PRIVACY POLICY

At TBA Textiles Pty Ltd (**TBA**), we recognise the importance of your privacy and understand your concerns about the security of the personal information you provide to us. We comply with the Australian Privacy Principles (**APPs**) as contained in the *Privacy Act 1988* (Cth). The APPs detail how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

Personal information is information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

Sensitive Information, a sub-set of personal information, is information or an opinion about an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information and genetic information.
This policy details how TBA manages personal information about you.
In the course of doing business, we endeavour to collect business information only. However, the collection of personal information in some instances is necessary or unavoidable.

What personal information we collect and hold

The kinds of personal information we collect from you or about you depend on the transaction you have entered into with us, the goods and services you or your organisation have contracted us to provide, and the goods and services you or your organisation are interested in.

If you are a current or prospective customer or contractor, then the kinds of personal information that we commonly collect and hold from you or about you include: your name, address, phone, fax and mobile numbers, email address, and bank account or credit card payment details.

When you browse our website, use our application available through the Android or Apple store, contact us electronically or engage with us on social media, we may record geographical tagging and statistical data from your activity. We may use cookies to collect non personal information, and anonymous information about visits to our website and to track how you reached our website. You will be given the option to disable cookies when you visit our website, but this may prevent proper functionality of the website. In particular you may not be able to store your preferences, and some of our pages might not display properly. If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Our website also contains links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

How we collect and hold personal information

We aim to collect personal information only directly from you, unless it is unreasonable or impracticable for us to do so. For example, we collect personal information from you or about you from:

- correspondence that you submit to us;
- telephone calls and meetings with us; and
- your activity on our website, our application available through the Android or Apple store and social media platforms.

However, in some instances we may receive personal information about you from third parties. This may include product enquiries, warranty requests and/or delivery instructions etc.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions, activities and services. For example, we collect, hold, use and disclose your personal information as necessary to provide our goods and services.

Generally, we do not collect sensitive or health information. However, we may collect sensitive information from you or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. In all other situations, we will specifically seek your consent.

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction you have entered into, or provide the goods and services that you or your organisation have contracted us to provide.

We also collect, hold, use and disclose your personal information for related purposes that you would reasonably expect, such as our administrative and accounting functions, record keeping, fraud checks, warranty work and repair work, administering our warranty, providing you with information about other goods and services offered by us, providing you with information about new product launches, marketing and promotions, market research, newsletter communications, customer feedback and quality assurance surveys, statistical collation, social media analysis, application traffic analysis and website traffic analysis.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

Where we use your personal information for marketing and promotional purposes, you can opt out at any time by notifying us. Opt out procedures are also included in our marketing communications.

We may also disclose your personal information to third parties (including government departments and enforcement bodies) where required or permitted by law.

How we hold and store personal information

Your personal information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference and loss, and from unauthorised access, modification and disclosure.

- Data held and stored on paper is stored in lockable filing cabinets. Our premises have secured entry and monitored alarms.
- Data held and stored electronically, including “in the Cloud”, is protected by internal and external firewalls, limited access via file and network passwords, and files can be designated read-only or no access. We also require our IT contractors and other third parties to implement privacy safeguards.

Destruction and De-identification

We will retain your personal information whilst it is required for any of our business functions, or for any other lawful purpose.

We will take reasonable steps and we will use secure methods to destroy or to permanently de-identify your personal information when it is no longer required for any purpose for which the personal information may be used under this Policy and otherwise in accordance with the Privacy Act.

As an example, our destruction and de-identification methods may include:

- Paper records being placed in security bins and/or shredded; or
- Electronic records being deleted from all locations, to the best of our ability, or encrypted and/or placed beyond use.

Overseas disclosure

Ordinarily, we will not disclose your personal information overseas. However, we will only do so where:

- it is necessary to complete the transaction you have entered into; and
- you have provided consent; or
- we believe on reasonable grounds that the overseas recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- it is otherwise permitted by law.

Requests for access and correction

We will take reasonable steps to ensure that the personal information we use or disclose is accurate, complete and up to date, having regard to the purpose of the use or disclosure.

We rely on the personal information we hold about you to efficiently provide our goods and services. For this reason, it is very important that the personal information we collect from you is accurate, complete and up-to-date. To assist us to keep our records up-to-date, please contact us with any changes to your personal information.

We have procedures in place for dealing with and responding to requests for access to, and correction of, the personal information held about you.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why.

Data Breaches

In Australia, if we suspect that a data breach has occurred, we will undertake an assessment into the circumstances of the suspected breach within 30 days after the suspected breach has occurred. Where it is ascertained that a breach has actually occurred and where required by law, we will notify the Privacy Commissioner and affected individuals as soon as practicable after becoming aware that a data breach has occurred.

Complaints and Concerns

We have procedures in place for dealing with complaints and concerns about our practices in relation to the Privacy Act, the APPs and any alleged breach of this Policy. We will respond to your complaint in accordance with the relevant provisions of the Privacy Act.

Contact

Privacy Officer
TBA Textiles Pty Ltd
44 Gindurra Road
Somersby NSW 2250 Australia
T: 02 8004 3333 (Option 2)
E: lesley.mitchell@tba-pt.com.au

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