

## Privacy Policy

### 1. About this Privacy Policy

- 1.1 LBN Co Pty Ltd ACN 073 226 114 (referred to as **LBNC Co, we, us** or **our**) has implemented this Privacy Policy to provide information about what kinds of Personal Information we may collect or hold, how we collect, hold, use and disclose that Personal Information, choices you have regarding our use of that Personal Information, and your ability to access or correct that Personal Information. If you wish to make any inquiries regarding this Privacy Policy, you should contact our Privacy Officer in any of the ways specified in paragraph 15.
- 1.2 From time to time, **LBNC Co** may be related to other companies and entities (**Related Entities**). This Privacy Policy applies to the use of your Personal Information by us and by those Related Entities. Those Related Entities may also have their own privacy policies which set out additional detail or differences in their privacy practices. To the extent that those privacy policies are inconsistent with this Privacy Policy, those privacy policies will prevail over this Privacy Policy in relation to the actions of those Related Entities. A reference in this Privacy Policy to **LBNC Co, we, us** or **our** is also a reference to those Related Entities.

### 2. Personal Information

- 2.1 "**Personal Information**" is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable.

### 3. What Personal Information do we collect and hold?

- 3.1 The types of Personal Information we may collect about an individual will depend upon the nature of our interaction with them. Personal Information that we collect may include (but is not limited to) the following:
  - (a) name
  - (b) gender
  - (c) age and/or date of birth
  - (d) contact details including telephone numbers (landline and/or mobile)
  - (e) current address (including postal address)
  - (f) email address
  - (g) payment details, such as your credit card or bank account details
  - (h) occupation and employment details including employment status and any previous work experience
  - (i) information from or in connection with your resume or job application if you apply for a position with us
  - (j) visa details
  - (k) geographical location
  - (l) IP address, and
  - (m) Australian Business Number (ABN).
- 3.2 We collect and record Personal Information about individuals such as:
  - (a) our customers, potential customers and their representatives
  - (b) our suppliers and potential suppliers and their representatives, directors, partners, proprietors and shareholders
  - (c) contractors and subcontractors and potential contractors and subcontractors and their representatives in relation to providing goods and services to us
  - (d) our employees past and present, including applicants, and

- (e) any other person who comes into contact with LBNC Co.

#### 4. How and when do we collect Personal Information?

- 4.1 We collect your Personal Information to allow us to conduct our business functions, to provide, market and sell our products and services and for the specified purposes set out in paragraph 6. In some circumstances the collection of Personal Information may be required by law.
- 4.2 We may collect your Personal Information in the course of providing you with goods or services, or:
- (a) when you use or buy our products or services, or products and services provided by one of our retail service providers
  - (b) when you provide us, or you offer or apply to supply us, with goods or services
  - (c) when you provide information to us in any way (including by completing a form, disclosing information over the phone or via email, or providing us a business card)
  - (d) when you request information about us, our products or our services
  - (e) when you provide feedback to us
  - (f) when you visit premises from which we operate or when we are required to visit your residence for the purposes of providing services to you
  - (g) when you (or your employer) provide that information to us in the course of conducting or administering our relationship with you, or when you are carrying out activities in connection with our business operations
  - (h) when you submit a job application to us
  - (i) when you log a ticket online at [www.lbnco.com.au](http://www.lbnco.com.au) (our **Website**) (see paragraph 5)
  - (j) when you otherwise contact us by telephone, fax, email, social media, post or in person, or
  - (k) where we are otherwise required or authorised by law to do so.
- 4.3 Generally, when providing our products and services, dealing with our personnel, or obtaining goods and services from our service providers, suppliers or contractors, we collect personal information directly from the relevant individual where reasonable and practicable.
- 4.4 We may also collect Personal Information about you from third parties and other sources such as:
- (a) our retail service providers
  - (b) the strata management company for the building in which you reside
  - (c) your nominated representatives
  - (d) publicly available sources of information, or
  - (e) related entities, companies and businesses of LBNC Co,
- but we will only collect your Personal Information in this way if it is unreasonable or impracticable to collect this information directly from you or if we are otherwise permitted to do so.
- 4.5 If the Personal Information we collect includes sensitive information, including health information and biometric information, we will ask for your consent to collect sensitive information, unless the law allows us to collect it without your consent.
- 4.6 Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.
- 4.7 If you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, or if we do not or are unable to collect the Personal Information we require,

we may not be able to provide you with requested information, products or services, or to effectively conduct our relationship with you.

## **5. Information collected via our Website**

- 5.1 We will only collect Personal Information about users of our Website when they submit such information by logging a ticket on our Website. We will not use any other methods (such as Cookies, Web Beacons or Google Analytics) to collect your Personal Information when you use our Website.

## **6. How do we use your Personal Information?**

- 6.1 We use the Personal Information we collect about you for our business functions and activities, in order to operate our business efficiently, and to market our products and services for the benefit of our customers.

- 6.2 We may collect, hold and use your personal information:

- (a) to identify and communicate with you
- (b) to enable us to provide you with requested information, products or services
- (c) to otherwise assist customers by providing them with information and support
- (d) to collect and process payments
- (e) to help us to manage, maintain and enhance products or services we provide to you or to our retail service providers
- (f) to help us to manage, maintain and enhance goods and services we procure from our suppliers and subcontractors
- (g) to manage and administer any account you may hold with us
- (h) to promote and market our products and services to you
- (i) to provide you with information that we believe may be of interest to you or that you may be interested in receiving, including advertising material, regarding us, our clients, and our business partners
- (j) to protect you and us from fraud
- (k) to provide for the safety and security of workers and onsite visitors
- (l) to help us manage our business operations
- (m) for business support purposes including maintenance, backup and audit
- (n) to process any job application submitted by you
- (o) to respond to any queries or complaints you may have, or
- (p) to comply with our statutory and legal obligations.

- 6.3 We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law, but we have no obligation to monitor the use of the Website or to retain the content of any user session.

- 6.4 You consent to us using your Personal Information in the above ways and as set out in this Privacy Policy.

- 6.5 We may otherwise collect, use or disclose your Personal Information where the collection, use or disclosure is:

- (a) in accordance with this Privacy Policy or any agreement you enter into with us, or
- (b) required or authorised by law, including without limitation the Australian Privacy Principles under the *Privacy Act 1988 (Cth)*.

## **7. When do we disclose your Personal Information?**

- 7.1 LBNC Co may disclose, or provide access to, your Personal Information to third parties in connection with the purposes described in paragraph 6.1. Depending on the circumstances and the nature of your engagement with us, we may disclose your Personal Information to

our related entities, to third parties that provide products and services to us or through us, or to other third parties (such as your referee(s) in connection with a job application you have submitted).

7.2 We may also disclose your Personal Information to:

- (a) any of LBNCo's internal divisions, business units or departments
- (b) our retail service providers
- (c) the strata management company for the building in which you reside
- (d) your nominated representatives
- (e) other organisations or individuals who assist us in providing products and services to you
- (f) professional service providers and advisors who perform functions on our behalf, such as lawyers
- (g) medical providers including medical and rehabilitation practitioners for assessing insurance claims
- (h) representatives, agents or contractors who are appointed by us in the ordinary operation of our business to assist us in providing goods or services or administering our business (such as for data storage or processing, printing, mailing, marketing, planning and product or service development)
- (i) banks, mortgage insurers, leaders, valuers, real estate agents (referees), insurers, brokers, auditors, business consultants and IT service providers, and
- (j) Government, regulatory authorities and other organisations as required or authorised by law (such as Centrelink or the Police).

7.3 We may also disclose your Personal Information to our software application providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner.

7.4 We may also disclose your Personal Information to a purchaser or potential purchaser in connection with the sale or potential sale of LBNCo, our business or any of our assets, including in insolvency, in circumstances which require the purchaser or potential purchaser to use such Personal Information consistently with this Privacy Policy.

## **8. Overseas disclosures**

8.1 Generally, we do not send or disclose your Personal Information to overseas recipients. However, some of your Personal Information may be disclosed, transferred, stored, processed or used overseas by us, or by third party service providers. This may happen if:

- (a) we outsource certain activities overseas
- (b) transactions, information, services or products have an overseas connection, or
- (c) our computer systems including IT servers are located overseas.

8.2 You consent to the collection, use, storage, and processing of your Personal Information outside of Australia as set out in this Privacy Policy.

## **9. Other uses and disclosures**

9.1 We may collect, use and disclose your Personal Information for other purposes not listed in this Privacy Policy. If we do so, we will make it known to you at the time we collect or use your Personal Information.

## **10. Marketing**

10.1 We will not use your Personal Information for Direct Marketing purposes.

## **11. Storage and security of Personal Information held by us**

- 11.1 We aim to keep your Personal Information secure. Any Personal Information that is collected via our Website or which is held on our computer systems is protected by safeguards including physical, technical (firewalls, SSL encryption etc.) and procedural methods.
- 11.2 We do not collect sensitive or financial information about our users via our Website.
- 11.3 If we find that we no longer require or have no further need for your Personal Information we may de-identify it or remove it from our systems and destroy all record of it.

## **12. You can access and update your Personal Information**

- 12.1 You are generally entitled to access Personal Information that we hold about you. If you request access to your Personal Information, in ordinary circumstances we will give you full access to your Personal Information. Depending on the nature of the request, **LBNC** may charge for providing access to this information, however such charge will not be excessive. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal where we are required by law to give those reasons.
- 12.2 A request for access can be made by contacting our Privacy Officer in any of the ways specified in paragraph 15.
- 12.3 We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete.
- 12.4 Please contact us in any of the ways specified in paragraph 15 if you believe that the Personal Information is inaccurate, incomplete or out of date, and we will use all reasonable efforts to correct the information.
- 12.5 It would assist us to ensure we properly understand your request, and allow us to respond more promptly, if requests are made in writing and include as much detail as possible.

## **13. How do we deal with complaints about privacy?**

- 13.1 If you feel that we have not respected your privacy or that we have conducted ourselves inconsistently with this Privacy Policy, please contact our Privacy Officer in any of the ways specified in paragraph 15 and advise us as soon as possible. We will investigate your queries and privacy complaints within a reasonable period of time depending on the complexity of the complaint.
- 13.2 It would assist us to respond to your complaint promptly if it is made in writing. Please detail information relevant to your complaint.
- 13.3 We will notify you of the outcome of our investigation.

## **14. Updates to this Privacy Policy**

- 14.1 We may, from time to time, review and update this Privacy Policy, including to take into account new laws, regulations, practices and technology. All Personal Information held by us will be governed by our most recent Privacy Policy. Any changes to this Privacy Policy may be advised to you by updating our Website.

**15. What to do if you have a question, problem or want to contact us about our use of your Personal Information or this Privacy Policy**

15.1 If you:

- (a) have a query or concern about this Privacy Policy or our Personal Information handling processes
- (b) wish to make a complaint in relation to a breach of your privacy
- (c) would like to access your Personal Information held by us
- (d) would like to update or correct your Personal Information held by us, or

(e) would like to opt out of direct marketing,  
please contact our Privacy Officer in any of the following ways:

- » Email Address: info@lbnco.com.au
- » Mailing Address: PO Box 557 Gladesville 1675or
- » Phone: 1300 797 027

This Privacy Policy was last updated on 14 September 2018.