

Document Control

Reference Number	Version	Title	Owner / Approver	Author	Issued Date	Review Date
POL 014	1.0	Privacy Policy	General Manager	HR Manager	2 Feb 2015	2 Feb 2017

Amendments (show history of amendments)	Date	By whom
No amendments have been issued.		

1. Overview

This policy overviews CHC's approach to Privacy in accordance with the Privacy Act as well as the Spam Act, the Do Not Call Register Act and health privacy legislation.

2. Purpose

To ensure employees and customers are aware of the Australian Privacy Principles in the Privacy Act and how CHC is committed to protecting personal information. The policy also outlines the type of information we may collect and share and how information may be updated, changed or deleted.

3. Definitions

Our, We or CHC	Cairns Hardware Company Pty Ltd.
You	Employee, Customer, Member of the Public
Shall, Must	Indicates the statement is mandatory.
May	Indicates an option.
Privacy Officer	Nominated Company Representative.
APP's	Australian Privacy Principles (Contained in the Privacy Act)

4. Your Privacy

Commitment

CHC is committed to protecting your personal information in accordance with the Australian Privacy Principles (APP's) in the Privacy Act as well as other applicable legislation such as the Spam Act, the Do Not Call Register Act and health privacy legislation.

This Privacy Policy is available on the CHC website at www.cairnshardware.com.au, or you can request a copy by contacting our reception on (07) 4040 2200.

5. Types of Personal Information Collected

The types of personal information collected and held by CHC will vary depending upon your dealings with us. Information collected may include any or all of the following;

- Name, Address, Telephone numbers and other contact details
- Associated Company names, positions, occupations and other business details
- Electronic addresses
- Bank account details
- Credit card details; and
- Transaction details relating to your use of our products, services or benefits.

6. Examples of What We Collect and How We Collect It

In Store Attendance and Purchases

We may collect a range of information about you and what you purchase in our stores. This may include your credit card, your name and address, your business details and information about where our goods are to be delivered or used. We may also collect information regarding the purchases you make. We may capture images or sound recordings of you through CCTV cameras or through other security devices.

Third Parties

You may be engaged by and undertake purchases through third parties associated with CHC. For example a supplier might run a "direct to you" promotion or sales event. As such CHC may collect and share information to facilitate the introduction of third parties or to facilitate your purchases and deliveries. Note however that CHC is not responsible for the privacy practices of these third parties and this Policy does not apply to them. These businesses should have their own privacy policies, which we encourage you to read before supplying information to them.

Credit Accounts

We offer our customers access to credit terms. Personal information related to your credit accounts (opening, maintaining and closing) shall be collected as required to manage your account.

Mailing Lists and Data Bases

In undertaking our business, we collect personal information in order to provide you with information about our goods and services. We may collect information to help us customise our offers to you, including information about your shopping or product preferences.

Web and Social Media

We often undertake business or communicate with you via the web and social media i.e website, Facebook, Twitter or Instagram accounts or other social media sites. Your personal information, as well as email address and social media tags / account details may be utilised.

Functions or Events

We may collect your personal details prior to or during social events. This may include dietary and accessibility requirements.

Competitions or Surveys

In online or printed format, we may collect your personal information as well as your opinions and feedback.

Feedback

You may send us an enquiry or provide us feedback through our online activities, via a staff member or in writing. As such we may collect your personal details and details of your enquiry or feedback and information about our response.

Sponsorships

We may collect information included in your proposal, or seek your approval to obtain additional information.

Applying for a Job

We may collect the information you include in your job application, including your personal information, qualifications, job history and referee details. We may also collect information supplied by referees, previous employers, medical practitioners, educational institutions and skills assessment centres.

7. Why We Collect Information

The main purposes that we collect, hold, use and dispose personal information include;

- Opening, maintaining and closing accounts
- Credit control
- Processing transactions
- Answering an enquiry that you make
- Security of our stores, goods, customers and staff
- Loyalty programs
- Promoting our products and services
- Performing research and statistical analysis, including for customer satisfaction and service improvement purposes
- Tailoring existing or new products, services or offers
- Recruiting staff and contractors
- General administration.

8. Sensitive Personal Information

We may need to collect sensitive information, such as health records during recruitment. We will only do this where it is reasonably necessary for our functions, decision making or where required at law to do so.

CHC will seek separate approval from you when sensitive personal information is required.

9. Technology

We may collect information related to your use of technology. Information is automatically collected through your use of the CHC website and on line account system, including the use of cookies. Cookies are small text files that websites or apps may place on your computer or device. Most often, cookies are used to recognize repeat users of websites and remember user preferences. We may use information supplied by cookies to help us improve your user experience or to modify our offers to you.

The internet is not considered a secure method of transmitting information. Accordingly, other than where CHC uses secure socket layer technology (SSL) to ensure information (such as credit card information) is securely transmitted and processed, CHC cannot and does not accept responsibility for the security of information that you send to or receive from us over the internet or for any unauthorised access or use of that information.

10. Direct Marketing and Opting Out

By providing your personal information, such as name, address, email address and telephone numbers to CHC, you consent to CHC contacting you for any purpose related to our business. We may send this direct marketing in a variety of ways, including by mail, email, social media, SMS, MMS, telephone and Apps.

You can opt out of direct marketing by contacting our Privacy Officer or by speaking to one

of our Sales Representatives.

You may also use the unsubscribe facility that we include in our electronic messages to opt out of receiving those messages.

11. Sharing Personal Information

We may share your personal information with third parties where appropriate for purposes set out including;

- Financial institutions for payment processing or account management activities
- Business partners, such as manufacturers and suppliers
- Insurance companies
- Third party suppliers of services, such as Credit Collection Agencies, Marketing Organisations, Calls Centres, Mailing Houses, Research organisations and suppliers of IT services and equipment used in our business, business advisors (recruitment, auditors, lawyers) and the like
- Referees who's details are provided to us by job applicants
- Regulatory, investigative or government bodies to comply with laws.

We may ask third party suppliers to contact you directly for a specific purpose, and provide us with information collected from you.

We may utilise and share information with cross boarder organisations. Examples include but are not limited to;

- IT suppliers storing data via cloud service, or where our data bases are hosted on servers located overseas
- Overseas suppliers who require customer details for special orders or delivery information.

CHC will use the personal information it collects for the purpose disclosed at the time of collection, or otherwise as set out in this Privacy Policy. CHC will not use your personal information for any other purpose without first seeking your consent, or where authorised or required by law.

12. How We Store Information

CHC stores personal information in a combination of computer storage facilities, paper based files and other records. In so doing, we have taken numerous steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure.

Additionally CHC takes reasonable steps to destroy or permanently de-identify information that we no longer need.

13. Accessing and Correcting Your Personal Information

CHC will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date. If your personal details change, such as your address or phone number, please contact one of our branches.

At your request, CHC will provide you with a copy of any personal information which we hold about you, unless an exception under the Privacy Act 1988 applies. We may charge a fee for retrieving this information, in which case we will inform you of the fee and obtain

your agreement to that fee before providing the information.

We will promptly acknowledge and investigate any complaint about the way we manage your personal information.

14. How to Contact CHC or Make a Complaint

If you have any questions about this Privacy Policy, if you wish to update information we hold about you or if you wish to make a complaint about our collection, use or disclosure of your personal information under this policy, please contact:

The Privacy Officer
Cairns Hardware Company Pty Ltd
PO Box 5553 Cairns QLD 4870
Phone: 07 4040 2200
Fax: 07 4051 3044
Email: hr@cairnshardware.com.au

CHC is committed to helping you with any issues regarding privacy.

15. Changes to this Policy

CHC may amend this Privacy Policy from time to time. The current version will be posted on our web site and a copy may be obtained by contacting any of our Branches or the Privacy Officer.