

# Privacy Policy

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## Who are we?

'We', 'us' and 'our' refer to the Product Stewardship Centre of Excellence Limited ACN 669 035 652 (CoE) and our related businesses.

## About this Privacy Policy

This privacy policy (**Privacy Policy**) applies to all information collected by us via this website, which is operated by CoE.

## Our commitment to protect your privacy

We understand how important it is to protect your personal information. This page sets out our privacy policy commitment in respect of the personal information we hold about you and what we do with that information.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it or as allowed under the law. It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles (**APPs**) and Part IIIA of the *Privacy Act 1988* (Cth) and any other relevant law.

Our Privacy Policy may change from time to time without prior notice. We may amend this Privacy Policy by updating it and posting it on our Website.

## Personal information

When we refer to **personal information** we mean information from which your identity is reasonably apparent.

The kinds of personal information we may collect about you will depend on how you interact with us:

- **When you use our website:** We collect general site traffic data for the purpose of site maintenance and improvement and understanding which and how often certain pages are viewed. While this data is generally anonymous, we may collect your IP address, approximate geographic location and data sent to us by your web browser, such as your operating system. Please refer to the 'Advertising and tracking' and 'Cookies' sections below for further information.
- **If you email us:** your name, email address and any other information contained within your email.
- **If you mail us:** your name, mailing address, and any other information you provide in the letter.

- **If you call us:** your name, mobile phone number and any other information you provide us.
- **If you contact us via social media:** your name, social media account username, date of birth, occupation, address or any other information publicly available on your account or that you may choose to provide us.

Where it is lawful and practicable to do so, you may remain anonymous in your dealings with us.

If you provide the personal information of another person in any correspondence with us, you warrant that the person has consented to the collection of their personal information for the reasons it is being collected.

### **Sensitive information**

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

We will not ask you to disclose sensitive information to us. If sensitive information is disclosed to us, we will take reasonable steps to de-identify the data or destroy it where we can.

### **Information collected from and provided to third parties**

Our website may contain links to the websites of third party providers of goods and services (**Third Party websites**).

If you have accessed Third Party websites through our website, and if those third parties collect information about you, we may also collect or have access to that information as part of our arrangements with those third parties.

Where you access a Third Party website from our website, cookie information, information about your preferences or other information you have provided about yourself may be shared between us and the third party.

### **Advertising and tracking**

When you view our advertisements on a Third Party website, the advertising company may use 'cookies' and in some cases 'web beacons' to collect information such as:

- the server your computer is logged onto;
- your browser type;
- the date and time of your visit; and
- the performance of their marketing efforts.

When you access our website after viewing one of our advertisements on a Third Party website, the advertising company may collect information on how you utilise our website (e.g. which pages you view) and whether you complete an online application.

## **Cookies**

We use 'cookies' to provide you with better and more customised service and with a more effective website.

A 'cookie' is a small text file placed on your computer by our web page server. A cookie can later be retrieved by our webpage servers. Cookies are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your internet browser.

When you access our website, you consent to our use of cookies as described in this Privacy Policy and our website Terms of Use.

We use cookies for different purposes such as:

- to allocate a unique number to your internet browsers;
- to customise our website for you;
- for statistical purposes;
- to identify if you have accessed a Third Party website; and
- for security purposes.

## **IP addresses**

Your IP address is the identifier for your computer when you are using the internet.

It may be necessary for us to collect your IP address for your interaction with various parts of our website.

## **Security of information**

The security of your information is very important to us. We regularly review developments in security and encryption technologies. Unfortunately, no data transmission over the internet can be guaranteed as totally secure.

We take all reasonable steps to protect the information in our systems from misuse, interference, loss, and any unauthorised access, modification or disclosure. If we no longer require your information, and we are legally permitted to, we will take all reasonable steps to destroy or de-identify the information.

We take reasonable steps to preserve the security of cookie and personal information in accordance with this Privacy Policy. If your browser is suitably configured, it will advise you whether the information you are sending us will be secure (encrypted) or not secure (unencrypted).

## **Direct marketing**

We will not use or disclose personal information about you for direct marketing purposes unless you have consented to that kind of use or disclosure.

We may use your personal information for direct marketing purposes. If you do not wish to receive direct marketing communications from us or from other organisations please click on the 'unsubscribe' link in any email we send you and you will be removed from future communications, or wish to know the source of the information being used, you may contact us via the ['Contact Us'](#) page

on our website or using one of the methods set out below. We will respond to your request as soon as practicable.

### **Do we disclose your personal information?**

We may disclose your personal information:

- to other organisations that are involved in the process of providing our services;
- to associated businesses that may want to market products to you;
- to companies that provide information and infrastructure systems to us;
- to our agents, contractors, external service providers to outsource certain functions, for example information technology support;
- to any person or entity, where you have provided us consent;
- to our auditors, insurers and re-insurers;
- to claims related providers, such as assessors and investigators who help us with claims;
- where we are authorised or required to do so by law, such as under the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth), government and law enforcement agencies or regulators;
- organisations that provide products or services used or marketed by us; or
- identity verification services.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- you have consented to us making the disclosure.

### **Disclosure to overseas entities**

We do not generally disclose personal information obtained from cookies to overseas entities in the course of our activities.

We may disclose your personal information to overseas recipients where the overseas recipient provides services to us, such as SaaS (software as a service) or cloud-based storage solutions.

The countries in which the overseas recipients are located will depend on the nature of the services being provided by us and the particular matter involved. We will, where practicable, advise you of the countries in which overseas recipients are likely to be located. The use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider. However, by providing us with your personal information, you consent to the storage of such information on overseas servers and you acknowledge and agree that APP 8.1 will not apply to the extent that such storage constitutes a cross-border disclosure.

## **Updating your personal information**

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us via one of the methods set out on the '[Contact Us](#)' section on our website or using one of the methods set out below. We will generally rely on you to ensure the information we hold about you is accurate or complete.

## **Access and correction to your personal information**

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time. We may charge an administrative fee for our costs of retrieving and supplying the information to you.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, where the information is stored on another entity's server and we do not have access to it, if the information relates to existing or anticipated legal proceedings, if your request is vexatious or if the information is commercially sensitive.

An explanation will be provided to you if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information by contacting us via one of the methods set out on the '[Contact Us](#)' section on our website or using one of the methods set out below .

If appropriate we will correct the personal information at the time of the request otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within 30 days.

If we refuse to correct personal information we will provide you with our reasons for not correcting the information.

We may require you to provide proof of or verify your identity if you want to access or correct your personal information that we hold. This verification of identity may occur over the phone, by email, video call or in person.

## **Complaints**

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act, you may contact our complaints officer using one of the methods set out below.

We will acknowledge your complaint within seven days and aim to resolve the complaint as quickly as possible. We will provide you with a decision on your complaint within 30 days.

We may also keep a record of your complaint, including your personal information and the subject matter of your complaint for the purpose of improving our customer service experience and our website.

If you are dissatisfied with the response of our complaints officer you may make a complaint to the Privacy Commissioner who can be contacted at [www.oaic.gov.au](http://www.oaic.gov.au) or 1300 363 992.

### **Contact details**

You may contact us in one of the following ways:

Email:            [rose.read@stewardshipexcellence.com.au](mailto:rose.read@stewardshipexcellence.com.au)

Mail:             Product Stewardship Centre of Excellence Limited

PO Box 7052

Berrima, NSW 2577

Website:        using one of the methods described on the [Contact Us](#) page of our website.

### **Further information**

You may request further information about the way we manage your personal information by contacting us.

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices. As a consequence we may change this Privacy Policy from time to time or as the need arises. We will post any changes to this Privacy Policy on our website.

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