

# Privacy Policy

## Summit Rural (WA) Pty Ltd t/as Whitfert

Summit Rural (WA) Pty Ltd trading as Whitfert (“**WHITFERT**”) is a subsidiary of Sumitomo Corporation (holding 80%) and its subsidiary Sumitomo Australia Pty Ltd (holding 20%).

WHITFERT’s policy on the collection, use and disclosure of personal information based on the Privacy Act 1988 and the 2012 Amendments to the Act is set out below:

### Part I - PERSONAL INFORMATION

#### 1. What Personal Information does WHITFERT collect and why?

WHITFERT collects personal information:

- (a) for the purposes of recruitment and employment (“**Employment Information**”); and
- (b) in order to provide goods and services to customers (“**Customer Information**”).

The type of personal information we collect is usually a person’s name, address, telephone numbers.

**Personal Information** may also include the following:

- (a) in relation to **Employment Information** - date of birth, CV’s and resumes, education, qualification, language skills, medical information and emergency contact details; and
- (b) in relation to **Customer Information** - information on use of our products and services.

#### 2. How WHITFERT may use your Personal Information

**Employment Information** may be used for recruitment, employment and human resource management purposes.

**Customer Information** may be used for a number of purposes connected with our business operations, which include:

- (a) processing your orders, billing and administering your account;
- (b) carrying out credit checks and scoring;
- (c) carrying out market and product analysis and marketing our products and services generally; and
- (d) contacting you about and providing you with our products and services.

#### 3. How WHITFERT collects and holds your Personal Information

WHITFERT collects Personal Information in a number of ways but usually directly from you including when you:

- (a) place an order with WHITFERT to provide you with products and/or services;
- (b) set up an account with WHITFERT;
- (c) provide WHITFERT with your details to manage your account;
- (d) contract with WHITFERT;
- (e) browse WHITFERT’s website; and

WHITFERT stores Personal Information on its IT systems and servers. WHITFERT also stores hard copy documents on which Personal Information is contained at its head office and various site offices in accordance with its document management system.

#### Use of Information

WHITFERT may disclose or receive personal information or documents about you:

- (a) to/from its related body corporate including Sumitomo Corporation, Sumitomo Australia Pty Ltd and Sumitomo Corporation Asia & Oceania Pte Ltd, who will protect and use the information only in accordance with this policy;

- (b) as required by law or law enforcement agencies;
- (c) in relation to **Employment Information** – to/from human resource and payroll services providers who have agreed to keep the information confidential;
- (d) in relation to **Customer Information** - to/from service providers or other contractors, in relation to the goods or services provided to you, and who have agreed to keep the information confidential.

Your personal information may be transferred overseas, as Sumitomo Corporation is headquartered in Japan and Sumitomo Corporation Asia & Oceania Pte Ltd in Singapore for the purposes listed above. It is not likely that your personal information is transferred to any other country.

We will not use your information other than described above unless we have your consent.

## Part II - CREDIT INFORMATION MANAGEMENT POLICY

This section 6 applies to individuals who apply for commercial credit from WHITFERT (the **Credit Provider**) and contains important information about how WHITFERT collects, stores, uses, manages and protects your credit information (**PCI**).

In this section:

**Credit** means a contract, arrangement or understanding under which either payment of a commercial debt owed by one person to another is deferred for at least 7 days, or where a person incurs a commercial debt to another person, and defers the payment of the debt for at least 7 days.

**Credit Information** is essentially information about your credit worthiness and can include personal information such as your name, address, repayment history, defaults on payment and court proceedings.

**Credit Eligibility Information** means credit reporting information that was disclosed to us by a credit reporting body such as Dun and Bradstreet (CRBs) or CP Derived Information.

**CP Derived Information** means your personal information that is derived by us from credit reporting information we receive from CRBs that has a bearing on your credit worthiness.

**PCI** includes Credit Information, Credit Eligibility Information and CP Derived Information.

Generally, words and phrases in this Policy are used in accordance with or as they are defined in the Privacy Act.

By:

- (a) enquiring about the provision or the continuation of Credit;
- (b) applying for the provision of Credit;
- (c) accepting or continuing to accept Credit from WHITFERT;
- (d) action, or applying to act, as guarantor for a person applying for Credit from WHITFERT, after this section has been brought to your attention, you acknowledge and consent to the collection, use, storage or disclosure of your PCI by WHITFERT in accordance with this Policy and the Privacy Act.

If you do not agree to WHITFERT handling your PCI in the manner set out in this Policy you should not provide WHITFERT with any of your PCI.

### 1. What PCI does WHITFERT collect and why?

WHITFERT may collect, hold and disclose different PCI depending upon how you interact with WHITFERT. If you apply to receive Credit from WHITFERT, or offer to act as a guarantor, we may collect, hold and disclose PCI about you. This may include:

- (a) your Personal Information that identifies you - name, date of birth and address;
- (b) repayment history information;
- (c) a statement that an information request has been made to credit reporting bodies;

- (d) the type of commercial credit, and the amount of credit, sought in your application to WHITFERT as a Credit Provider;
- (e) defaults on payments information;
- (f) information about court proceedings or personal insolvency relating to Credit;
- (g) publicly available information about creditworthiness; and
- (h) any credit score or credit risk assessment indicating a CRB's or WHITFERT's analysis of your credit worthiness.

We may also collect Personal Information about you that is not PCI which is be dealt with in accordance with sections 1 to 3 of this Privacy Policy above.

WHITFERT may collect PCI for a number of reasons or purposes, including:

- (a) set up an account and manage your accounts with WHITFERT;
- (b) assessing an application for Credit;
- (c) assessing an application to act as guarantor in relation to Credit;
- (d) providing Credit;
- (e) managing the provision of Credit and collection of repayments or enforcement of guarantees;
- (f) assessing and dealing with what we reasonably believe to be a serious credit infringement; and
- (g) assisting you to avoid defaulting on your obligations to repay a debt.

## **2. How WHITFERT may use your PCI**

If we collect your PCI, we may:

- (a) use that information for any of the reasons or purposes described above;
- (b) store that information in accordance with this Policy;
- (c) share that information with our related bodies corporate;
- (d) pass that information to other Credit Providers with an Australian link or an enforcement body where we believe there has been a serious credit infringement;
- (e) provide your PCI to a person who is proposing to act as guarantor;
- (f) provide your PCI to a person who is acting as guarantor where necessary to enforce a guarantee;
- (g) disclose your information to a debt collector or other debt enforcement agency; or
- (h) provide that information to third parties as required by law.

We will not disclose repayment history information about an individual unless permitted by the Privacy Act.

## **Part III – INFORMATION APPLIES TO PERSONAL INFORMATION & PCI**

The following information applies to both your personal information and, for those individuals who have applied for Credit with WHITFERT, your PCI.

### **1. Security of and Access to your Personal Information**

We will take reasonable steps to ensure that the personal information we collect, use or disclose is:

- (a) accurate;
- (b) complete;
- (c) up-to-date; and
- (d) stored in a secure environment protected from unauthorised access, modification or disclosure.

Upon your request, WHITFERT will provide access to your personal information we hold, except in certain prescribed circumstances, including emergency situations, specified business imperatives and law enforcement or other public interests.

### **Cookies**

Cookies are small files sent by a website and stored in files within your computer's browser. Websites can access only the cookies that they have stored on your computer. For example, if WHITFERT stores a cookie on your browser, only WHITFERT may access its own cookie but not that of another company.

WHITFERT uses cookies for the following purposes:

- (a) to help us recognise your browser as a previous visitor and save and remember any preferences that may have been set while your browser was visiting the Site. For example, we may save your login information so you don't have to sign in every time you visit the Site;
- (b) to help us customise the content you see when you visit the Site;
- (c) to help measure and research the effectiveness of our interactive online content, features, advertisements, and other communications; and
- (d) to track Site analytics and use, and to improve Site services.

### **Links to Non-WHITFERT and Third Party websites**

This website may contain links to other websites for convenience and information. We do not control those sites or their privacy practices, and we do not endorse or make any representations about third party websites. Any personal data provided to unrelated third parties is not covered by this policy.

### **Cloud Computing Services**

We do not use any cloud computing services at this time, however, in the event we move to use such services, we will revise and update this policy accordingly.

## **2. Can you access your personal information and PCI or request that it be corrected?**

You may request access to or correction of the personal information and PCI that we hold about you by contacting us by any of the methods as set out below (an *Access Request*).

Upon receiving an Access Request we may request further details from you to verify your identity. We reserve the right not to provide you with access to personal information and PCI if we cannot verify your identity to our reasonable satisfaction.

An administrative fee may be charged to cover our costs in providing you with access to your personal information and PCI more frequently than every 12 months. This fee will be explained to you before it has been incurred.

We will respond to your Access Request within a reasonable period of time by:

- providing you with access to your personal information and PCI; or
- rejecting your Access Request, and providing you reasons for this rejection.

Access Requests may be denied where:

- We believe your request is frivolous or vexatious;
- We are unable to verify your identity; or
- you have not paid any applicable administrative fee.

If you believe that the personal information and PCI that we hold is inaccurate or otherwise requires correction, you may send us a correction request. We will review your personal information and PCI and respond to the request within a reasonable period of time, generally within 30 days of your request, unless we agree in writing to a longer time.

We will deal with any request for correction by correcting the information within 30 days from when the request is made, notifying you within a reasonable period of having corrected the information, and within a reasonable period give each recipient of the information written notice of the correction. If we decide not to correct the information, we will notify you, with reasons, within a reasonable time.

We will notify you when we have made a correction at your request, or notify you in writing why we have not made the requested correction.

## **3. How to Complain About a Privacy Breach**

If you believe WHITFERT has breached your right to privacy of personal information, you may complain WHITFERT's Privacy Officer as a first instance, and, if we fail to respond, or you are dissatisfied with our response, to the Office of the Australian Information Commissioner (OAIC) who investigates privacy complaints from individuals about Australian, ACT and Norfolk Island government agencies, and private sector organizations covered by the Privacy Act.

Before you can lodge a complaint with the OAIC, you will generally need to complain directly to the agency or organization you are complaining about and allow 30 days for it to respond. If you do not receive a response (after 30

days), or you are dissatisfied with the response, you may then complain to the OAIC. Here is a link for more information on how to lodge a complaint: <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

#### **4. How WHITFERT Will Deal with a Complaint**

WHITFERT is committed to keeping your personal information private, and in all cases we will treat your personal information with no less protection than that provided for by the National Privacy Principles and the privacy laws that are in force in Australia. However, if you believe we have breached your right to privacy of personal information, we will carefully review your complaint and aim to reply within 30 days of receipt of the complaint. To make a complaint, please do so in writing, using our Privacy Complaint Form no. F04017 and either email it to [privacyofficer@whitfert.com.au](mailto:privacyofficer@whitfert.com.au) or send it by post to The Privacy Officer, Summit Rural (WA) Pty Ltd t/as Whitfert, 54 Beach Street, Kwinana Beach WA 6167.

#### **5. Changes or Updates to this Policy**

From time to time and in line with legislative changes, our privacy policy and procedures will be reviewed and, if appropriate, updated.

#### **6. How to contact us**

If you have any queries or concerns, please contact the Chief Financial Officer on 08 9439 8999, or email at [privacyofficer@whitfert.com.au](mailto:privacyofficer@whitfert.com.au).