Privacy Policy

Tasmanian Independent Retailers Co-Operative Society Limited (ABN 89 743 048 843)
("Tasmanian Independent Retailers")

The latest version of this policy is published online at www.igatas.com.au and www.tir.com.au and available by contacting our Privacy Officer by email or at the address detailed below.

Tasmanian Independent Retailers is committed to ensuring your privacy is protected. We are bound by the Australian Privacy Principles (APPs) as contained in the Privacy Act 1988 (Cth) (the Privacy Act).

In this policy "**we**," "**our**" or "**us**" means **Tasmanian Independent Retailers** We refer to an individual as **you**.

This policy explains how we comply with the APPs when collecting, using, disclosing, storing, and destroying your personal information. It also explains how you can access or correct personal information we hold about you and what you can do if you think your privacy has been breached.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this policy and any other arrangements that apply between us. We may change our policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current policy.

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What personal information does this policy cover?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable. For example, this may include your name, age, gender, postcode, and contact details. It may also include financial information, including your credit card information.

Personal information may include **sensitive information** about the individual such as racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health, genetic or biometric information.

We also have a credit information privacy policy available at https://tir.com.au/credit-privacy-policy which explains how we manage information related to the provision of credit.

What personal information do we collect?

We only collect personal information that is necessary for our functions or activities. We will ensure you are aware when we collect your personal information and the primary purpose of its collection. We will only collect sensitive information with your consent or where permitted by the Privacy Act.

There may be consequences if you do not provide us with all information sought from you. We will let you know what those consequences are when requesting the information. If you provide us with more information than we have requested, we will destroy it unless it is necessary for our functions or activities.

The type of information we collect will depend on your dealings with us. This information may include:

- name, address(es) telephone number(s) and other contact details;
- age or date of birth (if required to comply with age restrictions);
- associated company name(s), position, occupation, and other business details;
- credit card information;
- electronic address(es) including your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address, and standard web log information; and
- transaction details relating to your use of our products, service, or benefits.

From time to time, you may provide us, and we may collect from your personal information of a third party (for example, for delivery purposes). Where you provide the personal information of a third party, it is your responsibility to ensure that those persons are aware of this policy, understand it and agree to accept it.

We will not collect sensitive information from you or any third party. Tasmanian Independent Retailers allow anonymity and pseudonymity where reasonable, in accordance with APP 2.

You do not have to provide us with any personal information, however if you do not do so we may not be able to complete a transaction you have entered into, finalise payment of a product or service you have

ordered, make delivery of a product you have ordered, validate your entry in a promotion, or otherwise provide you with the products, services or benefits you have requested.

How do we collect personal information?

We generally collect personal information directly from you:

- when you personally submit information through any of our websites or apps (including via cookies);
- in person (such as in store);
- in the course of recruitment;
- when you enter into a promotion conducted by us or a third party;
- when you complete a survey;
- in the course of us providing you with a requested product, service, or benefit; or
- when you have other dealings with us.

We may also collect information through third party services (such as applications on your device which link or share information to our websites or apps).

How do we use your personal information?

We will use your personal information for the purpose for which we collected it. This may include (but is not limited to) use to enable you to access and use our websites or apps or to provide you with a requested product, service, or benefit. We may also use your personal information for related purposes which you would reasonably expect. We will take reasonable steps to ensure the information we use is accurate, up-to-date, complete, and relevant, having regard to the reasons why it is being used.

Sensitive information will be used and disclosed only for the purpose for which it was collected, a directly related secondary purpose, with your consent or as required or allowed by law.

What about direct marketing?

We may use your personal information for the purpose of direct marketing to you where you have opted in or you would reasonably expect this. We will not share your personal information with third parties unless you have agreed to do so.

We may provide you with information about relevant products and services offered by us or third parties who provide services to us. The direct marketing may relate to:

- our products and services;
- the products and services of other parties;
- promotions run by us or other parties; or
- to keep you informed of new developments we believe may be of interest to you.

You may opt-out of receiving direct marketing materials from us or third parties by contacting us or through the unsubscribe function that will be included in each direct marketing communication.

Using our website and cookies

We may collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone, or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser, but our websites may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this policy.

To whom do we disclose personal information?

We may disclose personal information for the purposes described in this policy to our employees and related bodies corporate. If you have authorised or directed us to do so, your personal information may also be shared with our members, Statewide Independent Wholesalers, and any relevant related bodies corporate so we can provide our services. A list of our current members can be obtained by contacting the TIR Company Secretary. If your personal information is disclosed to our members, it will be handled in accordance with the privacy policy of the member with whom it is shared.

Your personal information may also be disclosed to our service providers or professional advisors where necessary for our activities, for example to IT service providers, accountants, auditors, lawyers, or insurers.

We will take reasonable steps to ensure the personal information we disclose to others is accurate, up-to-date, complete, and relevant, having regard to the reasons why it is being disclosed.

Links on our website

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our policy, and we encourage you to read them before using those websites.

Do we send personal information overseas?

We do not disclose your personal information to organisations overseas. However, your personal information may be stored on overseas data servers. Digital information we hold is stored on servers within Australia, European Union, and North America.

When you provide your personal information to us, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that overseas recipients handle that personal information in compliance with the Privacy Act. We will, however, take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the APPs.

How do we store personal information?

Personal information is stored electronically, on paper, or both. We take reasonable steps to protect the security of personal information including the physical security of our premises and use of access level permissions and passwords to restrict access to electronic records.

Please be aware that sending personal information by email or through our website or apps may not be secure. We take reasonable steps to protect your personal information from cyber security risks but cannot guarantee the security of any information stored on our websites, apps, or databases. If you are concerned about the security of email, you should arrange an alternative delivery method for the information, for example by registered post or encrypted email.

Additionally, we take reasonable steps to destroy or permanently de-identify personal information when we no longer need it.

What happens if your personal information is accessed without authorisation?

We are bound to comply with the notifiable data breach (NDB) scheme under the Privacy Act and must notify you as well as the Office of the Australian Information Commissioner (OAIC) when a data breach is likely to result in *serious harm* to you. A data breach could involve different forms of unauthorised access or disclosure of personal information, including for example:

- personal information that is held on a device being lost or stolen;
- hacking of websites, apps, or other databases where personal information is stored; or
- personal information mistakenly disclosed to the wrong person.

Not all data breaches will constitute an eligible data breach for the purposes of the Privacy Act. In the event of a breach, we will make an assessment to determine whether it constitutes an eligible data breach and will handle the breach accordingly.

If your personal information is breached and meets the threshold requirements for the NBD scheme (i.e. it is an eligible data breach) or we are directed to do so by the OAIC, we will notify you and advise our recommendations about the steps you should take in response to the data breach to protect your privacy and minimise harm to you. Notification may be in the form of direct correspondence to you, or if it is not practicable to notify affected individuals directly, then we may notify you by publishing information on our website. If we publish on our website, we will also take reasonable steps to publicise the information to comply with our obligations under the Privacy Act and increase the likelihood of you being made aware of the breach and actions you can take to minimise harm.

How can you access personal information we have about you?

You may at any time request access to your personal information and, subject to any exemptions in the APPs applying, we will give you access by providing you with copies of or allowing you to inspect the requested personal information.

We may charge you a reasonable fee to access that information, for example to recover the costs of photocopying or if we have to spend a significant amount of time to provide you with access. We may need to verify your identity before providing access to your personal information.

If we refuse you access to your personal information, we will provide you with an explanation for that refusal. We will try to provide you with access to your personal information within 14 days of receipt of your written request for access or 30 days where responding to the request is more complicated.

What if your personal information is not correct?

We will take reasonable steps to ensure your personal information held by us is up-to-date, complete, and accurate. If your personal information changes or you believe our records are not up-to-date, complete, and accurate please contact us. If we agree the information needs correcting, we will take reasonable steps to correct that information.

If we do not agree the information needs correcting, you can ask us to put a statement on your file explaining what you say needs to be corrected.

If we refuse to correct your personal information, we will provide you with a written explanation for that refusal. We will try to resolve all requests within 14 days of receipt of your written request or 30 days where the matter is more complicated. We may charge you a reasonable fee to correct that information, for example if we have to spend a significant amount of time to correct it.

When do we destroy personal information?

We securely destroy or de-identify personal information when it is no longer required. Information stored on databases, such as cloud services, may not be able to be destroyed once held on third party services.

How to contact us or make a complaint

If you have any questions or concerns about this privacy policy or our practices or wish to access or update information we hold about you, please contact our Privacy Officer in the first instance via the details listed below. If your concern related to a complaint, please submit it in writing and mark for the attention of the Privacy Officer. We will aim to consider and respond to your complaint within ten working days. If your complaint relates to credit services we provide, we will acknowledge and confirm within seven days of receipt how we propose to handle the complaint (for more information see our credit privacy policy available at https://tir.com.au/credit-privacy-policy). Our preference is to attempt to resolve the complaint with you directly prior to you taking the complaint any further.

Tasmanian Independent Retailers Co-Operative Society Limited
E-mail: privacy@tir.com.au
Post: Locked Bag 4 LAUNCESTON Tas 7250
Phone: 1300 557 0299

Is there anyone else you can complain to?

You can make a complaint about this policy, our handling of your personal information or interferences with your privacy to the Office of the Australian Information Commissioner. Their contact details are:

Email: enquiries@oaic.gov.au
Post: GPO Box 5218, Sydney NSW 2001
Phone: 1300 363 992
Fax: 02 9284 9666
Web: http://www.oaic.gov.au/