

Privacy policy

Last updated March 2016

Sealanes (1985) Pty Ltd (ACN 009 121 331) and its Related Bodies
Corporate (**Sealanes**).

In this Privacy Policy, the expressions “**Sealanes**”, “we”, “us” and “our” are a reference to Sealanes (1985) Pty Ltd (ACN 009 121 331) and its Related Bodies Corporate (as defined by the provisions of the *Corporations Act 2001* (Cth)).

This Privacy Policy applies to personal information collected by us. We are bound by the Australian Privacy Principles and the *Privacy Act 1988* (Cth), which govern the way private sector organisations collect, use, keep secure and disclose personal information.

The purpose of this Privacy Policy is to generally inform people of:

how and when we collect personal information;

how we use and disclose personal information;

how we keep personal information secure, accurate and up-to-date;

how an individual can access and correct their personal information; and

how we will facilitate or resolve a privacy complaint.

If you have any concerns or complaints about the manner in which your personal information has been collected, used or disclosed by us, we have put in place an effective mechanism and procedure for you to contact us so that we can attempt to resolve the issue or complaint. Please see **Section 12** for further details.

If you have any concerns or questions, please contact us and our privacy officer at feedback@sealanes.com.au or write to us at PO Box 685, South Fremantle, Western Australia, 6958 and our privacy officer will then attempt to resolve the issue.

We recommend that you keep this information for future reference.

What is personal information?

The *Privacy Act 1988* (Cth) defines “personal information” to mean any information or an opinion about an identified individual, or an individual who is reasonably identifiable:

whether the information or opinion is true or not; and

whether the information or opinion is recorded in a material form or not.

The kinds of personal information collected, used and disclosed by Sealanes

We will only use or disclose your personal information for the primary purposes for which it was collected or as consented to by you.

At or around the time we collect personal information from you, we will endeavour to provide you with a notice which details how we will use and disclose that specific information.

We set out some common collection, use and disclosure instances in the table below.

Purpose	Type of Information	Uses
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Account application / Sales	<ul style="list-style-type: none"> • Contact and identifying information: Such as your name, company name, address, billing address (if different to address), email address, phone numbers. Alternative Contact (name, address and phone number). Details of required primary identification information if an individual (such as a current Australian drivers licence, Medicare card, passport, birth certificate, etc). • Credit information: Such as your bank account (including bank statements), credit or debit card details. Occupation and employment details for individuals (including, if applicable, pay slips). Guarantor contact details, if applicable. Information relating to your credit history. 	<p>For full details relating to uses of personal information in relation to the use of credit information, please refer to our Credit Reporting Policy.</p> <ul style="list-style-type: none"> • Vendor and Supplier payments: The processing of any payments and refunds, if applicable. • Identity verification: if required, the verification of your identity. • Services: the provision of our services to you including: Using your personal information in order for you to use the products and services offered. Payment processing. Checks for financial standing and credit-worthiness as detailed in our Credit Reporting Policy. To provide customer service functions, including handling customer enquiries and complaints. • Online accounts: If you provide us your personal information to apply to create an online account, we will use it for: Adding account holders to the marketing database. Processing of account transactions and order management. Customer service related contact. To protect Sealanes' websites from security threats, fraud or other criminal activities. The use for the administration of Sealanes. The maintenance and development of our products, services and infrastructure. In connection with the sale of any part of Sealanes business or a company owned by a Sealanes related entity. To provide customer services.
General Enquiries / Online Access Requests	<ul style="list-style-type: none"> • Phone or face-to-face enquiries: Contact information necessary to address your enquiry or complete any requests, such as your name, email address, company if applicable, current postal and residential addresses, phone numbers, country of residence. • Website enquiries: Such as your name, email address, phone number so that we may respond to your enquiry, as well as any information you provide to us. • Online Access Requests: Information such as: User account information such as username and password and other contact information. Any other information provided to Sealanes by you in order to complete your online access request. • Enquiries via social media: Including account name, "likes", comments posted on our social media pages, any of your oppositions or feedback, photos posted or uploaded to our social media pages, and other information pertaining to your social media activities which concern, or relate, to Sealanes, including any personal information contained in the content of any messages you send directly to us via social media. 	<p>The types of uses we will make of personal information collected for this type of purpose include:</p> <ul style="list-style-type: none"> • Identity verification: if required, the verification of your identity. • Services: using your personal information in order to assist you to use the products and services offered. • Marketing: using your personal information for the purposes set out in "Newsletter / Marketing Strategy" section below. • General administrative and security use: The use for the administration and management of Sealanes. The maintenance and development of our products, services, business systems and infrastructure. In connection with the sale of any part of Sealanes business or a company owned by a Sealanes related entity. To provide customer services to clients and for assurance purposes. • Social media: If you participate in our social media platforms (such as Facebook) and you provide personal information, we will use it for: Adding account holders to the marketing database. Customer service related contact. Responding to social media messages. Fulfilling social media platform rules.

Newsletters/ Marketing Services	<ul style="list-style-type: none"> • Subscription request: Information submitted with your request to subscribe to our newsletter or receive our catalogues, such as your name, email address, current postal and residential addresses, phone numbers, country of residence. • Marketing enquiries: Such as your name, email address, phone number and any information you provide to us as part of your message. • Social media activity: Including account name and other publicly available account information, “likes”, comments posted on our social media pages, any of your oppositions or feedback, photos posted or uploaded to our social media pages, and other information pertaining to your social media activities which concern, or relate, to Sealanes. 	<ul style="list-style-type: none"> • Identity verification: if required, the verification of your identity. • General marketing and consumer analytics: To aggregate with other information and to the extent necessary for marketing and consumer analytics. To offer you updates on products, events or information that may be of interest to you. Form and promotional activities by us (including direct mail, telemarketing, post and email) such as our email alerts, product awareness information and newsletters. • Social media: If you participate in our social media platforms (such as Facebook and Twitter) and you provide us your personal information, we will use it for: Adding account holders to the marketing database. Responding to social media messages. Fulfilling social media platform rules.
Competitions	<ul style="list-style-type: none"> • Contact information: Such as your name, email address, current postal and residential addresses, phone numbers, country of residence (and, if applicable, age). • Social media activity: Including “likes”, comments posted, any of your oppositions or feedback, photos posted or uploaded and other information pertaining to your social media activities which concern, or relate, to the relevant competition to which you submit an entry. • Content of entry: Any personal information contained in your competition entry or otherwise specifically requested in order to submit your entry in the relevant competition. 	<ul style="list-style-type: none"> • Competition: to display your entry on our website, social media pages, and to contact you should you become a finalist and/or win any of the competitions you enter. • General marketing and consumer analytics: To aggregate with other information and to the extent necessary for marketing and consumer analytics. To offer you updates on products, events or information that may be of interest to you. For Marketing and promotional activities by us (including by direct mail, telemarketing and email) such as our email alerts, product awareness information and newsletters. • Social media: If you participate in competitions on social media platforms and you provide us your personal information, we will use it for: Adding account holders to the marketing database. Customer service related contact. Responding to social media messages. Fulfilling social media platform rules.
Human resources	<ul style="list-style-type: none"> • Contact information: Such as name, e-mail address, current postal and residential address, phone numbers, country of residence, next of kin contact details for emergencies. • Employee record information including personal information contained within our employee records if you have previously been employed by us, and any employee records obtained from your previous employers and provided by you as part of your application. • CV, resume or application related information. • Tax, superannuation and payroll information: Such as your Tax File Number and ATO Declaration, Superannuation details and financial institution details. • Background check information: Information obtained from you or third parties to perform background checks. • Medical or health information which you voluntarily provide to us as part of pre-employment medicals, health disclosure, random drug and alcohol testing or such other information which may be related to an incident which has occurred during the course of your employment. • Information collected from referees • Security information: Such as CCTV footage and photographs taken on our premises. 	<ul style="list-style-type: none"> • Background checks: Utilising the information collected for the purpose of assessing candidate suitability for role. • Administration and performance monitoring: Utilising the information collected for the purpose of: Dealings related to the employer/employee relationship or the contractor/principal relationship (as may be). Use of such information whether or not the relationship or contractor relationship is prospective, current or past. Use of such information to monitor systems, performance and time usage and internet usage. The use of your personal information collected for the administration and management of Sealanes. In connection with the sale of any part of Sealanes business or a company owned by a related entity.

Customer Surveys

- **Contact information:** Such as your name, email address, current postal and residential addresses, phone numbers, (and, if applicable, country of residence and age).
- **Content of survey:** Any personal information contained in the survey as completed by you.
- **Consumer analytics:** using your personal information To aggregate with other information and to the for consumer analytics. To gauge compliance with our quality assurance policies.

How Sealanes collects and holds personal information

Collection generally

As much as possible or unless provided otherwise in this Privacy Policy or a notification, we will collect your personal information directly from you.

When you engage in certain activities, such as filling out a survey or sending us feedback, we may ask you to provide certain information. It is completely optional for you to engage in these activities.

Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory information or any other information we require in order for us to provide our products or services to you, we may be unable to provide our products or services to you in an effective manner, or at all, and we may be unable to address any of your enquiries.

Other collection types

We may also collect personal information about you from other sources, such as competitions where we partner with other companies to collect entries. In other circumstances, however, we generally don't collect personal information from third parties.

In some circumstances, we may collect personal information about you from publically available sources including but not limited to, court judgments, directorship and bankruptcy searches, Australia Post, White Pages directory, and social media platforms (such as Facebook, Twitter, Google, Instagram, etc).

Notification of collection

If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and why, unless special circumstances apply, including as described in this clause 3.3(a) to 3.3(c) below. Generally speaking, we will not tell you when we collect personal information about you in the following circumstances:

where information is collected from any personal referee you have listed on any application form (including any employment application) with Sealanes;

where information is collected from publically available sources including but not limited to court judgments, directorship and bankruptcy searches, social media platforms (such as Facebook, Twitter, Google, Instagram etc); or

as otherwise required or authorised by law.

Unsolicited personal information

In the event we collect personal information from you, or a third party, in circumstances where we have not requested or solicited that information (known as unsolicited information), and it is determined by Sealanes (in its absolute discretion) that the personal information is not required, we will destroy the information or ensure that the information is de-identified.

In the event that the unsolicited personal information collected is in relation to potential future employment with Sealanes, such as your CV, resume or candidacy related information, and it is determined by Sealanes (in its absolute discretion) that it may consider you for potential future employment, Sealanes may keep the personal information on its human resource records.

How we hold your personal information

Once we collect your personal information, we will hold it securely and store it on infrastructure owned or controlled by us. We provide some more general information on our security measures in **Section 10 (Data security and quality)**.

Cookies and IP addresses

If you use our website, we may utilise "cookies" which enable us to monitor traffic patterns, trends and to serve you more efficiently if you revisit our website. In most cases, a cookie does not identify you personally but may identify your internet service provider or computer.

We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

However, in some cases, cookies may enable us to aggregate certain information with other personal information we collect and hold about you. Sealanes extends the same privacy protection to your personal information, whether gathered via cookies or from other sources, as detailed in this Privacy Policy.

You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance. However, if you disable cookies, you may not be able to access certain areas of our websites or take advantage of the improved web site experience that cookies offer.

Uses and discloses of personal information

Use and disclose details

We provide a detailed list at **Section 2** of some common uses and disclosures we make regarding the personal information we collect.

Other uses and disclosures

We may also use or disclose your personal information and in doing so we are not required to seek your additional consent:

when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose;

if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;

if we have reason to suspect that unlawful activity has been, or is being, engaged in; or

if it is required or authorised by law.

Use and disclosure procedures

In the event we propose to use or disclose such personal information other than for reasons set out in the above table at **Section 2** or as otherwise outlined in this Privacy Policy, we will first notify you or seek your consent prior to such disclosure or use.

Your personal information is disclosed to these organisations or parties only in relation to the products or services we provide to you or for a purpose permitted by this Privacy Policy.

We take such steps as are reasonable to ensure that these organisations or parties are aware of the provisions of this Privacy Policy in relation to your personal information.

Communications opt-out

If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact us via the details set out at the top of this document and we will ensure the relevant communication ceases. Any other use or disclosure we make of your personal information will only be as required or authorised by law or as permitted by this Privacy Policy or otherwise with your consent.

Sensitive information

Sensitive information generally

Sensitive information is a subset of personal information. It means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

Collection and use of sensitive information

In general, we attempt to limit the collection of sensitive information we may collect from you, but depending on the uses you make of our products this may not always be possible and we may collect sensitive information from you in order to carry out the services provided to you. However, we do not collect sensitive information from you without your consent.

The type of sensitive information we may collect about you is dependent on the services provided to you by Sealanes, and will be limited to the purpose(s) for which it

is collected. We set out some types of sensitive information we may collect about you in the “*Human resources*” section of the table at **Section 2** above.

We do not use sensitive information to send you Direct Marketing Communications (as set out in **Section 6** below) without your express consent.

Consent

We may collect other types of sensitive information where you have consented and agree to the collection of such information. Generally speaking, we will obtain this type of consent from you at (or around) the point in time in which we collect the information.

Direct Marketing

Express informed consent

You give your express and informed consent to us using your personal information set out in:

the “*General Enquiries / Online Access*” section of the table at **Section 2** of this document above;

the “*Newsletters / Marketing Services*” section of the table at **Section 2** of this document above; and

the “*Competitions*” section of the table at **Section 2** of this document above,

to provide you with information and to tell you about our products, services or events or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you, whether by post, email, SMS, messaging applications and telephone (**Direct Marketing Communications**).

Inferred consent and reasonable expectations of direct marketing

Without limitation to paragraph 6.1, if you have provided inferred or implied consent (e.g. not opting out where an opt-out opportunity has been provided to you) or if it is within your reasonable expectation that we send you Direct Marketing Communications given the transaction or communication you have had with us, then we may also use your personal information for the purpose of sending you Direct Marketing Communications which we consider may be of interest to you.

Opt-out

If at any time you do not wish to receive any further Direct Marketing Communications from us or others under this Section 6, you may ask us not to send you any further information about products and services and not to disclose your information to other organisations for that purpose. You may do this at any time by using the “unsubscribe” facility included in the Direct Marketing Communication or by contacting us via the details set out at the top of this document.

Credit Information and our Credit Reporting Policy

Credit information generally

The *Privacy Act 1988* (Cth) contains provisions regarding the use and disclosure of credit information, which applies in relation to the provision of both consumer credit and commercial credit.

Credit information and Sealanes

As we provide terms of payment of accounts which are greater than 7 days, we are considered a credit provider under the Privacy Act in relation to any credit we may provide you (in relation to the payment of your account with us).

We use credit related information for the purposes set out in the “*Account Application / Sales*” section of the table at **Section 2** above and our **Credit Reporting Policy** which includes but is not limited to using the information for our own internal assessment of your credit worthiness.

Storage and access

We will store any credit information you provide us, or which we obtain about you, with any other personal information we may hold about you.

You may request to access or correct your credit information in accordance with the provisions of **Section 11** and the provisions of our **Credit Reporting Policy**.

Complaints

Please see **Section 12** and the provisions of our **Credit Reporting Policy** if you wish to make a complaint in relation to our handling of your credit information.

Our Credit Reporting Policy

Please see our **Credit Reporting Policy** for further information as to the manner in which we collect, use, store and disclosure credit information.

Anonymity and pseudo-anonymity

We generally do not provide you with the option of dealing with Sealanes on an anonymous basis or through the use of a pseudonym unless you deal with us through a social media platform where you don't have to provide your real name to create an account. Despite this, there may be circumstances in which it is no longer practicable for Sealanes to correspond with you in this manner and your correct personal information is usually required in order to provide you with our products and services or to resolve any issue you may have.

Cross Border Disclosure

Cross border disclosures

Any personal information collected and held by Sealanes may be disclosed to, and held at, a destination outside Australia, where we utilise third party service providers to assist Sealanes with providing our goods and services to you. Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.

As we use service providers and platforms which can be accessed from various countries via an Internet connection, it is not always practicable to know where your

information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed above.

In addition we may utilise overseas IT services (including software, platforms and infrastructure), such as data storage facilities or other IT infrastructure. In such cases, we may own or control such overseas infrastructure or we may have entered into contractual arrangements with third party service providers to assist Sealanes with providing our products and services to you.

Provision of informed consent

By submitting your personal information to Sealanes, you expressly agree and consent to the disclosure, transfer, storing or processing of your personal information outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to personal information. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

The *Privacy Act 1988* requires us to take such steps as are reasonable in the circumstances to ensure that any recipients of your personal information outside of Australia do not breach the privacy principles contained within the *Privacy Act 1988*. By providing your consent, under the *Privacy Act 1988*, we are not required to take such steps as may be reasonable in the circumstances. However, despite this, we acknowledge the importance of protecting personal information and have taken reasonable steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

If you do not consent

If you do not agree to the disclosure of your personal information outside Australia by Sealanes, you should (after being informed of the cross border disclosure) tell Sealanes that you do not consent. To do this, either elect not to submit the personal information to Sealanes after being reasonably informed in a collection notification or please contact us via the details set out at the top of this document.

Data security and quality

Sealanes' security generally

We have taken steps to help secure and protect your personal information from unauthorised access, use, disclosure, alteration, or destruction. You will appreciate, however, that we cannot guarantee the security of all transmissions or personal information, especially where human error is involved or malicious activity by a third party.

Notwithstanding the above, we will take reasonable steps to:

make sure that the personal information we collect, use or disclose is accurate, complete and up to date;

protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and

destroy or permanently de-identify personal information if it is no longer needed for its purpose of collection.

Accuracy

The accuracy of personal information depends largely on the information you provide to us, so we recommend that you:

let us know if there are any errors in your personal information; and

keep us up-to-date with changes to your personal information (such as your name or address).

We provide information about how you can access and correct your information in **Section 11**.

Access to and correction of your personal information

You are entitled to have access to any personal information relating to you which we hold, except in some exceptional circumstances provided by law (including the *Privacy Act 1988* (Cth)). You are also entitled to edit and correct such information if the information is inaccurate, out of date, incomplete, irrelevant or misleading.

If you would like access to or correct any records of personal information we have about you, you are able to access and update that information (subject to the above) by contacting us via the details set out at the top of this document.

Resolving Privacy Complaints

Complaints generally

We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

Contacting Sealanes regarding complaints

If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your personal information, please contact us:

Email: feedback@sealanes.com.au

Address: PO Box 685, South Fremantle, Western Australia, 6958

Please mark your correspondence to the attention of the Privacy Officer.

Steps we take to resolve a complaint

In order to resolve a complaint, we:

may liaise with you after receiving your complaint to identify and define the nature and cause of the complaint and any other details necessary to take any required action;

will keep you informed of the likely time within which we will respond to your complaint; and

will inform you of the legislative basis (if any) of our decision in resolving such complaint.

Register of complaints

We will keep a record of the complaint and any action taken in our Continuous Improvement Register.

Consent, modifications and updates

Interaction of this Policy with contracts

This Privacy Policy is a compliance document prescribed by law rather than a legal contract between two or more persons. However, certain contracts may incorporate all, or part, of this Privacy Policy into the terms of that contract. In such instances, Sealanes may incorporate the terms of this policy such that:

certain sections or paragraphs in this policy are incorporated into that contract, but in such a way that they do not give rise to contractual obligations onto Sealanes, but do create contractual obligations on the other party to the contract; and

the consents provided in this policy become contractual terms provided by the other party to the contract.

Acknowledgement

By using our website, purchasing a product or service from Sealanes, or otherwise submitting your personal information to us where you have been provided with a copy of our Privacy Policy or had a copy of our Privacy Policy reasonably available to you, you are acknowledging and agreeing:

to provide the consents given by you in this Privacy Policy; and

that you have been informed of all of the matters in this Privacy Policy.

Modifications and updates

We reserve the right to modify our Privacy Policy as our business needs require. We will take reasonable steps to notify you of such changes (whether by direct communication or by posting a notice on our website). If you do not agree to our continued use of your personal information due to the changes in our Privacy Policy, please cease providing us with your personal information and contact us via the details set out at the top of this document.