

# Zynet Privacy and Credit Reporting Policy

## Privacy and Credit Reporting Policy

Zynet Pty Ltd ACN 087 747 572 and its related entities (**Zynet, us, we, our**) takes your privacy seriously and is committed to responsible privacy practices.

This Privacy and Credit Reporting Policy sets out how Zynet seeks to manage personal and credit related information about individuals, including its customers and prospective customers, in accordance with the *Privacy Act 1988 (Cth)* (**Privacy Act**) and the Privacy (Credit Reporting) Code 2014 (**CR Code**). This Privacy and Credit Reporting Policy describes how we collect, use, disclose, store, and handle your personal information, credit information and eligibility information.

References in this Privacy and Credit Reporting Policy to "you" are references to you as an individual and/or as a company, organisation or trust as applicable.

### What is personal information?

In this Privacy Policy and Credit Reporting Policy, 'personal information' has the meaning set out in the Privacy Act. In general terms, personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information is true.

The Privacy Act provides additional protection to a category of personal information known as "sensitive information", such as information about your health or ethnicity. In general, we attempt to limit the sensitive information we collect from you, however there may be circumstances in which we may require sensitive information in order to perform our functions. Where we require sensitive information from you, we will obtain your consent to the collection of such information — except where otherwise allowed by law.

### What is credit information and credit eligibility information?

Credit Information is defined in the Privacy Act and relates to an individual's credit history, current credit arrangements, credit worthiness and credit related dealings with Zynet.

Credit eligibility information is defined in the Privacy Act and includes:

- credit reporting information provided by credit reporting bodies about an individual; and

- credit worthiness information about an individual, which we derive from credit reporting information.

### What types of personal and credit information do we collect?

The types of personal and credit information we collect about you will depend on the purpose for which the information is collected. This can include:

- in the case of customers purchasing our products and services – your name, service address, email address, telephone number(s), payment information (including credit card information or alternative payment method account information), and order details;
- if you have requested to receive news and exclusive offers, promotions, or events from us – your name, mailing or street address, email address, and telephone number(s);
- if you have contacted our customer service team to make a complaint, provide feedback, submit an enquiry, request a call-back or request support – your name, mailing or street address, email address, and telephone number(s);
- in the case of trade credit applicants – information required to assess your credit worthiness, including your credit or business history and any trade referees;
- in the case of prospective employees or contractors – information contained in your application or résumé, recorded during any interview, or obtained through any pre-employment checks, and government-issued identifiers such as tax file numbers;
- in the case of our suppliers and distributors – your name, mailing or street address, email address, bank account details and telephone number(s);
- your financial information (including nominated bank account details (including internet banking log-in details and account numbers), tax file number, transactional history (e.g. payment history and loan balances);
- payments and/or any new arrangements in respect of any defaults previously recorded with a credit reporting body and details about

court proceedings and personal insolvency information relating to you;

- whether, in the opinion of another credit provider, you have committed a serious credit infringement; and
- information about your history of making repayments in relation to other credit facilities.

We also collect technical information and general analytics, such as IP address, web browser type and browsing preferences, internet service provider, referring/exit pages, device type, operating system and date/time stamps, time zone, and geolocation data (if applicable) arising from your use of our websites.

### **How do we collect personal information and credit information?**

We may collect personal and credit information (including credit eligibility information) in number of ways, including:

- from you directly, when you sign up as a customer to purchase our products and services;
- from you directly when you contact us to ask for help or make a complaint;
- each time you visit our website;
- directly from you or from your nominated referees, if you apply for a job with us;
- from credit reporting bodies;
- through marketing and business development events;
- through credit application forms submitted to us;
- from other credit providers;
- from your representatives;
- when you sign up to receive or interact with our newsletter or our marketing communications;
- from publically available sources of information;
- from our service providers; and
- from you when you apply to work with us or are engaged by us as a contractor.

If you provide personal information about other individuals to us, you must ensure that you have informed those individuals that you are providing their personal information to us and that you have obtained their consent and advised them of our Privacy Policy.

We also use the following technologies to collect technical information and general analytics:

- cookies, which are data files that are placed on your device and often include an anonymous unique identifier. You can elect to disable cookies on your web browser;
- log files, which track actions occurring on our websites; and
- web beacons, tags, and pixels, which are electronic files used to record information about how you browse our websites.

By using our websites, you are consenting to the use of these technologies in accordance with this Privacy and Credit Reporting Policy.

### **Can you choose not to disclose your personal and credit information?**

If you contact us to make a general enquiry about our business operations, you do not have to identify yourself or provide any personal information. Alternatively, you can also notify us that you wish to deal with us using a pseudonym.

However, if we are not able to collect personal or credit information about you, we may not be able to provide you with the information or assistance you require or allow you to access our products or services. For example, we will not be able to send you information you have requested if you have not provided us with a valid email address or telephone number.

If you want, you can disable your web browser from accepting cookies and other technologies used to collect technical information and general analytics. If you do so, you can still access our websites, but it may impact your user experience.

### **The purpose for which we collect, hold, use and disclose your personal information**

In general, we use your personal and credit information for purposes connected with our business operations. Some of the specific purposes for which we may use your personal and credit information are as follows:

- to decide whether to provide or continue to provide any products or services to you on credit and to manage our relationship with you as permitted by Part IIIA of the Privacy Act;

- to provide our products and services to customers or to receive goods or services from third parties;
- to develop and improve our products, services and business;
- to assess applications for credit arrangements including checking your creditworthiness;
- to enable the proper operation and functionality of our products and services;
- to verify your identity (for example, if you request access to the personal and/or credit information we hold about you);
- to consider you for a job (whether as an employee or contractor) or other relationship with us;
- to communicate with you and to address any issues or complaints that we or you may have regarding our relationship, the services or the goods;
- to deal with management, recovery, securitisation and assignment of debts;
- to provide information to debt collection agencies for the purpose of recovering debts;
- to contact you in any way (including by mail, email, phone, in-person, text or multimedia messages) about products and services offered by us (where permitted by law);
- to notify credit providers of a default by you;
- to assess credit defaults reporting by credit reporting bodies or debt collection agencies;
- to maintain and develop business systems and infrastructure, including testing and upgrading systems;
- for direct marketing purposes (see the "Direct marketing" section below);
- to assist with your enquiries and complaints;
- to establish and maintain customer accounts and managing such relationships;
- to assist you to avoid defaulting on your credit obligations;
- to comply with laws, including assisting government agencies and law enforcement investigations; and

- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

In conducting our business operations, we may share some of your personal or credit information with third parties such as outsourced service providers or contractors. We may also use or disclose your personal or credit information for other purposes to which you have consented, or as otherwise permitted or required by law.

Technical information and general analytics is used for the purpose of assessing visitor traffic, trends and delivering personalised content to you while you are on our websites, and to improve our websites and our products and services.

#### **To whom do we disclose personal and credit information?**

We may disclose your personal and credit information to third parties in connection with the purposes described above. This may include disclosing your personal and credit information to the following types of third parties:

- our related companies;
- credit providers and credit reporting bodies, in relation to an application for credit you have made to us;
- any potential third party acquirer of our business or assets, and advisors to that third party;
- our professional advisers (such as lawyers, accountants or auditors) and insurers;
- our employees, contractors and third party service providers who assist us in performing our functions and activities e.g. payment systems operators and financial institutions, cloud service providers, data storage providers, shipping companies, telecommunications providers and IT support services providers;
- organisations authorised by us to conduct promotional, research or marketing activities;
- third party telecommunication and software providers;
- third parties to whom you have authorised us to disclose your information (e.g. referees); and

- any other person as required or permitted by law.

To enable us to assess an application by you for a credit arrangement we may:

- obtain from a credit reporting body a credit report containing credit information and personal information about you; and
- obtain a report from a credit reporting body and other information in relation to the commercial credit activities of all individuals listed in the application for credit.

We may, where you have given consent, give to, and obtain from, any credit provider named in your application for a credit arrangement and any credit provider that may be named in a credit report issued by a credit reporting body, information about your credit arrangements.

We may also disclose your credit information and personal information to credit reporting bodies in relation to credit-related dealings, for example where you have failed to meet payment obligations or commit a serious credit infringement. We may disclose your credit information to the following credit reporting bodies:

Equifax Australia  
Equifax - Customer Resolutions  
PO Box 964  
NORTH SYDNEY NSW 2059  
1300 762 207  
corrections@equifax.com.au  
[www.mycreditfile.com.au](http://www.mycreditfile.com.au)

Dun and Bradstreet  
Attn: Public Access Centre  
PO Box 7405  
ST KILDA RD VIC 3004  
1300 734 806  
pac.austral@dnb.com.au  
[www.dnb.com.au](http://www.dnb.com.au)

Experian Australia  
Attn: Credit Report  
PO Box 1969  
NORTH SYDNEY NSW 2060  
1300 783 684  
creditreport@au.experian.com  
[www.experian.com.au](http://www.experian.com.au)

The above credit reporting bodies are required to have a policy about how they manage credit-related personal information. This policy can be accessed on each credit reporting body's website or by contacting them directly.

You have the right to request that the above credit reporting bodies do not use your credit reporting information for the purposes of a pre-screening assessment in relation to direct marketing. You also have the right to request that the above credit reporting bodies do not use or disclose your credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, the victim of fraud (i.e. if you suspect someone may use your identity to apply for credit). You must contact the above credit reporting bodies directly if this is the case.

### **Direct marketing communications**

We will only send you direct marketing communications (either through mail, SMS or email), including offers any news and exclusive offers, promotions, or events, where you have consented to do so.

You may opt-out of receiving direct marketing communications at any time by contacting us or by using opt-out facilities provided in the direct marketing communications.

### **Do we disclose your personal and credit information overseas?**

We store personal information in servers located in Australia. We may disclose your personal information to overseas recipients, such as where you request us to do so (for example, so you can be contacted by a software vendor for troubleshooting) or to the extent that is necessary for a service provider who has a presence overseas to provide its products and services.

Except where an exception applies under the Privacy Act or other relevant legislation, we will take commercially reasonable steps to ensure that overseas recipients to whom we disclose personal information do not breach the Australian Privacy Principles stated in the Privacy Act in relation to such information.

### **How do we hold and protect your personal and credit information**

We strive to ensure the security, integrity and privacy of your personal information and will take reasonable precautions to protect it from misuse, loss, or unauthorised access, modification or disclosure. While we review and update our security measures in light of current technologies, the Internet is inherently insecure and we cannot guarantee the security of transmission of personal information you disclose to us online. Accordingly, you transmit your personal information to us online at your own risk.

We will endeavour to take all reasonable steps to protect the personal information you may transmit to us

or from our online products and services. Once we do receive your transmission, we will also make our best efforts to ensure its security on our systems.

Where we receive credit eligibility information, we will store and maintain those records in accordance with the Privacy Act and the CR Code.

### **How long do we keep your personal and credit information?**

Generally, we will retain your personal and credit information for the period necessary for the purposes for which your personal and credit information was collected (as outlined in this Privacy and Credit Reporting Policy) unless a longer retention period is required by law or if it is reasonably necessary for us to comply with our legal obligations, resolve a dispute or maintain security.

When personal information or credit information is no longer required, we will take reasonable steps to delete the personal information from our systems or de-identify the personal and credit information (subject to our requirements at law).

### **How can you access and correct your personal information?**

You may request access to any personal information we hold about you at any time by contacting us. Additionally, you may contact us to obtain confirmation of whether or not we hold credit eligibility information about you. We will provide access to that information in accordance with the Privacy Act, subject to any exemptions that may apply. We may charge a reasonable administration fee in limited circumstances for providing you with access to your personal information.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it by contacting us at [info@zynet.com.au](mailto:info@zynet.com.au).

We will take reasonable steps to correct any personal or credit related information that we learn is inaccurate, incomplete, irrelevant, misleading or no longer up-to-

date. This will generally occur by an individual notifying us of any change in their information, typically by contacting us using the details at the end of the policy.

### **What is the process for complaining about a breach of privacy?**

If you have any questions, concerns or complaints about our collection, use, disclosure or management of your personal information, please contact us in writing using the contact details below.

We will make enquiries and your complaint will be assessed by an appropriate person with the aim of resolving any issue in a timely and efficient manner.

If you are unsatisfied with the outcome, we will advise you about further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner.

### **Changes to this Privacy and Credit Reporting Policy**

We may change this Privacy and Credit Reporting Policy from time to time at our discretion.

Amendments to this Privacy and Credit Reporting Policy will be published on our websites. Your continued dealings with us, for example use of our websites, products or services, will signify your agreement to this Privacy and Credit Reporting Policy as amended.

### **How to contact us**

If you have a query, concern or complaint about the manner in which your personal information has been collected or handled by us or would like to request access to or correction of the personal information we hold about you, please contact using the details provided below:

<b>Attention:</b>	Zynet
<b>Email Address:</b>	<a href="mailto:Accounts@zynet.com.au">Accounts@zynet.com.au</a>
<b>Phone Number:</b>	1300 499 638

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