recipients of your *personal information* comply with the Privacy Act and the APPs.

### **11) ACCESS TO YOUR PERSONAL INFORMATION**

If you require access to your *personal information*, please contact the Privacy Contact Officer. You are required to put your request in writing and provide proof of your identity.

The Company is not obliged to allow access to your *personal information* if:

- the Company reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- giving access would have an unreasonable impact on the privacy of other individuals;



- the request for access is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings between you and us and would not ordinarily be accessible by the discovery process in such proceedings;
- giving access would reveal our intentions in relation to negotiations with you in a way that would prejudice those negotiations;
- giving access would be unlawful;
- denying access is required or authorised by or under an Australian law or a court/tribunal order;
- the Company has reason to suspect that unlawful activity, or misconduct of a serious nature relating to our functions or activities has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
- giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- giving access would reveal internal evaluative information in connection with a commercially sensitive decision-making process.

If you make a request for access to *personal information*, the Company will:

- respond to your request within a reasonable period; and
- if reasonable and practicable, give access to the information in the manner requested

If the Company refuses a request to correct *personal information*, the Company will:

- give you a written notice setting out the reasons for the refusal and how you may make a complaint; and
- take reasonable steps to include a statement with your *personal information* the Company refuse to correct.

Nothing in this Privacy Policy replaces other informal or legal procedures by which you can correct *personal information*.

### **12) CORRECTION OF YOUR PERSONAL INFORMATION**

The Company requests that you keep your *personal information* as current as possible. If you feel that information about you is not accurate or your details have or are about to change, you can:

- call us on +61 2 8978 1000 and the Company will correct or update your *personal information*; or

If you make a request to correct your *personal information*, the Company will:

- respond to your request within a reasonable period; and
- if reasonable and practicable, correct the information in the manner requested.

If the Company refuses a request to correct *personal information*, the Company will:

- give you a written notice setting out the reasons for the refusal and how you may make a complaint; and
- take reasonable steps to include a statement with your *personal information* the Company refuse to correct.

Nothing in this Privacy Policy replaces other informal or legal procedures by which you can correct *personal information*.

### 13) INTEGRITY OF YOUR PERSONAL INFORMATION

The Company will take reasonable steps to:

- ensure that the *personal information* that the Company collect is accurate, up to date and complete;
- ensure that the *personal information* that the Company hold, use or disclose is, with regard to the relevant purpose, accurate, up to date, complete and relevant; and
- secure your *personal information* while it is being held by us.

The Company will take reasonable steps to protect *personal information* from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure

Electronic information is protected by various security measures (including encryption and password protection) and physical paper files are stored in a secure location. *Personal information* is de-identified where appropriate. Data protection includes the use of password access areas and secure servers.

You acknowledge that the security of communications sent by electronic means or by post cannot be guaranteed. The Company cannot accept responsibility for misuse, loss or unauthorised access to your *personal information* where the security of information is not within our control. If you suspect any misuse or loss of your *personal information* please contact us immediately.

The Company will take reasonable steps to destroy or de-identify any *personal information* held by us if the Company no longer needed to hold the information for the purpose it was collected and the Company is not otherwise required by law to retain the information.

### 14) COMPLAINTS

If you have a complaint about how the Company collect, use, disclose, manage or protect your *personal information*, or otherwise consider there may be a breach of the Privacy Act or the APPs, please contact us in writing.

The Company treats all complaints seriously and intend to resolve your complaint within a reasonable timeframe, usually 14 days or otherwise as soon as practicable. However, in some complex cases, resolution may take longer.

Once the complaint has been received, the Company will try to resolve the matter in a number of ways:

- **Request for further information:** The Company may request further information from you. You should be prepared to provide us with as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and determine an appropriate solution. All details provided will be kept confidential.
- **Discuss options:** The Company will discuss options for resolution with you and if you have suggestions about how the matter might be resolved you should raise these with our Privacy Contact Officer.
- **Investigation:** Where necessary, the complaint will be investigated. The Company will try to do so within a reasonable time frame. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.
- **Conduct of our employees:** If your complaint involves the conduct of our employees the Company will raise the matter with the employees concerned and seek their comment and input in the resolution of the complaint.

You are free to lodge a complaint directly with the Office of the Australian Information Commissioner (OAIC) online, by mail, fax or email. For more information please visit the OAIC website at <http://www.oaic.gov.au/privacy/privacy-complaints>.

## CONTACT

Please forward all correspondence in respect of this Privacy Policy to the Privacy Officer, who can be contacted by mail, telephone or email as follows:

**Privacy Officer**  
**Harrison Manufacturing**  
**PO Box 7002**  
**Warringah Mall NSW 2100-**

**Phone: +61 2 8978 1000**

**Email: [privacy.officer@harrison.com.au](mailto:privacy.officer@harrison.com.au)**

## INTERPRETATION AND DEFINITIONS

Except where the context otherwise provides or requires:

- the terms **the Company, us** or **our** refers to Harrison Manufacturing Company Pty Limited; and
- the terms **you** or **your** refers to any person who provides us with *personal information*.

In this Privacy Policy unless otherwise provided, the following terms shall have their meaning as specified:

- **Privacy Act** means the *Privacy Act 1988* (Cth) as amended.
- **APP means Australian Privacy Principles**
- **Privacy Policy** means this privacy policy as amended.
- **Website** means the HMC website at: <http://www.harrisonmanufacturing.com.au/>
- Terms italicised and defined in the Privacy Act have the meaning given to them in the Privacy Act.