

**PRIVACY POLICY**  
**CBS TRADES PTY LTD**

**1 INTRODUCTION**

**1.1 About this policy**

This Privacy Policy (“**this Policy**”) is the official privacy policy of **CBS TRADES PTY LTD ACN 693 097 353 (ABN XX)** domiciled in Australia and having registered office at Level 22, 307 Queen Street, Brisbane, QLD 4000, and any of its wholly owned subsidiaries and business divisions (hereafter collectively referred to as “**CBS**” or “**we**”, “**us**”, or “**our**”) and it applies to all Personal Information about individuals collected by CBS. If this Policy has been referenced on a website pertaining by a company or business entity, that company or business entity is a part of CBS and this Policy applies to all information collected and used by that entity.

**1.2 Relationship with Privacy Act and other Laws**

- (a) This Policy is intended to comply with the *Privacy Act 1988* (Cth) (the “**Act**”) to ensure CBS’ compliance with its obligations under the Act, including the Australian Privacy Principles (the “**APPs**”), if applicable to CBS. This Policy is not otherwise an ‘opt-in’ under section 6EA of the Act.
- (b) For the purpose of interpretation of this Policy any terms in this Policy defined in the Act have the same meaning as defined in the Act.
- (c) To the extent that CBS may from time to time be the subject of privacy laws of nations other than Australia, this Policy extends to information collected by us from overseas entities but does not limit our obligations under any other laws.

**1.3 What this Policy provides**

- (a) In this Policy we explain how and why we collect personal information as defined in the Act (“**Personal Information**”) about individuals, how we use such information within our business, and what controls individuals have over our collection and use of information about them.
- (b) This Policy is relevant to individuals who are current and former customers, as well as other individuals that we deal with in connection with the goods and services we provide or information we collect from customers and other persons.

**1.4 Our commitment**

We value your privacy and are committed to complying with laws that deal with how businesses may collect, hold and use Personal Information about individuals, and to protecting and safeguarding the privacy of individuals when they deal with us, including the Act and the APPs if applicable.

**2 COLLECTION OF INFORMATION**

**2.1 Type of information collected**

- (a) Some information provided to us by clients, customers and other parties might be considered private or personal. However, without such information we would not be able to carry on our business activities and provide our services. We will only collect such Personal Information if it is necessary for one of our functions or activities.

- (b) The kinds of Personal Information that we may collect and hold in respect of individuals may include:
  - (i) names;
  - (ii) contact details;
  - (iii) identification information;
  - (iv) financial information, including information about transactions and trading history with us; and
  - (v) information about accounts and transactions with CBS suppliers.

## **2.2 Situations where information is collected**

Personal information may be collected in the following situations by CBS:

- (a) if an individual contacts us, we may keep a record of that communication or correspondence;
- (b) if an individual submits an application or curriculum vitae or another form required to be completed by an individual to enable and/or facilitate services and/or employment to be provided by us;
- (c) when applying for and/or establishing and/or accessing an account with us or a CBS supplier or ordering services from us;
- (d) when conducting certain types of transactions such as cheque or credit card purchases or refunds;
- (e) when an individual submits their contact details to be included on our mailing lists;
- (f) when an order is placed with us to purchase goods or services we may require individuals to provide us with contact information including name, address, telephone number or email address and financial information (such as credit card details) for the purposes of processing and fulfilling such an order or providing the service;
- (g) when CCTV footage is recorded at any of our premises; and
- (h) when audio or video calls are recorded including for training purposes.

## **2.3 Manner of collection**

- (a) At or before the time the Personal Information about an individual is collected by us, we will take reasonable steps to ensure that the individual is made aware of who we are, the fact that the individual is able to gain access to the information held about the individual, the purpose of the collection, the type(s) of organisations to which we may usually disclose the information collected about the individual, any laws requiring the collection of the information and the main consequences if all or part of the information is not collected.
- (b) We usually collect Personal Information about individuals directly from the individual. However, sometimes we may need to collect Personal Information about individuals from third parties for the purposes described below in this Policy. The circumstances in which we may need to do this include, for example, where we need information from a third party to assist us to process an application or an order (such as to verify information an individual has provided or to assess the individual's circumstances) or to assist us to locate or communicate with the individual.

## **2.4 How information may be held**

- (a) CBS may hold Personal Information about an individual in physical form or in electronic form on our systems or the systems of our IT service providers.
- (b) The Personal Information that we hold about individuals is protected by physical, electronic, and procedural safeguards and we also require our service providers that hold and process such information on our behalf to follow appropriate standards of security and confidentiality. Any Personal Information we collect from an individual or about an individual is kept securely and held on secure servers in controlled facilities.
- (c) CBS takes other technical and organisational measures to protect the Personal Information of individuals from misuse, loss or disclosure. These include:
  - (i) training of staff and others who work for CBS on how to handle Personal Information appropriately; and
  - (ii) restricting of access to what is necessary for specific job functions;
  - (iii) regularly updating its software and hardware including passwords and permissions; and
  - (iv) employing the use of firewall and cyber security technology to avoid unauthorised access to our systems and data.

## **2.5 Period of retention of information**

- (a) CBS may retain Personal Information collected or provided to us including:
  - (i) telephone recordings of calls to our hotlines and contact numbers;
  - (ii) CCTV security footage from our business premises; and
  - (iii) client files including individuals' Personal Information, contact information, financial and transactional information;

to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes.
- (b) CBS will retain Personal Information collected for such minimum or maximum periods as it is required by law depending on the type of information collected. But for any minimum or maximum periods of retention required by law, we will safely destroy Personal Information once it is no longer required.

## **3 USE AND DISCLOSURE OF PERSONAL INFORMATION**

### **3.1 Purposes of collection**

- (a) CBS may, as permitted by law, use or disclose Personal Information held about an individual as permitted by law and for the business purposes for which it is collected (e.g. provision of our services, including administration of our services, notifications about changes to our services, record-keeping following termination of our services and technical maintenance), that is, to carry on our business activities and provide services to our customers.
- (b) We may also use such information about individuals for a purpose related to the primary purpose of collection and where the individual would reasonably expect that we would use the information in such a way. This information is only disclosed to persons outside our business in the

circumstances set out in this Policy or as otherwise notified at the time of collection of the information.

- (c) CBS' business purposes for which Personal Information is collected, used and disclosed may include:
- (i) processing an application or service request (including verifying a person's identity for these purposes);
  - (ii) managing our services or other relationships and arrangements, including processing CBS supplier account applications, receipts, payments and invoices;
  - (iii) assessing and monitoring credit worthiness;
  - (iv) detecting and preventing fraud and other risks to us and our customers;
  - (v) responding to inquiries about applications, accounts or other services or arrangements;
  - (vi) understanding our customers' needs and developing and offering services to meet those needs;
  - (vii) researching and developing our services and maintaining and developing our systems and infrastructure (including undertaking testing);
  - (viii) ensuring workplace health and safety and productivity of employees at our workplace premises;
  - (ix) dealing with complaints;
  - (x) meeting legal and regulatory requirements, for example various Australian laws may expressly require us to collect/and or disclose Personal Information about individuals, or we may need to do so in order to be able to comply with other obligations under those laws; and
  - (xi) enforcing our rights, including undertaking debt collection activities and legal proceedings.

### **3.2 Additional disclosure situations**

In addition to the above, we are permitted to use or disclose Personal Information held about individuals:

- (a) where the individual has consented to the use or disclosure;
- (b) where we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious, immediate threat to someone's health or safety or the public's health or safety;
- (c) where we reasonably suspect that unlawful activity has been, is being, or may be engaged in, and the use or disclosure is a necessary part of our investigation or in reporting the matter to the relevant authorities;
- (d) where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process);
- (e) where we reasonably believe that the use or disclosure is necessary for prevention, investigation, prosecution and punishment of crimes or wrongdoings, or the preparation for, and conduct of, proceedings before any court or tribunal or the implementation of the orders of a court or tribunal by or on behalf of an enforcement body; and

- (f) where a customer (being the individual or related to the individual) has requested a service to be provided by us and we are required to disclose the information to a third party in order to facilitate the provision of the service. In most, if not all cases, any such disclosure will be with the consent of the individual.

### **3.3 Third parties to whom information may be disclosed**

Third parties to whom we may disclose Personal Information about individuals in accordance with our business purposes set out above may include:

- (a) our legal advisors;
- (b) our financial and accounting advisors;
- (c) our IT service providers;
- (d) regulatory bodies in Australia;
- (e) participants in financial and payment systems, such as banks, credit providers, and credit card associations;
- (f) guarantors and security providers associated with individuals;
- (g) debt collectors;
- (h) cloud information storage providers; and
- (i) CBS suppliers and other trade suppliers.

### **3.4 Use of Personal Information by third parties**

CBS, subject to having complied with its obligations under this Policy, makes no warranty in relation to, and will not be liable for, any misuse or loss of Personal Information by third parties to whom we are authorised to provide Personal Information under this Policy.

## **4 USE OF AUTOMATED DECISION MAKING TOOLS (ADM)**

### **4.1 We do not use ADM**

CBS does not presently use computer programs to make decisions using Personal Information of individuals that could reasonably be expected to significantly affect the rights or interests of individuals.

## **5 DIRECT MARKETING**

### **5.1 We may carry out direct marketing**

As part of CBS' functions and business activities and to promote the services we can provide to our customers, we may be permitted to use Personal Information about individuals that individuals have provided to us for the purposes of direct marketing. Direct marketing includes, but is not limited to, sending information to and/or contacting individuals in relation to promotions relating to us.

### **5.2 Opting out of direct marketing**

- (a) All recipients, including individuals, can opt out of receiving direct marketing communications by sending an email to our Privacy Officer, at the email address shown in the 'Contacting us' section of this Policy.
- (b) In any direct marketing communication we remind recipients of their right to opt out of receiving direct marketing communications.

### **5.3 Third party marketing**

CBS does not engage in the practice of selling client information for marketing purposes, but does not warrant that third parties who receive Personal Information of its clients will not undertake marketing activities with that information. If you experience harassment or spamming from a third party that we have engaged with,

please let us know, and we will endeavour to take such action as is reasonably possible for us to take.

## 6 ANONYMITY AND PSEUDONYMITY

Individuals would generally have the option of dealing with us anonymously. However, this only applies where it is not impracticable for us to deal with individuals acting anonymously or under a pseudonym. For example, individuals making general enquiries of CBS may do so anonymously or under a pseudonym. However, if the dealing with us is for us to supply goods and services and/or to enter into contractual relations (such as a commercial credit account) with a customer that is the individual or is associated with the individual, then it is impractical for such individuals to deal with us on an anonymous basis or under a pseudonym.

## 7 WEBSITE AND LINKS

### 7.1 Our websites

CBS advertises and carries on business through a number of websites pertaining to our business, including:

[WEBSITE TBA]

and any other website that contains a link to this Policy.

### 7.2 Website terms and conditions

- (a) Each of our websites collects Personal Information pursuant to this Policy except as otherwise stated on the website.
- (b) A website may display additional terms and conditions for access and use of the website which apply in addition to this Policy.

### 7.3 Cookies

- (a) CBS collects information from its websites and software applications using IP files or “cookies”.
- (b) Cookies are small text files sent by us to your computer or mobile device, which enable features, functionalities and allow the websites or applications, among other things, store and retrieve information about the number of visits, browsing habits of the user or your device and, depending on the information they contain and the way you use your device, can be used to recognize the user.
- (c) Some cookies are associated with your account and personal data to remember that you are logged in and which workspaces you are logged into. Other cookies are not tied to your account but are unique and allow us to carry out analytics and customization, among other similar things.
- (d) CBS will generally use cookies for the following purposes:
  - (i) Authentication of your account or browser for safer or faster access or retrieval of your personal information and preferences;
  - (ii) Security and functionalities including support security features and detect malicious activity;
  - (iii) Personalisation, preferences, features and services including denoting the language that your prefer, help complete forms more easily and provide customised content; and
  - (iv) Marketing performance, analytics, and market research to helps us understand and improve our services and customise them to our customers.

- (e) CBS may also use social cookies and pixels to enable you to share our content with your friends and networks and to create links between your visit to our website and a third party which may subsequently be used for analytical and advertising purposes.
- (f) Not all cookies will come from our websites and can come from external sources, including by partners services such as Google, Meta etc. to follow your activity across our and various other websites and applications.
- (g) Cookies may remain active for various durations ranging from:
  - (i) session cookies - active during the session only and expire when you close your browser; and
  - (ii) persistent cookies – cookies that remain on your hard drive until you erase your hard drive or your browser does, depending on the cookie’s expiration date.
- (h) We will typically ensure our cookies have an expiry date of 12 months and not longer, but please be aware that we may need to retain data from certain cookies for any possible legal claims up to the claim limitation period. Furthermore, when a cookie has expired, we may renew it if you agree to its use once more.
- (i) Depending on your consent to the use of certain cookies, the data gathered via cookies may be shared with selected partners and service providers who assist us with various functions, such as website analytics, advertising, and improving user experience. Refer to clause 9 of this Policy concerning transfer of data overseas.
- (j) You can stop your browser receiving or accepting cookies at any time, this is typically done by either:
  - (i) Managing cookie preferences – via the cookie banner or through the settings panel of our website or your browser; or
  - (ii) Disabling cookies – via your browser. Please refer to your specific browser’s instructions.

However, please note that the use of cookies is in some cases necessary for certain functions on our websites to work properly, and therefore we cannot assure you that you will be able to access and enjoy all functions of our website without the use of cookies.

#### **7.4 Third party links**

Our websites may contain links to other websites and those third party websites may collect Personal Information about individuals. We are not responsible for the privacy practices of other businesses or the content of websites that are linked to our websites. We encourage users to be aware when they leave our website and to read the privacy statements of each and every website they frequent.

## **8 SECURITY AND STORAGE OF INFORMATION**

### **8.1 Our commitment**

CBS places a great importance on the security of all information associated with our clients and others who deal with us. We have security measures in place to reasonably protect against the loss, misuse, unauthorised access and alteration of Personal Information and other data under our control.

### **8.2 Security and storage methods**

- (a) All Personal Information and other data held is kept securely and that which is held electronically is held on secure servers in controlled facilities.

- (b) Information stored within our computer systems or by our agents who provide electronic storage facilities can only be accessed by those entrusted with authority and computer network password sanctions.
- (c) We consult with IT service providers to implement reasonable levels of firewall, malware detection and data security procedures.

### **8.3 Electronic transmissions**

No data transmission over the internet can be guaranteed to be absolutely secure. As a result, whilst we strive to protect users' Personal Information, we cannot ensure or warrant the security of any information transmitted to or from the online services, and users do so at their own risk. Once we receive a transmission, we make every effort to ensure the security of such transmission on our systems.

### **8.4 Banking information and payment requests**

- (a) We will never email you or telephone you requesting your credit card or bank account details except in connection with a purchase that you are making by email or telephone.
- (b) In all cases, if you receive a communication purported to be from us requesting payment or banking information, we recommend that you separately contact us via our publicly available telephone contact details to verify the authenticity of the request.

### **8.5 Data breach**

CBS has developed a data breach response plan which ensures compliance with the mandatory notification requirements of Part IIIC of the Act.

## **9 TRANSFER OF INFORMATION OVERSEAS**

### **9.1 Use of cloud services**

CBS may utilise local and overseas cloud services for the purpose of storing information. Your Credit Information may be disclosed to our cloud service provider for that purpose. While our cloud service providers are located in Australia and New Zealand, the country location of our cloud service providers may periodically change.

### **9.2 Data transfer to overseas recipients**

- (a) Some of the third parties to whom we may disclose your Personal Information as outlined in section 3.3 of this Policy may be located overseas. In addition, we may co-operate with overseas entities in the delivery of goods and services for our clients.
- (b) Some of the international entities to whom Personal Information may be disclosed include:
  - Our New Zealand parent company, Combined Building Supplies Co-Operative Limited (New Zealand Company Number 6371972);
- (c) Subject to paragraph (d) below, we take reasonable steps to ensure that overseas recipients of your Personal Information do not breach the Australian Privacy Principles. This is usually done by CBS requiring that our overseas recipients comply with the Act and this Policy.
- (d) In some cases, we will disclose Personal Information to overseas recipients that we reasonably believe, or which are determined by Government declaration, to be situated in a country or subject to a binding scheme ("**Whitelisted Countries and Schemes**"):

- (i) having the effect of protecting Personal Information about individuals in a way that, overall, is at least substantially similar to the way the Australian Privacy Principles protect the information; and
- (ii) having mechanism that the individual can access to take action to enforce protection.

You agree that we may disclose your Personal Information to entities in Whitelisted Countries and Schemes subject to any pre-requisites set by legislation, and in such case we will not be obliged to take reasonable steps to ensure that these overseas recipients comply with the Act and the Australian Privacy Principles.

- (e) In any case, by agreeing to this Policy, you agree to the disclosure of your Personal Information to entities outside of Australia including those listed above and that, subject to our compliance with our obligations under the Act, we will not be liable to you for any breach of the Act, including any misuse or loss of your Personal Information by these overseas recipients.

10

## **SENSITIVE INFORMATION**

### **10.1 What is Sensitive Information**

The Act considers Sensitive Information any Personal Information that relates to or includes racial or ethnic origin, political opinions, membership of a political association, religious beliefs, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practice, criminal record, health or genetic information, biometric information used for biometric verification or identification (“**Sensitive Information**”).

### **10.2 Collection and disclosure of Sensitive Information**

- (a) We might collect Sensitive Information as part of market segmentation analysis. This would be limited to the type of business and membership of trade organisation...
- (b) We will inform you when we collect Personal Information of yours that may be considered Sensitive Information and request your consent by:
  - (i) requesting the information from you in a written form or written request; or
  - (ii) informing you and requesting your consent to obtain Sensitive Information regarding you from another party.
- (c) By providing the information or consent to collection, you consent to our collection of the Sensitive Information.
- (d) We will not:
  - (i) collect Sensitive Information except when reasonably necessary for one or more of our functions and activities;
  - (ii) use or disclose the Sensitive Information for secondary purposes to the primary purpose of collection unless the secondary purpose is directly related to the primary purpose of collection and within a reasonable expectation of use; or
  - (iii) use or disclose the Sensitive Information for direct marketing purposes unless you have consented to the use for this purpose.

### **10.3 Additional security measures for Sensitive Information**

In relation to certain Sensitive Information we collect, we employ additional security measures which may include:

- (a) Limit access to this information, cyber security software, multi factor authentication

## 11 CREDIT INFORMATION AND CREDIT REPORTING

### 11.1 Application

- (a) This section 11 of this Policy outlines additional information for the purposes of Part IIIA of the Act and the Credit Reporting Code (“**Code**”).
- (b) Personal Information relating to individuals which CBS may collect may include credit information and credit eligibility information about individuals as defined by the Act (“**Credit Information**”). This information may be collected, held and used by CBS in its activities as a credit provider and also in its activities as an agent for other credit providers.
- (c) In this additional section we explain how and why we collect Credit Information about individuals, how we use such information within CBS, and what controls individuals have over our collection and use of information about them.
- (d) This additional section is relevant to individuals who are current and former credit customers, as well as other individuals that CBS deals with in connection with credit we provide to our credit customers (for instance, such individuals may be guarantors or directors of corporate customers) or information we collect on behalf of other credit providers in CBS’ capacity as an agent for such credit providers.

### 11.2 Type of information collected

CBS collects, holds and uses various types of credit-related information about individuals, which information includes:

- (a) identification information such as current and prior names and addresses, age, contact details and driver's licence number;
- (b) applications for credit (including the name of each relevant credit provider), the type and amount of that credit and the fact CBS has accessed Credit Information to assess a relevant application for its business services or processing a credit application as an agent for another credit provider;
- (c) CBS and other credit providers are or have been a provider of credit to an individual (or an entity associated with an individual) and the type, characteristics and maximum amount of credit that have been provided or will be provided;
- (d) the date that any credit contract between CBS or other credit providers and an individual was entered into and the date that it comes to an end;
- (e) payments owed to CBS or another credit provider, in connection with credit provided to an individual (or an entity associated with an individual) or in relation to which an individual is a guarantor (and, if there is subsequently paid any such overdue payment, the fact of that payment);
- (f) whether in the opinion of CBS or another credit provider an individual has committed a serious credit infringement;
- (g) whether an individual has entered into arrangements with CBS or other credit providers in connection with credit provided to the individual (or an entity associated with the individual);
- (h) court proceedings information, personal insolvency information and credit-related publicly available information;

- (i) scores, ratings, summaries, evaluations and other information relating to an individual's credit worthiness which is derived by CBS or its agents wholly or by Credit Reporting Bodies ("CRBs") partly on the basis of the information above; and
- (j) certain administrative information relating to credit, such as account and customer numbers.

While the Act uses a variety of terms to refer to such information as referred to above, for ease of understanding and reading this policy, such information is referred to hereinafter as "Credit Information".

### **11.3 Manner of collection**

- (a) Credit information may be collected by CBS in a number of ways including:
  - (i) being provided by an individual directly to CBS or by persons acting on behalf of the individual (such as on applications or other forms and via our CBS Service);
  - (ii) being provided by CRBs and/or other credit providers and/or trade suppliers with the consent of the individual;
  - (iii) being information provided by the individual on an application for credit with another credit provider, in circumstances where CBS acts as that credit provider's agent;
  - (iv) being information that is in the public domain; and
  - (v) being information that is derived by CBS from an individual's usage and (where applicable) trade on and transactional history on any account (of the individual or of an entity associated with the individual) held within CBS.
- (b) At or before the time any Credit Information is collected by CBS about an individual, we will take reasonable steps to ensure that the individual is made aware of who we are, the fact that the individual is able to gain access to the information held about the individual, the purpose of the collection, the type(s) of entities to which we usually disclose such information collected about the individuals, any laws requiring the collection of the information and the main consequences for the individual if all or part of the information is not collected.

### **11.4 How information may be held**

CBS may hold Credit Information and store it in the same manner as other information under this Policy.

### **11.5 Use and Disclosure of Credit Information**

CBS may, as permitted by law, collect, hold, use or disclose Credit Information held about an individual for the purposes for which such information is collected. These purposes include:

- (a) to form decisions as to whether to provide an individual, or an entity associated with an individual, with credit or to accept an individual as a guarantor;
- (b) to make assessments relating to an individual's credit worthiness which are used by CBS ongoing decision-making processes regarding provision of credit and the amount of such credit;
- (c) to assist an individual or entity associated with the individual in completing a credit application with other credit providers, in circumstances where CBS acts as the credit provider's agent;

- (d) to participate in the exchange of Credit Information with other credit providers including obtaining from and providing information to CRBs and other credit providers and/or trade suppliers as permitted by Part IIIA of the Act and the CR Code;
- (e) to assist an individual or entity associated with the individual to avoid defaulting on credit-related obligations to CBS or other credit providers;
- (f) to undertake debt recovery and enforcement activities, including in relation to guarantors, and to deal with serious credit infringements;
- (g) to deal with complaints and meet legal and regulatory requirements; and
- (h) to assist other credit providers to do the same.

#### **11.6 Other permitted disclosure**

- (a) Some Credit Information may only be used or disclosed under the Act for some of the above purposes or in some particular circumstances.
- (b) Generally, CBS will be permitted to use or disclose Credit Information held about an individual where the individual has consented to the use or disclosure.
- (c) CBS may disclose Credit Information to a CRB and/or other credit providers about an individual for such purposes as set out above and as permitted by the Act. For example, CBS may be permitted to disclose Credit Information to a CRB in such circumstances as where the individual has consented to the disclosure or where the individual has failed to meet payment obligations in relation to credit provided by CBS or if the individual has committed a serious credit infringement. Similarly, CBS will generally be permitted to disclose Credit Information to another credit provider about an individual where the individual has consented to such disclosure.

#### **11.7 Credit Reporting Bodies**

- (a) Part IIIA of the Act outlines:
  - (i) the types of Personal Information that credit providers can disclose to a credit reporting body (CRB), for the purpose of that information being included in an individual's credit report;
  - (ii) what entities can handle that information, and
  - (iii) the purposes for which that information may be handled.
- (b) CRBs may include Credit Information provided by CBS in reports provided to other credit providers to assist such other credit providers to assess the individual's credit worthiness.
- (c) Presently CBS does not share Credit Information with any CRB. CBS may, in the future, disclose Credit Information to a CRB, but prior to disclosing any Credit Information about individuals to any other CRB, CBS will amend its Credit Reporting Privacy Policy to set out the name and contact details of any such other CRB and will post a notification of the change to the Credit Reporting Privacy Policy on CBS' website.
- (d) It is important to note that individuals have certain rights in respect of CRBs and the information a CRB holds about the individual and those rights include:
  - (i) Opting out of direct marketing pre-screenings – A CRB may use an individual's Credit Information to assist a credit provider to market to that individual by pre-screening the individual for direct marketing by the credit provider. This process is known as a "pre-

screening". If an individual does not want a CRB to use that individual's information for the purpose of pre-screening, the individual has the right under the Act to contact the CRB to request that they exclude the individual from such processes.

- (ii) If an individual is a victim of fraud (including identity-related fraud) – An individual is entitled under the Act to request that a CRB not use or disclose credit reporting information they hold about the individual in circumstances where the individual reasonably believes that they have been or are likely to be a victim of fraud, including identity-related fraud. The period while this applies is called a "ban period". An individual can make such a request to any CRB, including those listed above.

## 12 CHILDREN

### 12.1 Services not intended for Children

- (a) CBS' services are not intended for use by children, and we will not typically collect information from any unsupervised child under the age of 13.
- (b) If you are under the age of 13, you may not use our services unless your parent/s or guardian has provided us with their express authorisation for your use of our services.

## 13 ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

### 13.1 Our commitment

CBS is committed to and takes all reasonable steps in respect of maintaining accurate, timely, relevant, complete and appropriate information about our customers, clients and website users.

### 13.2 Access to information

- (a) Any individual may request access to Personal Information about them held by CBS. Such a request for access to Personal Information is to be made to our Privacy Officer, whose details are set out below.
- (b) We will respond to any requests for access or correction within a reasonable time of receipt of the request, but by no later than 30 days of the request being received.
- (c) Please note that we do require that, as part of any request by an individual for access to Personal Information, the individual verify their identity so that we may be satisfied that the request for access is being made by the individual concerned.
- (d) Please note that we are not required to give an individual access to Personal Information in circumstances where:
  - (i) we reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
  - (ii) giving access would have an unreasonable impact on the privacy of other individuals; or
  - (iii) the request for access is frivolous or vexatious; or
  - (iv) the information relates to existing or anticipated legal proceedings between us and the individual, and would not be accessible by the process of discovery in those proceedings; or

- (v) giving access would reveal the intentions of CBS in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
  - (vi) giving access would be unlawful; or
  - (vii) denying access is required or authorised by or under an Australian law or a court/tribunal order; or
  - (viii) both of the following apply:
    - (A) we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in;
    - (B) giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
  - (ix) giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
  - (x) giving access would reveal evaluative information generated within CBS in connection with a commercially sensitive decision-making process.
- (e) If we refuse to provide an individual with access to their Personal Information or to correct the Personal Information held by us about them, then we will provide reasons for such refusal. Such reasons will set out the grounds for refusal, the mechanisms available to complain about the refusal and any other matters that are required by the Act.

### 13.3 Correction of Information

- (a) Inaccurate information will be corrected upon receiving advice to this effect. To ensure confidentiality, details of an individual's Personal Information will only be passed on to the individual if we are satisfied that the information relates to the individual.
- (b) From time to time, and having regard to the purpose of the collection and use of Personal Information about individuals, we may contact individuals to seek confirmation that the Personal Information provided to us by the individual is accurate, up-to-date and complete.

## 14 COMPLAINTS

### 14.1 Making a complaint

If an individual has a complaint about this Policy or our collection, use or safe disposal or destruction of Personal Information about the individual, any complaint should be directed in the first instance to our Privacy Officer at the contact details set out in the 'Contacting us' section of this Policy.

### 14.2 Handling of complaints

- (a) CBS has a Complaints Handling Policy which may be viewed at: [\[URL to website privacy policy landing page\]](#) which outlines the way in which we manage complaints
- (b) Generally:
  - (i) we will acknowledge receipt of a complaint within 3 working days of receipt;
  - (ii) we aim to resolve complaints within 30 days of receipt; and

- (iii) if a complainant is not satisfied with the outcome of our internal complaints procedure in respect of our privacy practices, then the complainant may refer their complaint to the Office of the Australian Information Commissioner (“**OAIC**”). The website for the OAIC is: [www.oaic.gov.au](http://www.oaic.gov.au).

## 15 **CHANGES TO POLICY**

If we decide to, or are required to change this Policy, we will notify you of any such amendments on our websites and post changes on our Privacy Policy webpage so that users may always be aware of what information is collected by us, how it is used, and the way in which information may be disclosed. As a result, please refer back to this Policy regularly to review any amendments.

## 16 **CONTACTING US**

### 16.1 **Contacting us**

For concerns, complaints or further information regarding this Policy and our policies and procedures regarding privacy and data security, please contact us at the following address:

**The Privacy Officer – CBS**

Telephone: **+61 7 2104 2445**

Email: [support@contactcbs.com](mailto:support@contactcbs.com)

We will respond to your enquiry as soon as possible.

### 16.2 **Contacting the OAIC**

If you are not satisfied with our response to your enquiry and for more information on privacy legislation, please visit the website of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).