



## CAPRICORN PRIVACY POLICY (released 16 January 2019)

We are bound by the Australian Privacy Principles of the *Privacy Act 1988 (Cth)* and the New Zealand Privacy Principles of the *Privacy Act 1993(NZ)*.

We are committed to protecting your personal information in accordance with these Privacy Principles and will only use or disclose personal information and any business- related information we hold about you in accordance with this Privacy Policy or as otherwise notified to you. Capricorn believes that respect for your privacy forms part of the ongoing trust Capricorn wishes to develop with you.

“Personal information” is information about an individual who is either identified in the information or whose identity can be ascertained from the information.

This Privacy Policy applies to personal information and any business-related information that we collect from you. It also applies to personal information and business-related information that we collect about you from third parties, including credit information received through the credit reporting system. Specific information about our credit reporting policy is included in this Privacy Policy under the heading “Credit Reporting”.

We can provide you with this Privacy Policy in an alternative form if you wish – such as a printed version.

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## Who does this Privacy Policy apply to?

This Privacy Policy applies to Capricorn Society Limited (ACN 008 347 313) and its subsidiaries (referred to in this Privacy Policy as “**we**”, “**us**” or “**our**”) not including Capricorn Mutual Ltd (ACN 104 601 194). The Privacy Policy of Capricorn Mutual Limited (ACN 104 601 194) is available at the Capricorn Mutual Limited website ([www.capricornmutual.com](http://www.capricornmutual.com)).

It applies to **all** our business operations and the products and services we provide including:

- Trade credit accounts provided by Capricorn Society Limited;
- Shares issued by Capricorn Society Limited;
- Extended finance provided by Capricorn Society Limited including Capezifinance®;
- Finance broking services provided by Capricorn Society Financial Services Pty Ltd (ACN 129 134 667);
- Risk Services arranged through Capricorn Risk Services Pty Ltd (ACN 111 632 789), including general insurance brokered by Capricorn Insurance Services Pty Ltd (ACN 154 801 377 and AFSL 435197);
- Marketing services provided by Capricorn Society Limited including through the Purple Pages® trade directory and Ignition® magazine;
- Events including Gala Dinners, trade shows, golf days and BBQ’s provided by Capricorn Society Ltd;
- ‘Capricorn Convention’ and other travel services provided by Capricorn Travel Australia Pty Ltd (ACN 008 926 645);
- ‘Capricorn Fuel Card’ provided by Capricorn Society Ltd in association with third party providers;
- Capricorn Service Data®, Capricorn Vehicle Videos® and AutoBoost® provided by Capricorn Society Ltd in association with third party providers; and
- The recruitment and engagement of our officers, employees, contractors and sub-contractors.

By providing us with information, including business and personal information, you consent to it being used by us for the purposes set out or permitted in this Policy or as otherwise authorised.

## What information do we collect and from where?

We collect your information so that we can perform various functions and activities – especially the provision of the products and services that you request from us or that are made available to you if you are a Member of Capricorn.

We also collect your information where the law requires us to do so.

If you do not provide us with the information we request, we may not be able to:

- Provide you with the products and services that you request from us or that may be available to you as a customer or as a member;
- Manage and administer our relationship with you;
- Let you know about other products or services or benefits associated with being one of our members or customers that may be of interest to you; and
- Verify your identity and protect against fraud.

### **Collecting information from you**

We collect most information directly from you when you apply for one or more of our products and services or use those products and services. For example, you provide us with information when you complete an application for a trade credit account, register for an event, request that we broker insurance on your behalf, deal with us over the phone or use our websites (including [capricorn.coop](http://capricorn.coop), [capricornrisk.com](http://capricornrisk.com), [capricorninsurance.com.au](http://capricorninsurance.com.au), [capricorn-travel.com.au](http://capricorn-travel.com.au) and [theworkshop.capricorn.coop](http://theworkshop.capricorn.coop)) We may collect and hold information from you such as your:

- Name, personal and business contact details including addresses, phone numbers, and email addresses and gender;
- Tax file number (in Australia), Inland Revenue Department number (in New Zealand) and GST number;
- Date of birth;
- Financial details relating to you personally and any business you own or are involved in;
- Credit history with us and with third parties including nominated trade referees and details of your trading history with them and our preferred suppliers;
- Reports from credit reporting agencies concerning your creditworthiness or credit history;
- Transaction and correspondence history with us;
- Number of shares held in Capricorn;
- Bank account and credit card details;
- Driver's licence details;
- Passport details, visa information, health issues, travel preferences and frequent flyer information relevant to your travel requirements;
- Insurance details; and
- Details required by third parties if you have engaged us to arrange a product on your behalf (for example, a fuel card arranged by us, finance brokered by us or insurance and risk protection arranged by us) including name, address, date of birth, gender, marital status, occupation, account details, contact details and financial information.

### **Collecting publicly available information**

We may also collect information about you that is publicly available, including information from:

- Phone directories and trade directories;
- Websites; and
- Public registers such as; the companies register, business names register and the personal property securities register in Australia and New Zealand.

### **Collecting information from third parties**

We may also collect information about you from third parties. For example, we may collect information from:

- Credit reporting bodies if we request a commercial or consumer credit report about your credit history (see the "Credit Reporting" for more information about our credit reporting policy);

- Our preferred suppliers including as you transact with them through your trade credit account;
- Other credit providers or suppliers if you put them forward as a trade reference;
- Our related companies so we can better manage your relationship with us as a whole; and
- Marketing companies, event organisers, mail houses and other services providers if we use them to assist us in providing our products and services.

### ***Collecting sensitive information***

Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or biometric information.

We will not collect, use or disclose sensitive information about you unless:

- we are legally required to do so; or
- we need that information for one of our functions or activities and we have your consent.

We may, for example, collect the following types of sensitive information about you:

- health information if Capricorn Insurance Services Pty Ltd in the provision of insurance broking services to you is assisting to arrange Workers Compensation Insurance or other personal insurance or assisting you with a claim you have made that involves a personal injury or your health more generally;
- health information if Capricorn Travel Australia Pty Ltd is making travel arrangements on your behalf; or
- information about your membership of professional and trade associations to assist us represent the interest of its members at an industry level when dealing with government or industry bodies.

### ***Collecting information required by law***

We may collect information from you because we are required or authorised to do so under law. We will tell you when collection is required or authorised by law.

For example, before we can provide you with a trade credit account or any extended lending product, we are required under anti-money laundering and counter terrorism financing law to collect certain information from you such as your driver's licence or passport to verify your identity.

### ***Unsolicited Information***

Sometimes we may receive unsolicited information about you. If so, we will check whether that the information is reasonably necessary for our functions or activities and we could have collected it from you if we had solicited the information. If it is, we'll handle this information the same way we do with other information we seek from you. If not, and it is lawful and reasonable to do so, we'll ensure we do the right thing and destroy or de-identify it.

### ***Collecting Information Prospectively***

We may also collect information from you or from third parties prospectively, having identified you as a person that may wish to use our products or services in the future.

## **Collecting information from Prospective Employees**

When you are dealing with us as a prospective employee, Capricorn generally collects and uses information about you in order to process and evaluate your application for employment, including identification information and your employment history.

Unsuccessful application forms may be kept on file up to six months to allow those candidates future opportunities.

## **Our websites**

### **Browsing**

We may collect information from you when you browse on or are logged in to our websites. This may include personal information and information such as the date and time of your visit to the site, the pages accessed, and documents viewed, the previous sites visited, the browser type, the browser language, general location information, information about the device you used to visit the site and your IP address.

### **Cookies**

A cookie is a small file containing a string of characters to your computer that uniquely identifies your browser. It is information that your web browser sends back to our website server whenever you visit it again. We use cookies to 'remember' your browser between page visits. In this situation, the cookie identifies your browser, not you personally. No personal information is stored within our cookies.

### **Google Analytics**

We use Google Analytics to collect information about visitors to our website. Google Analytics uses first-party cookies and JavaScript code to help analyse how users use our websites. It anonymously tracks how visitors interact with this website, including how they have accessed the site (for example, from a search engine, a link, an advertisement) and what they did on the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers that are in the United States and around the world. Google will use this information for the purposes of compiling reports on website activity and providing other services relating to website activity. You can prevent your information from being collected by Google Analytics by refusing the use of cookies by selecting the appropriate settings on your browser or by installing the Google Analytics Opt-out Browser Add-on.

## **Consents and notifications**

### **Your consent is important**

We may need your consent to use or disclose your information in certain circumstances including where we want to use your information for a purpose that is not related to the purpose for which we collected it in the first place.

## ***Notifying you of information received***

When we receive information from you directly, we'll take reasonable steps to notify you of:

- Why we collected your information including providing you with our contact details,
- How we collected your information (if not from you);
- Who we may disclose it to;
- How we may use it;
- Whether the collection is required or authorised by law such as our obligation to verify your identity as part of anti-money laundering obligations;
- How you can access it, seek correction of it or make a complaint and how we will deal any complaint;
- Whether we will disclosure information to overseas recipients; and
- The main consequences if your information is not collected.

Sometimes we collect your information from third parties and you may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

## **Using your information**

### ***How will we use your information?***

We may collect, use and disclose information we collect about you for several purposes, including:

- To enable us to consider your application for a product or service;
- To allow us to provide you with our products and services;
- To allow us to manage our relationship with you, including communicating with you about benefits, events or products and services that you may be receiving or may be entitled to receive;
- To allow us to manage our arrangements with our preferred suppliers or other third parties that may be involved in the provision of products or services to you and to allow these same preferred suppliers and third parties to manage their arrangements with you;
- To allow us to help a third party provide to you or manage a product or service when we are involved in broking or facilitating the provision of that product or service (for example, insurance brokered through Capricorn Insurance Services Pty Ltd or finance brokered through Capricorn Society Financial Services Pty Ltd) or where your access to that third party product or service is based on your relationship with us (for example; protections available from Capricorn Mutual Limited);
- To allow us to provide you with access to products and services available from us in association with third party providers, including Capricorn Service Data®, Capricorn Vehicle Videos® and AutoBoost®;
- To assist in the management of arrangements with third parties where we have outsourced functions to them that are relevant to the provision of our products or services to you;
- To assist in our general management and administration including for example; rendering of accounts, risk management, strategic development, systems development, credit management, debt collection, staff training and research;
- To deal with any enquiries, complaints or concerns that you may raise with or against us and to manage any legal action that may arise between you and us;
- To prevent or investigate any actual or suspected fraud, illegal act or misconduct;

- To comply with any relevant laws, regulations, codes of practice or payment system requirements; and
- Any other purpose that permitted by law or that you consent to.

You also permit Capricorn to disclose your information if by your disclosure (including by your agent, servant or delegate) to a mass media organisation or other person, your information has ceased to be confidential.

### ***What do we do with government-related identifiers?***

In certain circumstances we may be required to collect government-related identifiers such as your tax file number. We will not use or disclose this information unless we are authorised by law.

For example, we collect Tax File Numbers to complete Australian Investment Income Returns and, if applicable, calculate withholding tax on dividends paid. If you don't provide this information, we may not be able to provide income information to the Australian Tax Office and may be required to deduct withholding tax from any dividends paid at the highest rate.

### **Disclosing your information**

Consistent with the uses of your information described above, we may disclose information about you to:

- Our related companies, and our employees, officers, assignees, contractors, service providers, mail-houses and external advisers;
- Our preferred suppliers, relating to:
  - the status of your trade credit account (including if it is placed on stop credit) or any other product or service you may receive from us;
  - transactions conducted using your trade credit account;
  - your business contact and transactions details so that they may direct market to you; and
  - any disputes you may have with the preferred supplier or us relating to the preferred supplier;
- Third party providers of industry publications, such as the Australian Automotive Aftermarket Association;
- Organisations that verify identities or provide information on politically exposed persons;
- Credit reporting bodies;
- Your agents, advisers, referees, executor, administer, trustee, the beneficiary of any trust of which you are a trustee, your guardian or attorney;
- Your current and prospective co-borrowers, guarantors, co-guarantors, covenantors and co-covenantors;
- Law enforcement bodies, regulatory bodies and government bodies;
- Payment system operators;
- Your current and prospective insurers and risk services providers and their authorised agents or reinsurers, where you have requested services from Capricorn Insurance Services Pty Limited or are also a member of Capricorn Mutual Limited;
- Your current and prospective financiers, where you have requested broking services from Capricorn Society Financial Services Pty Ltd;

- Capricorn Risk Services Pty Ltd for the purposes of providing you access to protections available through Capricorn Mutual Ltd and general insurance products brokered through Capricorn Insurance Services Pty Ltd;
- Capricorn Mutual Ltd and their authorised representatives Capricorn Mutual Management Pty Ltd and Capricorn Risk Services Pty Ltd for the purposes of obtaining and dealing with your Capricorn Mutual Ltd membership and protections;
- Airlines, accommodation providers and other travel service providers, where you have requested travel agency services from Capricorn Travel Australia Pty Ltd; and
- Any other party that you consent to.

### **Marketing and your privacy**

The Capricorn business model focuses on people and organisations working together for the mutual benefit of all parties involved. As part of our services to you, we may use or share your information so that products, services or benefits that we think you may be interested in learning about can be identified and direct marketed to you.

We, or our preferred suppliers or other third parties that we have a relationship with, may contact you from time-to-time about new or existing products or services that we or they offer.

We consider that direct marketing to you by us, our preferred suppliers and other third parties with which we have a relationship forms an integral part of delivering services to you and is directly related to the primary purpose for which we originally collected your information. Without such a service, the communication between you, us and our preferred suppliers and other third parties which we have a relationship with would be substantially reduced and you would be unlikely to receive the benefits and returns you expect from being one of our members or customers.

We will provide your information to preferred suppliers or other third parties for the purposes of that preferred supplier or third party directly marketing their products or services directly to you.

You can let us know at any time if you no longer wish to receive marketing materials from us (see "Contact Us"). Also, you can let any preferred supplier or third party know at any time if you no longer want to receive marketing materials from them.

Our direct marketing publications all include details on how you can opt -out of receiving such communication in the future.

### **Overseas Disclosures**

We may share your information across the countries we operate in for the purposes set out or permitted in this Policy or as otherwise authorised. We currently operate in Australia and New Zealand.

Our websites and some of our products or services, or parts of them, may be hosted by or supported by service providers that operate from across the world. We and our service providers may also use cloud-based software solutions to perform internal processes and provide you with the products and services you request. This means that any information which you provide to us, including by email or through our websites or the use of the products and services we provide, may be transferred, used or stored outside of Australia or New Zealand. We take steps to ensure that where your information is transferred outside of Australia or New Zealand by us or our service providers, appropriate measures



and controls are in place to protect that information.

Your information may be shared, stored or used by an overseas person or organisation in order to provide you with the products or services you have requested or are entitled to receive from us, including in the following situations:

- Capricorn Risk Services Pty Ltd, Capricorn Mutual Ltd and Capricorn Insurance Services Pty Ltd may provide information to overseas based insurers, agents and reinsurers connected with protections and insurance policies you may have or may be applying for;
- Capricorn Travel Australia Pty Ltd may provide your information to overseas based travel service providers such as airlines, hotels and tour operators in connection with travel services being arranged on your behalf. Dependent on the travel services you've requested, those travel service providers could be located anywhere in the world including in countries where the privacy laws differ substantially from Australia. Capricorn Travel Australia Pty Ltd cannot control the activities of these travel service providers. If you engage with Capricorn Travel Australia Pty Ltd you consent to your information being provided to travel service providers without Capricorn Travel Australia Pty Ltd needing to take reasonable steps to ensure that the Privacy Act will be complied with and in circumstances where the recipient may not be accountable under the Privacy Act and you may not be able to seek redress under the Privacy Act;
- When providing you with products and services available from us in association with or supported by third party providers, including Capricorn Service Data®, Capricorn Vehicle Videos® and AutoBoost® where those third-party providers operate in whole or in part from overseas or themselves use overseas third-party providers to provide the relevant products or services;
- When you consent to the disclosure; or
- When obtaining your consent is not practicable and we consider that the disclosure is for your benefit and that you would have consented to the disclosure.

We will not share any of your credit information with a credit reporting body, unless it has a business operation in the country in which you reside. We are not likely to share credit eligibility information (that is, credit information we obtain about you from a credit reporting body or that we derive from that information) with organisations unless they have business operations in the country in which you reside.

## **Credit Reporting**

### ***Collecting Credit Information***

We participate in the credit reporting system

We may obtain a credit report about you from a credit reporting body if you:

- Apply for credit with us (for example; through a trade credit account or extended finance through a Capezifinance® product);
- Put yourself forward as a covenantor or guarantor for another person applying for credit or receiving credit from us; or
- Currently receive credit from us or are currently a covenantor or guarantor for another person that currently receives credit from us.

To request a credit report, we will disclose to a credit reporting body information that identifies you (such as your name, address, date of birth and driver's licence number) and relates to the credit that you are applying for or seeking to covenant or guarantee.

Credit reports contain information about your credit worthiness and credit history with other credit providers. This information may include information about your previous and current credit applications, credit facilities, credit repayment history and any payment defaults.

We will often combine information contained in credit reports with information that we already hold about you or that has been obtained from other sources (for example, trade references from existing suppliers or any past or current relationship you have had with us).

### **Using Credit Information**

We will use this information to:

- Assess any application you make for credit;
- Assess your suitability as a guarantor;
- To assist in our general management and administration including for example; risk management, strategic development, systems development, credit management, debt collection, staff training and research; and
- Comply with any relevant laws, regulations, codes of practice and payment system requirements.

### **Disclosing Credit Information to credit reporting bodies**

As a participant in the credit reporting system we may disclose information about your credit history with us to credit reporting bodies including the following:

- That you receive credit from us;
- The type and amount of credit that you receive;
- The terms and conditions of your credit;
- Your payment history;
- Any default or failure to make payment; and
- Any behaviour that is considered by us to be seriously adverse, such as fraud or evasion of repayment obligations.

When we give your information to a credit reporting body, it may then be included in credit reports that the credit reporting body then gives to other credit providers. Some of that information may reflect adversely on your credit worthiness, for example, if you fail to make payments. That sort of information may affect your ability to get credit from other credit providers.

We may disclose information to the following credit reporting bodies:

#### **Dun and Bradstreet**

	<b>Australia</b>	<b>New Zealand</b>
<b>Phone:</b>	1300 734 806	0800 362 222
<b>Email:</b>	<a href="mailto:pacaustral@dnb.com.au">pacaustral@dnb.com.au</a>	<a href="mailto:pacnz@dnb.co.nz">pacnz@dnb.co.nz</a>
<b>Website</b>	<a href="http://checkyourcredit.com.au">checkyourcredit.com.au</a>	<a href="http://checkyourcredit.co.nz">checkyourcredit.co.nz</a>

#### **Veda**

	<b>Australia</b>	<b>New Zealand</b>
<b>Phone:</b>	1300 762 207	0800 692 733
<b>Email:</b>	<a href="mailto:Membership.query@veda.com.au">Membership.query@veda.com.au</a>	<a href="mailto:publicaccess.nz@veda.co.nz">publicaccess.nz@veda.co.nz</a>
<b>Website</b>	<a href="http://www.mycreditfile.com.au">www.mycreditfile.com.au</a>	<a href="http://mycreditfile.co.nz">mycreditfile.co.nz</a>

Credit reporting bodies are required to have a policy explaining how they manage your personal information. You can contact these credit reporting bodies for more information about their policy or information about you that they may hold.

We will not disclose credit information or credit eligibility information to entities that do not have an Australian link.

### ***Contact credit reporting bodies if you think you have been the victim of a fraud***

You are entitled to request that a credit reporting body not use or disclose credit reporting information they hold about you in circumstances where you reasonably believe that you have been or are likely to be a victim of fraud, including identity-related fraud. The period while this applies is called a "ban period". You can make such a request to any of the credit reporting bodies listed above.

### ***Pre-screening assessments by credit reporting bodies***

We will not use any information that we receive from credit reporting bodies for marketing purposes. However, for some products or services we may ask a credit reporting body to use credit information they hold to identify individuals that may be eligible for a product or service and to send those individuals information about that product or service on our behalf. This is known as "pre-screening assessments". If you are such an eligible person you may receive this type of information. You have the right to contact credit reporting bodies to say that you don't want your information used in pre-screening assessments. If you do this, the credit reporting body must not use your information for the purpose of pre-screening assessments.

### ***Managing your credit information***

We manage credit information about you in the same way that we manage all other information. See "Taking care of your information", "Accessing your information" and "Resolving your privacy issues" for more information.

## **Taking care of your information**

### ***How do we take care of your information?***

We store information in different ways, including in paper and electronic form. The security of your information is important to us and we take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- Physical security of business premises;
- Confidentiality requirements of our employees;
- Record management policies;
- Security measures for access to our systems;
- Only giving access to information to a person who reasonably requires access to it in order to perform their duties;
- Control of access to our buildings; and
- Electronic security systems, such as firewalls and data encryption on our websites.

We may store information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses of it.

## ***What happens when we no longer need your information?***

We'll only keep your information for as long as we require it for the purposes that it was collected for. We're also required to keep some of your information for certain periods of time under law. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

We will retain information and use it to ensure that we identify persons who have, in the past, failed to meet their repayment obligations to Capricorn, either directly or through their association with a business.

## **Accessing your information**

### ***How do you access your information?***

Upon request we will give you access to your information in reasonable time unless there are certain legal reasons for why we can't.

We will give you access to your information in the form you want it where it's reasonable and practical to do so. We may charge you for our reasonable expenses relating to giving you access, but we'll always notify you of any expenses prior to complying with your request for access.

In certain circumstances we are not able to give you access to your information. For example, this may include when:

- We reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- The access would have an unreasonable impact upon the privacy of other individuals; or
- The request for access is frivolous or vexatious; or
- The access would be unlawful or would prejudice any legal investigations.

If we can't provide your information in the way you've requested, we will tell you why in writing and attempt to find an alternative way in which to satisfy your request. If you are not happy with how we have dealt with your request, you can complain. See "Resolving Your Privacy Issues".

### ***How do you access your credit information?***

Where you request access to credit information about you that we've got from credit reporting bodies (or based on that information), you have the following additional rights.

We must:

- Provide you access to the information within 30 days (unless unusual circumstances apply);
- Make the information clear and accessible; and
- Ask you to check with credit reporting bodies what information they hold about you.

This is to ensure it is accurate and up-to-date.

We are not required to give you access to this information if it would:

- Be unlawful; or
- Harm the activities of an enforcement body (e.g. the police).

We may also restrict what we give you if it would harm the confidentiality of our commercial information.

If we refuse to give access to any credit eligibility information, we will tell you why in writing.

If you have concerns, you can complain. See "Resolving your Privacy Issues".

## **Correcting your information**

### ***How do you correct your information?***

We take reasonable steps to make sure that the information we collect, use or disclose is accurate, complete and up-to-date. We also take reasonable steps to ensure that information we hold is relevant having regard to the purpose for which it was collected.

Contact us if you think there is something wrong with the information we hold about you and we'll try to correct it if it's inaccurate, out of date, incomplete, irrelevant or misleading.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can - if we can't, then we'll let you know in writing.

### ***What additional things do we have to do to correct your credit information?***

Whether we made the mistake or someone else made it, we are required to help you ask for the information to be corrected. To do this, we might need to talk to others. However, the most efficient way for you to make a correction request is to send it to the organisation which made the mistake.

If we're able to correct the information, we'll let you know within a reasonable period of deciding to do this. We'll also let the relevant third parties know as well as any others you tell us about. If there are any instances where we can't do this, then we'll let you know in writing.

If we're unable to correct your information, we'll explain why in writing within a reasonable period of making this decision.

If you have concerns about how we have handled a request to correct information you can complain. See "Resolving your Privacy Issues" for more information.

### ***Time frame for correcting information***

If we agree to correct your information, we'll do so within 30 days from when you asked us, or a longer period that has been agreed by you.

If we can't make corrections within a 30-day time frame or the agreed time frame, we will:

- Let you know about the delay, the reasons for it and when we expect to resolve the matter;
- Ask you to agree in writing to give us more time; and
- Let you know you can complain to the Office of the Australian Information Commissioner.

## **Resolving your privacy issues**

## ***How do you make a complaint?***

If you believe that there has been a breach of privacy or you do not agree with a decision we have made about your access to or correction of personal information, you can make a complaint to us through our Privacy Officer on the details below under the heading "Contact Us" and we will endeavour to resolve it by following our internal complaint resolution process.

If your complaint relates to how we handled an access or correction request, then you may take your complaint directly to the Office of the Australian Information Commissioner. You are not required to let us try to fix it first, although we would welcome you giving us the opportunity to try and do so.

If your complaint is about other things in relation to your personal information, we will let you know how we will deal with it within 7 days.

If we can't fix things within 30 days or any longer agreed timeframe, we'll let you know why and how long we think it will take. We will also ask you for an extension of time to fix the matter.

If you have any concerns, you may complain to the Office of the Australian Information Commissioner or New Zealand Privacy Commissioner as applicable.

If your complaint relates more generally to a product or service provided by Capricorn Insurance Services Pty Ltd or Capricorn Society Financial Services Pty Ltd, then it may be more appropriate to raise that complaint under the separate Complaints and Dispute Handling Process that each of those companies has. An External Dispute Resolution Scheme can be accessed as part of these processes. For further details, including a copy of the relevant Complaints and Dispute Handling Process, please contact Capricorn as per the contact details provided below.

## ***Need more help?***

For further information about privacy issues in Australia and protecting your privacy, you may visit the Office of the Australian Information Commissioner website at <http://www.oaic.gov.au/privacy>.

For further information about privacy issues in New Zealand and protecting your privacy, you may visit the Privacy Commissioner's website at <http://www.privacy.org.nz>.

If you still feel your privacy issue hasn't been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner or New Zealand Privacy Commissioner as applicable.

### **The Office of the Australian Information Commissioner**

Phone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)  
Mail: GPO Box 5218  
Sydney NSW 2001

## **The Office of the New Zealand Privacy Commissioner**

Phone: 0800 803 909  
Email: [enquires@privacy.org.nz](mailto:enquires@privacy.org.nz)  
Website: [www.privacy.org.nz](http://www.privacy.org.nz)  
Mail: PO Box 10-094  
The Terrace Wellington 6143

### **Contact us**

We care about your privacy and we always welcome your feedback. Please contact us if you have any questions or comments about the way we handle your information.

Phone: 1800 327 437 (Australia)  
0800 401 444 (New Zealand)  
Email: [privacy@capricorn.coop](mailto:privacy@capricorn.coop)  
Mail: The Privacy Officer  
Capricorn Society Limited  
Locked Bag 3003  
West Perth WA 6872  
Australia

### **Dealing with us anonymously**

If you have general enquiry type questions, you can choose to do this anonymously or by using a pseudonym. We may also offer anonymity in respect of surveys and questionnaires. However generally, we won't be able to deal with you anonymously or where you are using a pseudonym if:

- It is impracticable for us to do so; or
- We are required or authorised by law or a court/tribunal order to deal with you personally.

It is impractical for us to offer anonymity or pseudonymity to individuals in relation to our main business activities, including the provision of trade credit accounts. To comply with anti-money laundering and counter terrorism financing law we cannot provide credit to anyone unless we have identified them.

### **Changes to this Privacy Policy**

This Privacy Policy may change at any time. We will let you know of any changes to this Privacy Policy by posting a notification on our website. We encourage you to review our Privacy Policy on our website from time-to-time for any changes. Any changes to our Privacy Policy will be effective on the date they are published on our website.