

# Privacy Policy

## Your privacy is important

This Privacy Policy outlines how REDARC Electronics Pty Ltd (ACN 099 971 794) as trustee for the REDARC Trust, trading as Hummingbird Electronics (**REDARC, us or we**) collects, uses and discloses personal information as required by the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**) and the credit reporting provisions contained in Part IIIA of the Privacy Act.

## The kinds of personal information we collect and hold

We collect and hold personal information about customers, job applicants, staff members, contractors and other people who come into contact with us (**you**).

Without limitation, the kinds of personal information we collect and hold may include your name, address and other contact details, which of our products you have purchased, credit and debit card details and information obtained when you use our website, including which of our pages you have accessed.

If we provide you (or an entity related to you) with credit, we may also collect and hold credit information and credit eligibility information about you. Without limitation, this may include credit reports, identification information, consumer credit liability information, details of amounts payable to us, default information and payment information.

## Manner and purpose of collection of personal information

We will generally collect personal information (including the types of credit-related personal information referred to above) (**personal information**) about you directly by way of forms and other documents provided to us by you (including via the internet), correspondence you provide to us and discussions with you.

Occasionally, we may collect personal information about you from third parties. For example, we may collect personal information about you from an entity related to you or credit eligibility information about you from credit reporting bodies (**CRBs**) if we provide you (or an entity related to you with credit).

We will only collect, hold and use personal information for the following purposes unless otherwise required or permitted by law:

- to provide you with the best possible service in supplying you with goods and services offered by us;
- [information within communications from you via emails and live chats](#);
- [publicly available information from your social media interactions with us or posts about us](#);
- [Information through your smart device's Bluetooth or Wi-Fi connection when you visit our stores - such as your location](#)
- to provide you with marketing materials in relation to offers, specials, products and services we have available from time to time or our functions and activities via any medium including mail, telephone and email;
- if you are a job-applicant or a potential contractor, to assess your suitability and (if successful) engage you and to assist with administering your employment or contract;
- if we are providing you (or an entity related to you) with credit, to assess your creditworthiness (or the creditworthiness of your related entity which is receiving the credit);
- for our internal management purposes, to manage our relationship with you and to manage the payment and recovery of amounts payable to us by you;
- [Information from your connected REDARC products – products that are “intelligent” or “smart”, internet enabled or operated through a RedVision app \(see the Connected Products page for information specific to your product\); and](#)
- for other purposes which are reasonably necessary in connection with our ordinary functions and activities.

If we are unable to collect personal information relating to you, we may be unable to provide the credit, goods or services you require (or that an entity related to you requires) or continue our relationship with you (or any entity related to you).

## Disclosure of your personal information

We may disclose personal information about you to the following types of entities if required in connection with the purposes listed above:

- our contractors, consultants, advisers, associates and related entities;
- any industry body, tribunal, court or otherwise in connection with any complaint made by you about us;
- if we are providing you (or an entity related to you) with credit, CRBs, trade insurers and businesses assisting us with providing credit;
- if you have provided us with referees to assist with a credit application, a job application or the assessment of a potential contract between you and us, the referees you have provided; and
- other entities with your consent or as permitted or required by law.

We are unlikely to disclose your personal information to overseas recipients.

If you fail to make a payment to us as and when due or commit a serious credit infringement we may disclose details of such events to CRBs. A CRB may use such information in reports given to other credit providers to help assess your creditworthiness. You have certain rights to request that CRBs do not use or disclose credit reporting information about you if you believe on reasonable grounds you have been or are likely to be a victim of fraud. You should contact each relevant CRB directly if you wish to request this.

The CRBs we deal with include Veda Advantage (<http://www.veda.com.au/>) and Dun and Bradstreet (<http://dnb.com.au/>). Copies of their privacy policies dealing with how they manage credit-related personal information can be found on their websites.

## How we hold personal information

We hold personal information in paper form and electronic form. We have in place steps to protect the information we hold from misuse, interference and loss and from unauthorised access, modification or disclosure.

## How to obtain access to your personal information

You may obtain access to personal information which we hold about you by contacting us using the contact details set out below. When you request copies of your personal information held by us we will endeavour to provide you with such personal information as soon as reasonably practicable.

If you request access to your personal information, we may require you to verify your identity and specify what information you require. There may be occasions when access to personal information we hold about you is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others.

## Accuracy and completeness of personal information

While we will endeavour to ensure that the personal information collected from you is up to date, accurate and complete, we will assume that any personal information provided by you is free from errors and omissions. You may request that we update or vary personal information that we hold about you using the contact details set out below.

## How to make a complaint about a breach of your privacy rights

If you are of the view we have breached the APPs, the Privacy Act, or any related privacy code in dealing with your personal information, you may make a complaint by writing to us using the contact details set out below and we will

endeavour to provide you with confirmation as to how we propose to deal with the complaint as soon as reasonably practicable.

If you are not satisfied with our response to your complaint, you may make a complaint to the Privacy Commissioner.

### **Direct marketing communications**

From time to time we may use your personal information to provide you with marketing materials in relation to offers, specials, products and services that we have available. If you would not like to receive direct marketing materials from us you may notify us using the contact details set out [below](#) or by [following the unsubscribe link in the email footer which will permanently remove you from that mailing list](#).

If requested by us, a CRB may use credit reporting information about you to assess whether you may be eligible to receive direct marketing communications from us (i.e. pre-screening). You have the right to request that CRBs do not use credit reporting information about you for this purpose. You should contact each relevant CRB directly if you wish to request this.

### **Cookies**

A cookie is a data file that a website transfers to your computer. Cookies fall into two general categories; 1<sup>st</sup> party cookies (set by REDARC) and 3<sup>rd</sup> party cookies set by others.

**First party cookies:** These are set by REDARC and are used to improve the functionality of the website. They provide feedback to us on how our customers use our website and we use this information to continuously improve our online experience and resources.

**Third party cookies:** these are set by other parties with whom we work. These could be, but not limited to online questionnaires, live chatbots and some advertising networks. These cookies cannot read data on your computer and you can manage cookies if you don't want to be tracked.

**Social media cookies:** some pages on our website may share pages with social media sites like LinkedIn, Facebook and Twitter. Sometimes we may embed videos from our channel on YouTube. These sites set their own cookies which we don't control. These sites will also have their own cookie policies.

### **Anonymity and pseudonyms**

You have the option of not identifying yourself or using a pseudonym when dealing with us unless we are required by law or a court/tribunal to deal with individuals who have identified themselves or it is impractical for us to deal with you if you have not identified yourself.

### **Variation of policy**

We may vary the terms of this Privacy Policy from time to time to take account of new laws and technology, changes to our functions and activities and to make sure it remains appropriate.

### **Contact details**

Please direct all complaints and queries in relation to your privacy to: Privacy Officer, REDARC Electronics Pty Ltd, 23 Brodie Road north, Lonsdale SA 5160, (e-mail address: [power@REDARC.com.au](mailto:power@REDARC.com.au)).