

Commercial Privacy Policy & Collection Notice

1. Privacy Statement

Capricorn Sandstone Quarries Pty Ltd ACN 097 933 205 and our related body corporates (**we/us/our**) consider your privacy to be important and we take our responsibility to protect your personal information seriously.

This Privacy Policy (**Policy**) sets out how we collect, hold, use and disclose information about individuals who deal or interact with us. We treat all personal information collected by us in accordance with this Policy, the *Privacy Act 1988* (Cth) (**Privacy Act**), and the Australian Privacy Principles (**APP**). If there is any inconsistency between the Privacy Act, APP and this Policy, the Privacy Act and APP will prevail to the extent of the inconsistency.

For information about management of personal information specific to credit reporting, please see our Credit Reporting Policy.

2. Personal information collected by us

2.1 How we collect information

We collect a variety of personal information that is reasonably necessary for the purposes of conducting and improving our business and our products. This information is collected from a range of sources including:

- (a) through our website <www.capricornsandstone.com.au> (the **Site**);
- (b) through our ordering and payment processing software platform;
- (c) from documentation that you provide to us, such as through a credit account application, purchase order or general enquiry;
- (d) from publicly available databases and websites as a consequence of our own market research; and
- (e) through our interactions with (whether by email, telephone, in person etc.) you in the ordinary course of our business.

2.2 Collection from third parties

Typically we will only collect personal information from you directly. However, in some circumstances we may also collect your personal information from certain third parties, for example from:

- (a) your employer, in relation to products that we are supplying to you or your employer;
- (b) a third party (such as a trade reference or credit reporting body) to assist us in assessing your application for credit; or
- (c) where we need information from your current or former employer to assist us in assessing your job application or expression of interest as a contractor or employee.

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2.3 Nature of information

(a) General

Personal information collected by us includes:

- (i) your name;
- (ii) your date of birth;
- (iii) your business or personal address;
- (iv) your business name and company details;
- (v) your contact details such as your mobile number, telephone number and email address;
- (vi) your transactional data;
- (vii) your payment details including your credit card information;
- (viii) all logs, which may include information such as your Internet Protocol (IP) address, browser type, browser version, clickstream data, the pages of our Site that you visit, the time spent on any pages of our site and other log related information relating to your use of our website; and/or
- (ix) all other information that you provide to us voluntarily and directly, including in any enquiry made to us.

(b) Government Identifiers

We do not generally collect or hold government identifiers (i.e. passport number, licence number, Medicare number or tax file number). Where we do, such information will not be disclosed to non-associated entities without your express consent.

(c) Site Data

Whenever you visit our Site, our servers automatically record information for statistical purposes about your usage of our Site, such as:

- (i) the type of browser used;
- (ii) the referring URL;
- (iii) the IP address;
- (iv) the number and type of pages viewed;
- (v) the date and time of visits; and
- (vi) the exit URL.

This information remains anonymous and we do not link it to any other personal information.

(d) Cookies

We may utilise "cookies" through our Site which enable us to monitor traffic patterns and to serve you more efficiently if you revisit our Site. A cookie does not identify you personally, but it does identify your computer. You can set your browser to disable cookies or to notify you when you receive a cookie

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and provide you with an opportunity to either accept or reject it in each instance. If you disable cookies, you may not be able to access certain areas or features on our Site.

(e) **Web Beacons**

Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users or to access cookies.

Unlike cookies which are stored on the user's computer hard drive, web beacons are embedded invisibly on web pages (or in e-mail). Web beacons may be used to deliver or communicate with cookies, to count users who have visited certain pages and to understand usage patterns.

Like many sites, we use web beacons to collect information which is done in accordance with this Policy.

3. **Basis for collection**

We collect personal information in the following circumstances:

(a) **Supply of Products**

Where you have requested that we provide you with our products, we need to obtain personal information to:

- (i) enter into our agreement with you; and
- (ii) deliver to you our products.

(b) **Legitimate Business Purposes**

We may also collect your personal information (even where it is not related to us entering into an agreement or contract with you) where we consider:

- (i) you will not be detrimentally impacted;
- (ii) you would reasonably expect us to engage in such use; and
- (iii) it is necessary to fulfil our legitimate interests.

This may include, for example:

- (iv) for the improvement of our business and the delivery of our products;
- (v) for the improvement of our website and any information provided through our website;
- (vi) responding to enquiries about our products;
- (vii) assessing credit applications and guarantees;
- (viii) conducting checks for credit worthiness or fraud;
- (ix) assessing job applications or expressions of interest;
- (x) assessing and investigating insurance claims or risks; and

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- (xi) managing complaints or to enable our third party service providers (including Google Analytics) to provide us with such services.

(c) **Legal Compliance**

There are certain situations in which we may be required to use your personal information to comply with a legal or regulatory requirement or court order, including through the *Personal Property Securities Act 2009* (Cth) and laws governing State and Territory real property and security interests (for example, to register and search for security interests).

(d) **Consent**

In certain circumstances we may request that you specifically consent to our collection or use of your personal information. Where we do so, we will provide an explanation of the nature of the use to which you are consenting. If we have requested your consent, you can withdraw your consent at any time by contacting us using the contact information set out in this policy.

4. **Consequences of not collecting information**

If we do not collect your personal information we may be unable to provide you with our products, grant credit to you, process or assess your application, finalise payment of products you have ordered, deliver products you have ordered, or otherwise do business with you or an entity you are connected with.

5. **Use of personal information**

In general, we use personal information for providing, evaluating, improving, personalising and developing our business, our products and our services.

More specifically we use personal information for:

- (a) improving our products, services and customer satisfaction;
- (b) providing a product or service that has been requested;
- (c) promoting and delivering our products to you;
- (d) our internal research and statistical purposes (including market segmentation and customer value analysis); and
- (e) enabling us to forward to you other information or material which we believe may be of interest to you.

6. **Disclosure of personal information**

We may disclose your personal information to our related bodies corporate and third parties for the purposes set out above. The third parties to whom we may disclose your personal information include:

- (a) manufacturers, suppliers, and contractors we engage with in the course of our business;
- (b) insurers, assessors, and underwriters;
- (c) professional advisors and consultants (such as lawyers, accountants, and auditors);
- (d) debt collectors;
- (e) third-party payment processing platforms such as PencilPay;

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- (f) your guarantors, trade references and security providers;
- (g) credit reporting bodies, credit providers and other information providers;
- (h) government and regulatory authorities (as required by law);
- (i) website hosts;
- (j) organisations that assist us in research and development; and
- (k) third party service providers to whom we outsource some of our functions.

In some circumstances, we may also disclose your personal information to a third party where it becomes necessary for us to do so as part of enforcing or defending any legal claim or dispute that is made or raised against us.

7. Protecting your personal information

7.1 Steps we take

We take reasonable steps to protect all personal information we hold from:

- (a) misuse, interference and loss; and
- (b) unauthorised access, modification or disclosure.

The precautionary steps we take to protect personal information include:

- (a) adopting measures to protect our computer systems and networks for storing, processing and transmitting personal information;
- (b) adoption of procedural and personnel measures for limiting access to personal information by our staff;
- (c) regularly reviewing our information collection, storage and processing practices; and
- (d) such other security measures we consider reasonable and appropriate from time to time.

Notwithstanding that we use our best endeavours to protect all personal information we collect and hold, we unfortunately cannot guarantee the complete security of the personal information.

7.2 De-identifying and deleting personal information

When your personal information is no longer required to be kept by us, we will take reasonable steps to destroy or delete your personal information in a confidential manner.

8. Third party sites

We may use third party tools to track your usage of our Site.

Our Site may also contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

You acknowledge that we have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third party sites or services whatsoever.

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You should be aware that your ability to opt-out of a third-party tool or platform will depend on the conditions governing your agreement with that third party.

9. Overseas Disclosure

9.1 Overseas IT service providers

We may disclose personal information to outsourced information technology service providers, including cloud computing providers and data storage providers, based overseas.

We will take reasonable steps to ensure such overseas recipients do not breach the APP or are subject to laws or a scheme substantially similar to the APP.

9.2 Disclosure for analytics

We may use Google Analytics to track usage of our Site. Google Analytics is a web analysis service provided by Google. Google utilises the data collected to track and examine the use of the Site, to prepare reports on the Site's activities and share them with other Google services.

Google may use the data collected to contextualise and personalise the ads of its own advertising network. Personal data collected by Google includes cookie and usage data, which is processed in the USA. You can find Google's privacy policy here: <http://www.google.com.au/policies/privacy/>.

9.3 Consent to overseas disclosure

Other than as stated above we will only disclose your personal information to an overseas recipient if:

- (a) you consent to the transfer; or
- (b) the disclosure of the information is required or authorised by or under an Australian law, other applicable law or a court/tribunal order.

10. Accessing and updating your personal information

If you wish to obtain access to the personal information we hold that relates to you, please send your request by email to us.

Depending upon the nature and extent of the personal information you seek to access, you may be asked:

- (a) to put your request in writing with evidence of your identity to verify that you are who you say; and
- (b) to provide further details to assist us in responding to your request in a timely manner.

We will respond to a request for access to personal information within a reasonable period after the request is made.

10.2 Access to Personal Information

We will provide you with access to your personal information held by us unless:

- (a) giving access would be unlawful; or
- (b) denying access is required under the Privacy Act or any other applicable law.

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10.3 Amending your personal information

We endeavour to keep all personal information we hold accurate, up to date and complete. If at any time you wish to correct any of your personal information, please contact us.

If we elect not to correct your information, we will notify you, within a reasonable time, of the reason for our refusal, the mechanisms available for you to complain about our refusal and such other matters required by the Privacy Act.

If you wish to have your personal information deleted, please let us know and we will take all reasonable steps to delete it, unless we need to keep it for legal reasons.

11. Variations

We reserve the right to vary this Policy from time to time without further notice to you. Any variations made will be updated on our Site. It is your responsibility to check this Policy periodically to ensure you are aware of any changes made to it. We will not restrict or fundamentally change your rights under this Policy without using our best endeavours to first provide you with notice.

12. Complaints

We strive to ensure our compliance with this Policy and to regularly review our practices against it.

If at any time you have a complaint against us regarding our Policy, including a breach of the Privacy Act, we invite you to make a complaint by contacting us directly. All complaints made will be dealt with in confidence. We endeavour to respond within 30 days of receipt of a complaint with a resolution or proposed resolution to the issue raised.

You may also make a complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of your personal information. Information on making a privacy complaint can be found on their website at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

13. Contact details

Our Privacy Officer handles enquiries and requests relating to our handling of personal information and can be contacted if you have any questions about our management of personal information or compliance with the Privacy Act:

In writing: Capricorn Sandstone Quarries
PO Box 5164, Red Hill
Rockhampton QLD 4701
By telephone: 07 4934 7336
By email: sales@capricornsandstone.com.au

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