

## DETECTOR INSPECTOR PRIVACY POLICY (the Privacy Policy)

You have come through to a website which is owned or operated by either of the following entities: Detector Inspector Pty Ltd (ACN 118 191 727), Detector Inspector (Tas) Pty Ltd (ACN 602 591 202), Detector Inspector (Vic) Pty Ltd (ACN 602 592 110) or Detector Inspector (NSW) Pty Ltd (ACN 602 592 754).

In this Privacy Policy, “we” “us” or “our” refers to either one or all of the above entities collectively.

We have developed this Privacy Policy to inform you of how we take steps to both respect your privacy and to protect the personal information that we collect, use, disclose and keep secure. It also covers how we make the personal information that we hold available for access to and correction by you, and has been drafted in accordance with our obligations under the *Privacy Act 1988* (Cth) and the **Privacy Amendment (Enhancing Privacy Protection) Act 2012** which includes the Australian Privacy Principles (collectively, **the Privacy Act**).

Personal Information when used in this Privacy Policy has the meaning given to it in the Privacy Act but it generally means any information that can be used to personally identify you. For example, your name, gender, contact details (including phone numbers and email addresses), age and possibly financial information, including your credit card, direct debit or PayPal account information. The personal information may be collected through our website, over the phone, or otherwise.

Please take a few minutes to review this Privacy Policy. By using our website, you are consenting to the collection, use and disclosure of your personal information and sensitive information as set forth in this Privacy Policy.

### 1. COLLECTION OF YOUR INFORMATION

- 1.1 We collect personal information about customers, prospective customers and website users which is reasonably necessary for, or directly related to, one or more of our functions or activities.
- 1.2 An example of the personal information that we might collect from you includes [your name; your postal address or street address; your age or date of birth; your profession, occupation or job title; your contact number; information you provide to us from any customer surveys that we may conduct from time to time; information that you might provide to us through the use of our website; and details of any products or services that you purchase from us and enquired about and any additional information necessary to fulfil your request for those products and services].
- 1.3 We will collect personal information from you only if it is reasonably practicable to do so. We may also collect information from you (including your personal information) from other sources, including your real estate agent or property manager who engages us to provide you with the services required.

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- 1.4 At or before the time we collect personal information about you from you (or if that is not practicable, as soon as practicable after collection of the personal information) we will take such steps as are reasonably practicable in the circumstances to ensure that you are aware of:
- (a) our identity, and how to contact us;
  - (b) the fact that you are able to gain access to the information, how to access personal information and seek correction;
  - (c) the purposes for which the information is collected;
  - (d) organisations (or the types of organisations) to which we usually disclose information of that kind;
  - (e) any law or a court or tribunal order that requires the particular information to be collected;
  - (f) the main consequences (if any) for you if all or part of the information is not provided or collected;
  - (g) how to make a complaint about our handling of your personal information and how we will deal with the complaint; and
  - (h) whether we are likely to disclose personal information about you to overseas recipients and, if it is practicable, the country such recipients are likely to be located.
- 1.5 We may be required from time to time to collect Sensitive Information from you, but will not collect Sensitive Information from you without your consent. Sensitive Information is given its meaning in the Privacy Act but generally includes information or an opinion about an individual's racial or ethnic origin, health information or political/ philosophical beliefs.

Cookies and Other Technologies

*General*

- 1.6 Subject to our obligations under the Privacy Act, when you visit any of our websites or use any of our applications or related digital properties (individually and collectively, "Services") we may collect information about your usage and the Services performance.

Such information may include your browser type, operating system, IP address, and the referring domain name from which you access this site (e.g. www.google.com).

We may collect information about your browsing behaviour, such as the number of times you have visited, the date you visited and the amount of time you spent using our Services.

We may also receive anonymised data about performance and errors that occur while you use our Services.

The information collected pursuant to this point 1.5 is used solely for our internal purposes in managing our Services and improving their functionality and reliability, as

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well as to assist us in better targeting interactive advertising, thereby enhancing customer support and site usability.

The collection of such information, whether by us or by data aggregators, is subject to the terms set forth in this Privacy Policy.

*Advertising information*

- 1.7 We may track your response to our advertisements, e-mails and content, determine your ability to receive HTML-based e-mail messages, learn how many users open an e-mail and allow our service providers to compile aggregated statistics about an e-mail campaign that we are running. This information may be shared, only when anonymised, with third parties to assist them in understanding the performance of advertising in our Services.
- 1.8 To conduct these or other activities, we or our service providers sometimes may use cookies or other forms of local device storage to help us provide our Services to you, and to help us collect information.

**2. HOW WE USE YOUR INFORMATION AND WHEN WE MAY DISCLOSE IT**

- 2.1 We collect personal information from you so that we can carry out our business activities and functions as well as to provide you with a high standard of customer service. In order to do this, we collect, hold, use and/or disclose your personal information for the following primary purposes:
  - (a) to provide you with the products and services ordered from us (including booking and confirming scheduled services of your smoke alarm systems) or providing you with news, information or advice about our existing or new products and services;
  - (b) to answer your inquiry and communicate with you generally, including by email, mail or telephone;
  - (c) to send you additional materials relating to us and services that may be of interest to you;
  - (e) to provide your updated personal information to us, our contractors or third party service providers;
  - (f) to investigate any possible breaches by you of any of our terms and conditions; and
  - (g) to otherwise provide you with effective customer service.
- 2.2 We also hold personal information which we use and/or disclose for purposes other than our primary purposes ("secondary purposes"). You provide your consent to us using your personal information for the following secondary purposes:
  - (a) billing and account management;
  - (b) business planning and product development;

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- (c) providing you with relevant information, including promotions, about our products and services, the products and services of our related bodies corporate and/or the products and services of our business partners or joint venturers;
- (d) enabling us to better understand your needs and interests;
- (e) improving the content, functionality and usability of our website;
- (f) improving our marketing and promotional efforts;
- (g) displaying personalised advertising when you visit our website;
- (h) for any other purpose identified in any other agreement between you and us;
- (i) issues, news or other information relevant to your dealings with us, or about us generally, or the industries in which you or we operate; and
- (j) as otherwise described in this Privacy Policy.

2.3 We may also use and/or disclose your personal information for any secondary purpose not included in this Privacy Policy if we are permitted to do so under the Privacy Act, particularly if such purpose is related to one of the primary purposes described in point 2.1 or you would otherwise reasonably expect that we would use the information for that secondary purpose.

2.4 In accordance with the Privacy Act, please note that we may use and/or disclose personal information without your consent for those reasons described in the Privacy Act, including reasons relating to the protection of public safety or the avoidance of an imminent threat to an individual's life.

2.5 From time to time we may also disclose your personal information to those bodies described in point 2.6 below in order to assist us to deliver the services you require. These organisations carry out, amongst other services, our:

- (a) billing and debt- recovery functions;
- (b) customer inquiries;
- (c) information technology services;
- (d) marketing services (including market research);
- (e) product delivery services;
- (f) the operation of our website and fulfilment of your requests and orders;
- (g) website usage analysis; and
- (h) the support or facilitation of any of those activities described in points 2.1 and 2.2.

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We will take reasonable practicable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

- 2.6 Some of the parties that we may disclose your Personal Information to include our employees, related bodies corporate; contractors; existing or prospective real estate agents or property managers who you may or may not have engaged to manage your property; our business partners or joint ventures; our sponsors or promoters of any competition that we conduct via our services; specific third parties authorised by you to receive information from us; and any other body for those reasons described in point 2.5 above.
- 2.7 This Privacy Policy does not cover the information practices of third parties (including real estate agents or property managers who you may or may not have engaged to manage your property) whose websites may be linked to our website or services and we are not responsible for the collection and use of your personal information by such third parties. Please refer to the privacy policies and statements of those service providers and obtain information regarding their collection, use and disclosure policies. Certain providers may have facilities that are located in a different jurisdiction to either you or us. If you elect to proceed with a transaction that involves the services of a third-party service provider, then your personal information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

**3. DIRECT MARKETING**

We may send you direct marketing communications and information about products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, over the phone, via SMS or via email, in accordance with applicable marketing laws, such as the *Spam Act 2004* (Cth) and the *Do Not Call Register Act 2006* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

In addition, at any time, you may opt-out of receiving marketing communications from us by contacting us (details provided in point 11 below) or by using the prominently displayed opt-out facilities provided (e.g. an unsubscribe link), or by updating your personal details on our website using the link provided on this page (if available). We will then ensure that your name is removed from our mailing list.

If you receive communications from us that you believe has been sent to you other than in accordance with this policy, or in breach of any law, please contact us using the details provided in point 11 below.

**4. ENSURING INFORMATION IS ACCURATE AND UP-TO-DATE**

We take reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete, relevant and up-to-date.

However, the accuracy of that information depends to a large extent on the information you provide. That's why we recommend that you:

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

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- keep us up-to-date with changes to your personal information such as your name or address. You may change your personal details by using the relevant facility on our website or by contacting us care of the contact details provided in point 11.

### 5. HOW WE PROTECT YOUR INFORMATION

- 5.1 We will take reasonable steps to protect the personal information from misuse, interference, loss and unauthorised access or disclosure. This may include taking reasonable steps to destroy or permanently de-identify personal information once it is no longer needed for any purpose for which the information may be used or disclosed.
- 5.2 We will not attempt to match de-identified or anonymous data collected through surveys or such online devices as "cookies", with information identifying an individual, without the consent of the relevant individual.
- 5.3 We require our employees and contractors to perform their duties in a manner that is consistent with our legal responsibilities in relation to privacy, including those in this Privacy Policy. We note that we take reasonable steps to ensure that personal information is only accessible by people who have a genuine "need to know" as well as "right to know."

### 6. HOW YOU CAN ACCESS OR CORRECT YOUR INFORMATION

- 6.1 We will permit records containing your personal information to be accessed by you when you contact us c/o the contact details at point 11 below. We may, however, refuse to provide you with access to your personal information if, for instance, granting you such access would pose a serious threat to your life or to the health and safety of any individual or have an unreasonable impact on the privacy of any other individual.
- 6.2 If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.
- 6.3 If you:
- (a) wish to lodge a request to access and/or correct your Personal Information; or
  - (b) have been refused access to your Personal Information by us for any reason described in this Policy and you wish to challenge that refusal;
- you may do so by contacting the office of Detector Inspector's Privacy Officer as per the details in in point 11. The procedure for challenging such a refusal is also set out in point 11.
- 6.4 We will not normally charge a fee for processing an access request unless the request is complex or is resource intensive. We do, however, reserve the right to charge an administration fee if an individual requests access to their personal information more than once in a three month period.

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- 6.6 Where we offer online account management facilities, customers can use this capability to control aspects of their account, including amending or updating certain personal information.

**7. OPENNESS**

The office of Detector Inspector's Privacy Officer will be the first point of contact for inquiries about privacy issues. If you wish to make an inquiry or complaint regarding privacy you should do so by contacting this office as per the details in Point 11.

**8. STAYING ANONYMOUS**

- 8.1 We will not make it mandatory for visitors to our website to provide personal information unless such information is required to answer an inquiry or provide a service. We may, however, request visitors to provide personal information voluntarily to us (for example, as part of a competition or questionnaire).

- 8.2 We will allow our customers to transact with us anonymously or by using a pseudonym wherever that is reasonable and practicable.

**9. TRANSFERRING INFORMATION OVERSEAS**

- 9.1 We will only transfer personal information about an individual to someone who is in a foreign country if:

- (a) we reasonably believe that the recipient of the information is subject to a law, or binding scheme, which effectively overall upholds principles for protection of the information that are substantially similar to the Australian Privacy Principles, and there are mechanisms that an individual can access to take action to enforce that law or binding scheme;
- (b) we have taken such steps as are reasonable in the circumstances to ensure that the information which it has transferred will not be held, used or disclosed by the recipient of the information inconsistently with the Australian Privacy Principles; or
- (c) the individual has been expressly informed that if they consent to the transfer, paragraph 9.1(a) will not apply, and the individual consents to the transfer.

**Note:** By engaging us, you consent to the transfer of information to someone who is in a foreign country, even if paragraph 9.1(a) does not apply, in circumstances where:

- (i) we consider that it is necessary for us to do so in order to properly provide you with the required services, including by confirming an appointment or responding to your queries with respect to your engagement of us;
- (ii) the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between us and a third party;
- (iii) all of the following apply:
  - (A) the transfer is for the benefit of the individual;

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- (B) it is impracticable to obtain the consent of the individual to that transfer; and
- (C) if it were practicable to obtain such consent, the individual would be likely to give it.

## **10 CHANGES TO THE PRIVACY POLICY**

We may update this Privacy Policy at any time and from time to time. Any changes will be effective when posted on this website. Your continued use of the website will indicate your acceptance of any changes to the Privacy Policy. All personal information, collected both before and after any changes take effect, will be subject to the terms of the revised policy (for which you will be taken to have provided consent) unless you indicate otherwise by contacting the office of Detector Inspector's Privacy Officer as per the details in Point 11. We urge you to refer back to this page regularly and especially prior to providing us with any personal information.

## **11 CONTACT US**

If you have any questions about this privacy policy, any privacy related dealings with us or a possible breach of your privacy or would like further information about our information management practices, you can contact Detector Inspector's Privacy Officer, care of the following details:

Privacy Officer  
Detector Inspector  
PO Box 542  
Elsternwick Vic 3185  
Phone 1300 134 563  
Fax (03) 9532 8894  
Email: [info@detectorinspector.com.au](mailto:info@detectorinspector.com.au)

Once the Privacy Officer receives a complaint from you, the Privacy Officer will within a reasonable time after receiving the complaint begin investigating the complaint. In investigating the complaint the officer may use additional resources within our organisation to determine the nature of the complaint. We may contact you during this investigation if necessary. If a breach is found, the Privacy Officer will escalate the matter to management to ensure that the process which caused the breach is remedied. We will also contact you to inform you of the outcome of the investigation within a reasonable time after the conclusion of the same. We will treat your complaint during the investigation period confidentially and aim to resolve your complaint in a timely fashion and a satisfactory manner.

This policy was last updated on 13/09/2016