

# Privacy Policy - CorpCloud Pty Ltd

## **1. Privacy Policy – CorpCloud Pty Ltd**

CorpCloud Pty Ltd (ABN 45 605 224 299) and its related bodies corporate, (“we”, “us”, “our”) are committed to protecting your privacy. We are required to protect information about you (“personal information”) in accordance with the Privacy Act 1988 (Cth) (the ‘Act’). This privacy policy sets out how we collect and use your personal information.

## **2. Collecting Personal Information**

- 2.1 We will only collect your personal information using fair and lawful means. If we collect your personal information, we will take reasonable steps to inform you of the purposes for which that information is collected and held.
- 2.2 The kinds of personal information that we collect and hold include:
- (a) contact details such as your name, address, email and phone details;
  - (b) information about your employment such as your place of work and position;
  - (c) information about your needs, interests and preferences relating to our products and services, our promotions and means of communication;
  - (d) information required for you to purchase our products and services, or otherwise do business with us, including bank account details, credit check information and other financial information;
  - (e) records of your communications with us;
  - (f) information regarding your access and use of our products and services, including IP addresses, your service history and your account payment history

## **3. How is Personal Information Collected?**

- 3.1 We collect personal information when you:
- (a) request data sheets or information about our products and services;
  - (b) interact with our websites;
  - (c) place an order for our products or services;
  - (d) apply for employment with us;
  - (e) request customer service or support;
  - (f) apply for credit with us;
  - (g) respond to surveys, research and marketing activities conducted by or for us; and
  - (h) visit our facilities.
- 3.2 If you cannot provide us with information that we request we may not be able to fulfill the purpose of collection, such as to supply products and services to you, or to assess your application for employment.

- 3.3 Where practicable, we will collect personal information directly from you. If we receive information about you from someone else (for example from someone who supplies goods or services to us), we will take reasonable steps to ensure that you are aware that we have collected personal information about you, and the circumstances of that collection.

#### **4. Purposes of collection, holding and use of personal information**

- 4.1 We collect, hold and use personal information where it is reasonably necessary for one or more of our functions or activities, including to:

- (a) verify or establish your identity;
- (b) offer relevant products and services to you;
- (c) provide products and services to you;
- (d) obtain products and services from our suppliers;
- (e) respond to enquiries regarding our products and services;
- (f) process and assess employment applications;
- (g) conduct credit checks;
- (h) undertake research and surveys and analyse information;
- (i) inform you of ways in which our products and services may be improved;
- (j) conduct promotions and competitions; and
- (k) comply with our legislative and regulatory obligations.

#### **5. Disclosure**

- 5.1 In carrying out our business, it may be necessary to share your personal information with third parties, including third party suppliers and contractors. These third parties may be based in Australia or overseas. We will take reasonable steps to ensure that those third parties are bound to protect the confidentiality and privacy of your personal information.

- 5.2 We will not disclose your personal information to third parties unless:

- (a) it is necessary to provide you with a product or service requested by you;
- (b) having regard to the nature of the information or the circumstances of collection, you would reasonably expect us to make the disclosure;
- (c) we are required or authorised by government, regulatory authorities, law, or a court or tribunal;
- (d) it is necessary to protect the rights, property, health, or personal safety of any of our customers, any member of the public or our interests, and it is unreasonable or impractical to obtain your consent;
- (e) the disclosure is necessary to assist any entity, body or person to locate a person who has been reported missing;
- (f) we reasonably believe it is necessary to deal with actual or suspected unlawful activity or misconduct of a serious nature;
- (g) the assets and operations of our business are transferred to another person; or
- (h) you have provided your explicit, informed consent.

## **6. Direct Marketing**

- 6.1 Your personal information may be used from time to time for the purposes of communicating marketing material to you.
- 6.2 If you no longer wish to receive marketing material from us, please contact us via the contact details below, requesting to be removed from our mailing lists. You may also use the unsubscribe facilities that may be included in electronic communications.

## **7. Online Privacy Practices**

- 7.1 When interacting with our websites or other web-based solutions, certain technologies may collect information about your visit as necessary to facilitate online transactions. These technologies include the use of cookies, being pieces of information used by a website for record keeping purposes. Most web browsers are set by default to accept cookies. Cookies are useful to estimate the number of website visitors and to determine traffic patterns on our websites.
- 7.2 If you do not wish to receive cookies, you may alter your browser's configuration to refuse cookies. This may mean that you will not be able to use all of our online services.
- 7.3 Our websites may contain links to third party websites. We do not control these linked websites, and we are not responsible for the content of those websites or the collection or use of personal information by the persons who control those websites. Before providing any personal information on any linked website, we recommend that you examine the terms and conditions and privacy policy applicable to that website.

## **8. Data quality**

- 8.1 We will take reasonable steps to ensure that personal information held by us is accurate, complete and up to date. However, our ability to do so depends on the information and feedback that you provide to us. Please contact us at the contact details below if you become aware of any error in your personal information held by us, and to inform us of any changes to your personal information.
- 8.2 We will also take reasonable steps to protect any personal information on our networks and information processing facilities from misuse, loss, unauthorised access, modification or disclosure.
- 8.3 Any personal information that is no longer required will be destroyed using appropriate document or data destruction methods.
- 8.4 Where destruction is not appropriate, this information will be changed or aggregated for statistical purposes and handled in such a way that you can no longer be identified.

## **9. Requesting access to personal information**

- 9.1 If you want to know what personal information we hold about you, you may contact us via our contact details below. We will endeavour to provide you with details of your personal information held by us within 30 days of receiving your request.

- 9.2 In some circumstances, we may deny you access to your personal information held by us, including if:
- (a) we reasonably believe that giving access would pose a serious threat to the life, health or safety of any person, or to public health or public safety;
  - (b) providing access would have an unreasonable impact on the privacy of another person;
  - (c) the request is frivolous or vexatious;
  - (d) the information relates to existing or anticipated legal proceedings between you and us, and the information would not be accessible via discovery in those proceedings;
  - (e) providing access would prejudice our negotiations with you or a third party;
  - (f) we reasonably believe that granting access would prejudice our ability to deal with actual or suspected unlawful activity or misconduct of a serious nature;
  - (g) providing access would be unlawful or contrary to Australian law or an order of a court or tribunal;
  - (h) giving access would be likely to prejudice law enforcement activities; or
  - (i) giving access would reveal information in connection with a commercially sensitive decision-making process.
- 9.3 If at any time you wish to amend personal information that we hold about you because it is inaccurate or out of date, please contact us at the contact details below and we will amend that information in a timely manner.
- 9.4 If you wish to have your personal information deleted, please contact us at the contact details below and we will take reasonable steps to delete it unless we need to keep it for legal reasons.

## **10. Storage & Security of Personal Information**

- 10.1 We require our employees and any data processors to respect the confidentiality and privacy of your personal information.
- 10.2 We require unattended user equipment within our business to have appropriate protection to prevent unauthorised access, compromise, or theft of information and information processing facilities.
- 10.3 When we no longer need to use your personal information for the purposes for which it was collected, we will take steps to de-identify or destroy it.
- 10.4 We will use appropriate disposal methods will when destroying your personal information to prevent, where reasonably possible, unauthorised persons from having access to that information. Disposal methods include but are not limited to secure shredding, multiple passes of digital media upon deletion, and other appropriate disposal techniques appropriate to the classification level of your information.

## **11. Complaints Handling**

- 11.1 If you have any concerns or complaints about how we handle your personal information, or if you have any questions about this privacy policy, please contact us in writing at the contact details below.
- 11.2 We will investigate your complaint and will endeavour to respond in writing within 30 days of receiving that complaint.
- 11.3 If we fail to respond to your written complaint within 30 days of receiving it or if you are dissatisfied with our response, you may have the right to make a complaint to the Office of the Australian Information Commissioner or an applicable regulatory authority.

## **12. Contact**

- 12.1 If you have questions relating to this policy, wish to access the personal information we hold about you, or have a comment or complaint regarding our personal information management policies or activities or compliance with the Act, please contact us at:

Privacy Officer  
CorpCloud Pty Ltd  
32 Harrogate Street,  
West Leederville, WA 6007  
Australia  
T: (08) 6243 0700  
[privacy@corpcloud.com.au](mailto:privacy@corpcloud.com.au)

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