1. Intent

ATF Services Pty Ltd (ACN 060 402 048) ("ATF") and its subsidiaries are bound by the Australian Privacy Principles, which are set out in schedule 1 of the Privacy Act 1988 (Cth). The Australian Privacy Principles can be found at https://www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles.

2. Scope

This Policy applies to personal information collected by ATF and its subsidiaries.

This Policy will commence operation from the "Date Issued" date in the panel below. It replaces all previous ATF privacy policies.

3. Definitions

'Personal information' is information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

'Sensitive information' is information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual orientation, criminal record and health information.

'Consent' means any freely given, specific, informed and unambiguous indication of the data subject wishes by which they, by statement or by clear affirmative action, signifies agreement to the processing of personal information or sensitive information.

4. Collection

ATF will only collect personal information (other than sensitive information) by lawful and fair means (including via ATF's app), and if the information is reasonably necessary for, or directly related to, one or more of ATF's functions or activities including the supply of goods or services by ATF. ATF will take reasonable steps to ensure that the individual is aware that information is being collected and, should they require access to information collected, shall provide access subject to reasonable request.

We usually collect personal information such as your name, address, telephone number and, in some cases, financial details. We may collect personal information from publicly available sources.

As a general rule we do not usually collect sensitive information. However, if we do, it will be where the information is reasonably necessary for the purposes of providing our services and we will seek your consent to collect it.

We collect personal information when we provide our services to you. Generally we will tell you why we are collecting information when we collect it and how we plan to use it and hold it, or these things will be obvious when we collect the information.

Sometimes we collect personal information from a third party if you have consented or would reasonably expect us to collect the information in this way, for example from publicly available sources such as websites or telephone directories. If we receive personal information which we did not solicit we will within a reasonable period after receiving the information, determine whether or not we could have collected the information under Australian Privacy Principle 3 if we had solicited the information. If it should not have been solicited and is not contained in a Commonwealth record, we may destroy the information or ensure that the information is de-identified.

We intend to rely upon the employer exemption relating to employee records to the extent that it applies.

You are not required to provide us with any personal information when visiting our website. However, sometimes we need to collect your information from our website to provide services that you request.

We do not collect personal information about you if you only browse our website. Our website only uses session cookies during a search query of the website. When you close your browser the session cookie is destroyed, and no personal information is kept which might identify you to us in the future.

5. Use and Disclosure

ATF will only use the provided information for the purposes for which you give it to us, to provide our services to you, to fulfil administrative functions associated with these services (for example assessment of credit worthiness), to enter into contracts with you or third parties, for marketing (including direct marketing) and client relationship purposes and for related, internal management purposes. If we use your personal information for any other purpose, we will first obtain your consent before we use your personal information, unless we are required or permitted by law to do so without obtaining your permission.

We may disclose your personal information to our related bodies corporate, service providers and contractors from time to time to help us to provide and market our services to you. If we do this, we generally require these parties to protect your information in the same way we do. You may request not to receive direct marketing communications from ATF by contacting our Group Manager Operational Services & Compliance.

Sometimes, we may send your information overseas (for instance, to our foreign related bodies corporate or to store data via a cloud service). If we need to disclose personal information to overseas recipients, we will comply with the APPs in disclosing your personal information overseas including taking such steps as are reasonably necessary in the circumstances to ensure that the overseas recipient does not breach the APPs.

6. Data Quality

ATF will take reasonable steps to ensure that the data collected, used or disclosed is accurate, complete and up to date.

7. Data Security

ATF will take reasonable steps to protect personal information it holds from unauthorised access, modification or disclosure and also against misuse, interference and loss.

ATF will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used or disclosed.

We use a variety of physical and electronic security measures [including restricting physical access to our offices and firewalls and secure databases to keep personal information secure from misuse, loss or unauthorised use or disclosure].

The Internet is not a secure environment. If you send us information, including your email address, it is sent at your own risk.

8. Access and Correction

Generally you have a right to access most personal information we hold about you and if we deny access in some circumstances, we will tell you why. Subject to a reasonable request being made, you have a right to seek correction of your personal information by ATF.

9. Sensitive Information

ATF will not collect sensitive information about an individual unless the individual has consented, or the collection is required by law.

10. Changes to our Privacy Policy

We reserve the right to amend this Policy at any time by uploading the updated Policy to our website. You may also obtain a copy of the current version of our Policy by contacting us. We encourage you to read our Policy each time you deal with us so that you are aware of any changes made to it.

11. Important Information:

If you would like more information about our approach to privacy, please contact our Head Office on (02) 8860 8114.

Our Office is bound by the Information Privacy Principles of the Privacy Act 1988.

Our website follows the Privacy Commissioner's Guidelines for Federal and ACT Government Websites.

Please contact our Group Manager Operational Services & Compliance to ask for access to your information or if you have a complaint concerning your information privacy.

If you would like more information about our approach to privacy, please contact our Group Manager Operational Services & Compliance.

12. Privacy Complaint Handling

This Privacy Complaint Handling Procedure sets out the process we will undertake to deal with complaints regarding breaches of Australian privacy law including under the Privacy Act.

If you believe that a breach of your privacy has occurred or you otherwise have a complaint about our use or management of your personal information, we encourage you to contact the Group Manager Operational Services & Compliance at PO Box 7001, Seven Hills NSW 2147 or by email at privacy@atfservices.com.au. Your complaint will be considered and dealt with by our Privacy Officer. Please allow us a reasonable time to respond to your complaint. If you are not satisfied with our resolution, you may make a complaint to the Office of the Australian Information Commissioner whose contact details can be found at https://www.oaic.gov.au/.

ATF Services will resolve privacy complaints through this procedure:

- A privacy complaint is received ("Complaint")
- Within 10 business days following receipt of the Complaint, ATF Services will send a communication via post or email to the person who made the complaint ("Complainant") acknowledging receipt of the Complaint.
- Following the acknowledgement of receipt of the Complaint, the Group Manager – Operational Services & Compliance will investigate the Complaint. During this process a request for further information may be made to the Complainant.
- Within 45 business days from the date all information is received, the Group Manager – Operational Services & Compliance will notify the Complainant of proposed avenues of resolution. The Complainant and the Group Manager- Operational Services & Compliance may work together to collaboratively resolve the Complaint to the Complainant's satisfaction.
- The Group Manager – Operational Services & Compliance will notify the Complainant if additional time is needed to respond due to the complexity of the inquiry.
- In circumstances where resolution cannot be achieved in accordance with the above, the Group Manager – Operational Services & Compliance will advise the Complainant that they may direct their Complaint to the Federal Privacy Commissioner or take independent advice as to their rights.

The following are situations where ATF may decline to deal with a complaint:

- The complaint does not concern the personal information of the complainant.
- The complaint concerns the personal information of a child and the person making the complaint is not the parent or guardian of the child.
- The complaint concerns the personal information of an individual and the person lodging the complaint is not an agent of the individual authorised to act on the individual's behalf.