

# **Privacy Policy**

## **Commercial Credit Information**



**INDUSTRIAL SANDS & GRAVELS PTY LTD ACN: 072 258 158**

**2017**

## **The Policy**

Industrial Sands & Gravels, trading as Palladium Quarries (“the Company”), has adopted this Credit Information Privacy Policy to outline the commitment that the Company has made to protect the personal and credit information about individuals that it receives.

This Credit Information Privacy Policy has been adopted in accordance with Australian law requirements under the Privacy Act and the Credit Reporting Privacy Code registered under the Privacy Act.<sup>1</sup>

The Company may amend this Credit Information Privacy Policy from time to time and at our discretion and without notice.

## **The information we collect**

We may collect and hold credit information and credit eligibility information about you if you are one of the following individuals in relation to one of our customers or prospective customers:

- company: the directors and shareholders of that company;
- partnership: the partners; or
- sole trader: that sole trader.

We primarily collect this information directly from you, for example through the application form that you have completed, telephone calls and written correspondence. The information that we collect directly from you includes information we use to identify you such as your name, date of birth, occupation, driver’s licence number and residential address as well as whether you rent or own that property. We may also collect personal credit information and credit eligibility information about you from third parties such as credit reporting bodies and publicly available information. This includes your credit application history, repayment history, default history, details of any previous business relationships, any court action (including bankruptcy proceedings) relating to any credit provided to or applied for by you and any information typically included in reports prepared by credit reporting bodies.

## **How we use and disclose the information**

The Company collects, holds, uses and discloses individuals’ credit information and credit eligibility information primarily to assess whether to provide commercial credit to a prospective customer and in the ongoing management of customers’ accounts. We may also use your credit information and credit eligibility information that we hold about you as permitted or required by law.

The Company may disclose this information to other companies within the conglomerate or to third party service providers engaged by us to assist with processing applications from prospective customers and managing customers’ accounts. These third parties only use the information for the

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<sup>1</sup> *The Privacy Act 1988* (Cth).

purpose we have provided it to them as part of their engagement and to maintain confidentiality of all information.

The Company may also disclose your credit information and credit eligibility information to credit reporting bodies, for the purpose of ensuring that credit information held by those organisations is up-to-date and so that they can assess your credit worthiness.

We only disclose an individual's credit information and credit eligibility information in accordance with the relevant commonwealth and state Privacy Acts and the Credit Reporting Privacy Code.

### **How we protect your information**

The Company has policies and processes in place to protect your credit information and credit eligibility information from misuse, interference, loss or unauthorized access, modification or disclosure. These include training programs which aim to ensure that relevant employees are aware of any privacy obligations regarding personal information to which they may have access, secure electronic databases to which access is only granted to those employees who need it to fulfil their role, use of secure networks and passwords.

The Company also takes reasonable steps to ensure that any third party service providers to whom the Company discloses credit information or credit eligibility information have in place an appropriate privacy policy and procedures to meet the applicable privacy law requirements.

### **How to access your information and request corrections**

Should you wish to access your credit eligibility information that is held by the Company, please contact Rachel Feldman. We will provide you with this information unless we are legally permitted or required not to. If we refuse to give you access to your credit eligibility information, we will explain why in writing. We will not charge an application fee to access your credit eligibility information, but we may charge a reasonable fee for giving access, including photocopying fees.

While the Company takes reasonable steps to ensure that any credit information or credit eligibility information we hold is accurate, up-to-date, complete, relevant and not misleading, you can request that we correct any errors relating to your credit information or credit eligibility information that we hold by contacting Rachel Feldman. ([rachel.feldman@palladiumquarries.com.au](mailto:rachel.feldman@palladiumquarries.com.au)).

### **Contact for privacy issues and complaints**

If you have any queries regarding this Credit Information Privacy Policy or any complaints that the Company has breached its obligations under Division 3 of Part IIIA of the Privacy Act or the Credit Reporting Privacy Code or any of its other privacy obligations relating to credit information, please contact Adam Grinberg ([adam.grinberg@palladiumquarries.com.au](mailto:adam.grinberg@palladiumquarries.com.au))

For us to investigate any complaint, you will need to provide us with sufficient details as well as any supporting information. We will acknowledge your complaint in writing within 7 days, investigate

and notify you in writing within a reasonable time (usually 30 days from the date on which the complaint was made) about the outcome of our investigation. If you are not happy with the outcome, you can access the external dispute resolution scheme which will be notified to you with the outcome or make a complaint to the Australian Information Commissioner/Privacy Commissioner: [www.oaic.gov.au](http://www.oaic.gov.au).