

## Privacy Policy

This Policy was last updated on 5 April 2019.

Sharpe Group Pty Ltd, with ABN 16 067 079 636, (“**we**”, “**our**” or “**us**”) are committed to protecting the personal and credit related personal information (“**credit information**”) that we may collect and hold about you. This Policy sets out our policies relating to management of your personal information and credit information. These policies are based on our obligations under the *Privacy Act 1988* (Cth) (“**Act**”) (including Australian Privacy Principles (“**APPs**”) and Part IIIA (Credit reporting)).

By voluntarily supplying us with your personal or credit information, you are agreeing to be bound by this Policy.

Any amendments to this Policy will be notified to you by posting an updated version on our website.

Please note that our website contains links to other websites. When a user has clicked on a link to another site, they leave our site and are no longer protected by this Policy.

### **Collection of personal information**

The personal information we may collect and hold about you includes:

- your first name and last name;
- your email address;
- your phone number;
- your postal address;
- your gender and age;
- your employment status;
- your energy bills, and;
- if you are a homeowner or renter.

We will not seek sensitive personal data from you, such as health details or information revealing your religious beliefs or ethnic origin.

### **Cookies**

We may use “cookies” or similar technologies to collect data. A cookie is a small file, typically of letters and numbers, downloaded on to a device when you access our website. Our website collects the following information from users:

- your server address;
- your top level domain name (for example, .com, .gov, .au etc);
- the date and time of your visit to the site;
- the pages you accessed;

- the previous site you have visited, and;
- the type of browser you are using.

### **Means of collection of personal and credit information**

Your personal and credit information may be collected in a number of ways, including:

- directly by our staff when you enquire about our services
- directly by our staff during or after completion of our services, or;
- when you use our website or complete a form on our website.

In some circumstances, where it is unreasonable or impracticable to collect information from you, we may collect information about you from a third party source. For example, we may collect information from a publicly maintained record.

In addition to the methods above, we may collect credit information from other credit providers, subject to any restrictions at law.

You need not provide all the information requested by us, but this may prevent us from providing some or all of our goods or services to you.

### **Use, disclosure & purpose**

We collect, hold and disclose your personal and credit information for the following purposes:

- as a necessary part of providing our goods and services to you;
- to promote and market our products and services to you or provide you with information that we believe may be of interest to you (unless as directed otherwise);
- to personalise and customise your experiences with our website;
- to help us research the needs of our customers and to market our goods and services with a better understanding of your needs and the needs of customers generally;
- to allow us to provide advertising material to you regarding us, our clients, and other business partners (unless as directed otherwise); and
- other purposes related to any of the above.

We will only use your information for the purposes for which it was collected (“**primary purposes**”) or a purpose related to the primary purpose, if this use would be reasonably expected by you, or otherwise, with your consent.

We may disclose your information to necessary third parties, who assist us to provide, manage and administer our goods and services. Information provided to third parties will be dealt with in accordance with that entity’s privacy policy. People we may disclose your information to include:

- third parties that provide goods and services to us or through us;

- third parties, such as marketing and digital agencies, who may send to you our e-newsletters on our behalf; or
- our website host or software application providers.

We do not disclose your personal information to overseas recipients.

### **Quality, access to & correction of information**

You are entitled to have access to and seek correction of any personal information that we may hold about you. We require that requests for access to or to update or correct your personal information to be in writing outlining the details of your request. Such requests should be addressed to the Privacy Officer via the details provided in this Policy.

We will take appropriate steps to verify your identity (or verify that you act as an authorised agent of the individual concerned) before granting a request to access your personal information.

We will respond to your request for access to your personal information within a reasonable time after you make the request and if access is granted, access will be provided within 30 days from your request. We will, on request, provide you with access to your personal information or update or correct your personal information, unless we are lawfully excluded from granting your request, including if:

- giving access would be unlawful;
- we are required or authorised by law or a court/tribunal order to deny access; or
- giving access is likely to prejudice one or more enforcement related activities conducted by an enforcement body.

Where your request for access is accepted, we will provide you with access to your personal information in a manner, as requested by you, providing it is reasonable to do so.

Your request for correction will be dealt with within 30 days, or such longer period as agreed by you. If we deny your request, we will provide you with a written notice detailing reasons for the refusal and the process for making a complaint about the refusal to grant your request.

We will accept your request for correction of your credit information where we are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading.

Upon accepting a request for correction of your personal information, we will take all steps that are reasonable in the circumstances, having regard to the purpose for which your information is held, to correct your personal information.

If your request for correction of credit information is accepted we will provide written notice of this correction to any entity to which we have disclosed this information previously, to the extent that this is practicable.

### **Online Advertising**

We use Google Adwords remarketing to advertise our products and services across the Internet. Google Adwords remarketing will display relevant ads tailored to you based on what parts of our website you have viewed by placing a cookie on your machine. This cookie does not identify you or give us access to your computer. The cookie allows us to determine which section of our website you are viewing to display ads that are relevant to you. Google Ads Remarketing allows us to tailor our marketing to better suit your needs.

If you do not wish to participate in our Google AdWords remarketing, you can opt out by visiting Google's Ads Preferences Manager. You can also opt out of any third-party vendor's use of cookies by visiting [www.networkadvertising.org/choices/](http://www.networkadvertising.org/choices/)

### **Storage and Security**

Your personal and credit information will be stored as physical files in a secured area, on our servers and on computers with appropriate backup and security systems. Any personal or credit information which is collected via our website, or which is held on our computer system or software, is protected by safeguards including physical, technical and procedural methods.

We take reasonable steps to hold information securely in electronic or physical form. We are committed to keeping secure the data you provide to us and we will take all reasonable precautions to protect your personally identifiable information from loss, misuse, interference, unauthorised access or alteration.

We aim to achieve this through:

- imposing confidentiality requirements & procedures on our employees;
- implementing policies in relation to document storage security;
- implementing security measures to govern access to our systems;
- only providing access to personal information once proper identification has been given;
- controlling access to our premises, and;
- implementing website protection measures.

### **Dealing with us anonymously**

Where lawful and practicable to do so, you can deal with us anonymously or using a pseudonym. You can deal with us anonymously or using a pseudonym when making a general enquiry about the goods and services that we can offer to you including via telephone or our website.

At the time you purchase our goods or engage our services, it is no longer practicable for you to deal with us anonymously or using a pseudonym.

### **Credit Information Notifiable Matters**

In accordance with our obligations under the Privacy Act, we set out the following notifiable matters in relation to any of your personal or credit information disclosed by us to a credit reporting body for the purposes of disclosing payment default information in relation to credit provided to you:

- In connection with the provision of credit, we may disclose your personal and credit information to the following credit reporting bodies for the purposes of disclosing payment default information.

### **Complaints**

If you believe that we have breached a term of this Policy or the Act you may submit a written complaint. The written complaint can be emailed or posted to us using our contact details set out below. You must include your own contact details so we can respond to your complaint.

Our relevant staff will consider your complaint and respond within 30 days from receiving the complaint.

If you are unsatisfied with the outcome of your complaint you may refer your complaint to the Office of the Australian Information Commissioner to be resolved.

### **Contact us**

If you wish to:

- gain access to your personal information;
- make a complaint about a breach of your privacy;
- contact us with a query about how your information is collected or used;
- contact us regarding any other matter concerning this Policy; or,
- stop receiving direct marketing from us,

then you can speak directly with our staff who will do their best to try to resolve your issue as efficiently as possible.

Our contact details are as follows:

Phone: **131 750**

Email: **general@ers-sa.com.au**

Postal address: **28 Walsh Street, Thebarton, SA 5031**