

ELTA GROUP ASIA PACIFIC (EGAP) COMPANIES

Privacy Policy

1. Purpose

The purpose of this privacy policy is to:

- clearly communicate the personal information handling practices of the Elta Group Asia Pacific (EGAP) companies, and
- give individuals a better and more complete understanding of the sort of personal information that the EGAP companies hold and how we handle that information.

2. Scope

This Privacy Policy applies to personal information collected by the all Elta Group Asia Pacific (EGAP) companies*.

This privacy policy has been developed to follow the 'layered policy' format, which means that it offers layers of greater or lesser detail so people can read as much as they wish and find what they need fast.

If all you want is an overview of our personal information handling practices, you can have a look at our Condensed Privacy Policy ([link](#)). This offers an easy to understand summary of;

- how we collect, use, disclose and store your personal information, and
- how you can contact us if you want to access or correct personal information we hold about you.

If, on the other hand, you are in search of a more comprehensive explanation of our information handling practices, then this policy will provide that information. This document forms the 'detailed' layer of our privacy policy.

Both this Privacy Policy and the Condensed Privacy Policy can be accessed on each businesses website and both were last updated February 2014.

3. Definitions

Australian Privacy Principles (APP) – means the 13 APP's which apply to all Australian organisations on the collection and use of personal information.

Personal Information - means information or an opinion (including information or an opinion forming part of a database), 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.

4. Personal Information Handling Practices

Collection

EGAP usually collect personal information about individuals directly from those individuals or their authorised representative/s.

EGAP sometimes collects personal information from a third party or from a publicly available source, but only if;

- the individual has consented to such collection or would reasonably expect us to collect their personal information in this way, or
- if it is necessary for a specific purpose such as the investigation of a privacy complaint.

In limited circumstances we may receive personal information about third parties from individuals who contact us and supply us with the personal information of others in documents they provide to us in the course of providing goods and services to those parties.

EGAP only collect personal information for purposes which are directly related to our business, provision of goods and services or activities under the *Privacy Act 1988* and only when it is necessary for, or directly related to, such purposes, including;

- when an individual contacts us asking for information on our goods and services
- when an individual asks to be on an email or mailing list relating to EGAP activities, goods and services
- when we collect personal information, including contact details, as part of the daily communication processes including, when individuals email, telephone or hand us their business cards, and
- when we collect personal information from individuals who supply that information by completing a subscription form (either on paper, electronically or by registering on our website) and submitting it to the business.

EGAP will ensure that all unsolicited personal information will be afforded the same privacy protection as solicited personal information.

Where unsolicited personal information is received EGAP;

- must determine whether it could have collected the information directly from those individuals or their authorised representative/s, and
- if EGAP could not have collected the information, then we will destroy or remove identifying components in the information as soon as practicable, but only if lawful and reasonable to do so.

Individuals have the option of not identifying themselves or of using a pseudonym when dealing with any EGAP businesses in relation to a particular matter.

Use and disclosure

EGAP only use personal information for the purposes for which we collected it — purposes which are directly related to one of our functions (such as the provision of quotations and/or goods), services or activities.

EGAP do not give personal information about an individual to Government agencies, private sector organisations or anyone else unless one of the following applies;

- the individual has consented
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies
- it is otherwise required or authorised by law

- it will prevent or lessen a serious and imminent threat to somebody's life or health, or
- it is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.

Data quality

EGAP takes steps to ensure that the personal information we collect is accurate, up-to-date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed and at other times as we become aware of any changes.

Data security

EGAP take steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure and against other misuse. The measures taken to protect personal information include password protection for accessing our electronic information, paper files being in locked cabinets and access restrictions.

When the personal information that we collect is no longer required, we will destroy or delete it in a secure manner.

Access and correction

When an individual requests access to the personal information we hold about them, or requests that we change that personal information, we will allow access or make the changes unless we consider that there is a sound reason under the Privacy Act or other relevant law to withhold the information and/or not make the changes.

EGAP will provide an individual with written notice if we refuse to correct the personal information as requested by the individual. The written notice will set out;

- the reason for refusal (unless this would be unreasonable)
- the mechanisms available to complain about the refusal, and
- any other matter prescribed by regulation.

If EGAP refuses to make a correction, and an individual requests that a statement be attached to the record stating that the information is inaccurate, out-of-date, incomplete, and irrelevant or misleading, we will attach this statement in a way that will make the statement apparent to users of the information.

EGAP will respond to a correction request within a reasonable period. We will not charge for making the request, for correcting the information or for associating any statement with the personal information.

Individuals can obtain further information about how to request access or changes to the information we hold about them by contacting us (see below "How to contact us").

If you are listed on one or more of our email lists you can opt out at any time. You can unsubscribe by using the 'unsubscribe' options noted in our emails.

Identifiers

EGAP will ensure that we adopt our own identifiers for personal information and will not adopt an identifier assigned by an agency, an agent of an agency acting in this capacity, or a contracted service provider for a Commonwealth contract acting in this capacity.

Disclosure to overseas organisations

EGAP will only transfer personal information to an organisation in a foreign country that are part of the Elta Group of companies and/or suppliers of goods and services to the Group, and then only if;

- we know that the recipient is subject to a law, binding scheme or contract which effectively upholds the principles for the fair handling of the information that are substantially similar to the APPs or
- the individual consents to the transfer or
- the transfer is necessary for the performance of a contract between the individual and EGAP (or related pre-contractual measures)
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between EGAP and a third party or
- the transfer is for the benefit of the individual, and it is impracticable to obtain the consent of the individual, and if it were practicable to obtain consent, the individual would be likely to give it or
- EGAP has taken reasonable steps to ensure that the information will not be handled by the recipient inconsistently with the APPs.

How to contact us

To obtain further information in relation to this privacy policy, or provide comments, please contact us on:

Email

privacyofficer@fantech.com.au

Facsimile

+61 3 9554 7877 attention Privacy Officer

Post

Privacy Officer, 42-62 Pound Road West, Dandenong South Vic 3175, Australia.

5. Information collected online

Collection

EGAP's usual practice is to collect information about all visitors to our online resources. The information is very limited and only used to identify generic behavioural patterns.

EGAP sometimes use third party platforms to deliver information. As these are sites hosted and managed by other organisations, before deciding if you want to contribute to any third party site you should read their privacy policy.

There are several methods used to collect visitor behaviours on each of our online platforms. We use Google Analytics on our websites. Information and data collected through Google Analytics is stored by Google on servers in the United States of America, Belgium and Finland.

You can opt out of the collection of information via Google Analytics by downloading the Google Analytics Opt-out browser add on.

When visiting any of our online resources, we may collect the following information about your visit for statistical purposes:

- server address
- top level domain name (for example .com, .gov, .au, .uk etc.)
- the date and time of your visit to the site
- the pages you accessed and documents downloaded during your visit
- the previous site you visited
- if you've visited our site before
- the type of browser used.

We record this data to maintain our server and improve our services. We do not use this information to personally identify anyone.

Cookies

Most of our online platforms use sessions and cookies. The core functionality on these platforms will be largely unaffected if you disable cookies in your browser but you may be unable to access some advanced functions.

Use and disclosure

EGAP do not give personal information collected online to other agencies, organisations or anyone else without consent. The only time this may occur without consent would be if the individual would reasonably expect, or has been advised, that information of that kind is usually passed to other agencies, organisations or individuals, or the disclosure is required or authorised by law.

Data quality

We will endeavour to delete or correct any personal information that we hold about you on request, see 'Data quality' above (section 4).

If you are on one of our email lists, you may remove yourself from further contact by clicking the 'unsubscribe' link at the bottom of the email.

Data security

In relation to our own servers, EGAP take all reasonable steps to manage data stored on our servers to ensure data security.

There are inherent risks in transmitting information across the internet and we do not control the security of information collected and stored on third party platforms.

Access and correction

For information about how to access or correct personal information collected on our website, see 'Access and correction' above (section 4).

6. Files - how we handle specific files containing personal information

6.1. Contacts Lists

Purpose

EGAP maintain contact lists which include contact information about individuals who may have an interest in our goods and services, activities, events and product information.

Collection

It is our usual practice to collect personal information in contact lists directly from individuals, for example, where they have asked to be added to a contact list.

Sometimes we may collect personal information from a third party or from a publicly available source, such as a website or telephone directory. We would usually only collect personal information in this way if the individual would reasonably expect us to, or has given their consent. For example, we might collect this information if we thought that the individual (or the organisation they work for) would like to receive information about our goods and services, activities, events and product information and we would only contact this individual in their work capacity.

Use and disclosure

EGAP only use personal information in contact lists for the purpose of providing goods and services to our customers, potential customers and other industry groups and bodies.

EGAP do not give personal information about an individual to other agencies, organisations or anyone else without consent. The only time this may occur without consent would be if the individual would reasonably expect, or has been advised, that information of that kind is usually passed to other agencies, organisations or individuals, or the disclosure is required or authorised by law.

EGAP may need to provide your contact details to delivery companies, mail houses, third party fulfilment contractors, financial institutions and web-hosting organisations, but we will not sell or transfer your information to a third party for marketing purposes without your consent. We may, in the ordinary course of our own business, use contact details to direct market our products and services, see 'Direct marketing' below.

EGAP uses a number of online channels, including social networking services, to communicate with individuals and organisations with an interest in our goods and services. The use of these services is governed by the online providers Terms and Conditions and Privacy Policies. All users may be required to supply personal information such as name and email address to use these channels to communicate with EGAP . Using these services to communicate with EGAP may make some personal information visible to EGAP and third parties.

Direct marketing

EGAP will only use personal information in contact lists for direct marketing purposes were;

- we collected the information from the individual
- the individual would reasonably expect that their personal information would be used or disclosed for direct marketing

- we have provided a simple means by which the individual can request not to receive direct marketing, and
- the individual has not made such a request.

Where an individual would not reasonably expect their personal information to be used for direct marketing, or when the information has been collected from a third party, EGAP will only use or disclose personal information for the purpose of direct marketing if;

- the individual has consented to the use or disclosure for this purpose, or it is impracticable to seek this consent
- we have provided a simple means by which the individual can opt out of direct marketing and the individual has not opted out, and
- in each direct marketing communication we have included a prominent statement telling the individual that they may request to no longer receive direct marketing, and no request is made.

Individuals have the right to contact EGAP to;

- request not to receive direct marketing communications from us
- request us not to disclose their personal information to other organisations for the purposes of direct marketing, or
- request us to provide the source of the individual's personal information.

EGAP will comply with these requests within a reasonable period and free of charge, but will not comply with requests to disclose the source of the information if it is impracticable or unreasonable to do so.

EGAP also undertakes to abide by other direct marketing legislation, including the *Do Not Call Register Act 2006* and the *Spam Act 2003* where applicable.

Data quality

EGAP maintain and update personal information in our contact lists when we are advised by individuals that their personal information has changed. We do regular audits on contact lists to check the currency of the contact information. We will remove contact information of any individual who advises us that they no longer wish to be included on that list and/or lists.

If you are on one of our email lists, you may remove yourself from further contact by clicking the 'unsubscribe' link at the bottom of the email.

Data security

The personal information in the contact lists is stored in password protected electronic media. When no longer required, personal information in contacts lists is deleted from our electronic contact lists.

Routine access to contacts lists is limited to the database operators who have responsibility for maintaining the contacts lists. Other staff members have access to the personal information in contacts lists on a need to know basis.

Access and correction

For information about how to access or correct personal information collected for our contact lists see 'Access and correction' above (section 4).

6.2. Administration Files

Purpose

The purpose of administration files is to have applicant and personnel records and to maintain current and past employee information for business and employment related purposes, or where authorised or required by law.

The purpose of keeping records on candidates for employment ("applicant records") is to allow EGAP to assess the suitability of candidates for employment.

The Information in these files may include;

- Application(s) for employment; including the employee's résumé, statements addressing the criteria and referee reports
- Any tasks undertaken by the employee during the selection process
- Notes from the interviewer/s during the selection process
- Contact details for the applicant and their referees.

The personal information in these files relates to the employee and may include;

- Application(s) for employment; including the employee's résumé, statements addressing the criteria and referee reports
- Any tasks undertaken by the employee during the selection process
- Notes from the interviewer/s during the selection process
- The employee's employment contract and other records relating to their terms and conditions of employment
- Proof of Australian citizenship or passport details to verify proof of ability to work in Australia
- Copies of academic qualifications and/or confirmation of these qualifications from the issuing body.
- Records of banking, tax and superannuation accounts and identification numbers
- Records relating to the employee's salary, benefits and leave
- Medical certificates or health related information supplied by an employee or their medical practitioner, including pre-employment medicals
- Contact details for employee and next of kin
- Superannuation contributions
- Information relating to the employee's training and development.
- Checklists to ensure all applicable information has been received and complied as required.

Collection

EGAP generally collect personal information directly from employees and applicants but may also collect personal information from other sources such as recruitment agents and personnel providers.

EGAP may also collect personal information about employees and applicants from third parties when it is relevant to the selection process.

Use and disclosure

Personal information contained in personnel files is only used for the purpose of maintaining current and past employee data and information for business and employment related purposes.

EGAP only uses personal information in applicant files for the purpose of assessing and processing applications for employment.

EGAP do not give personal information held in these files to other agencies, organisations or anyone else without the consent of the individual, unless the individual would reasonably expect or has been told, that information of that kind is usually passed to those agencies, organisations or individuals, or the disclosure is otherwise required or authorised by law.

Data quality

EGAP maintain and update personal information in our personnel and applicant files as necessary, or when we are advised by individuals that their personal information has changed.

Data security

EGAP will take all reasonable steps to ensure that all personnel or application files in its possession are protected against loss, unauthorised access, misuse, disclosure or modification and that only authorised employees have access to such material.

Personnel and payroll files are stored electronically with password protection and in locked cabinets in paper form (in the HR office which is locked out of normal business hours). Past employee files are archived and stored in locked cabinets.

Applicant files are stored electronically with password protection and in locked cabinets in paper form. EGAP will destroy all applicant paper data once the position has been finalised, unless the applicant is expressly advised that EGAP will retain the applicant data for future opportunities. The applicant is able to access, provide changes and request deletion of their applicant records, see 'Access and correction' above (section 4).

The following staff members have access to personnel and applicant files on a need to know basis;

- Directors
- Managers and/or supervisors
- Staff involved in the recruitment and selection process
- Regulatory Affairs Manager
- Human Resources staff.

Access and correction

For information about how to access or correct personal information collected for application files see 'Access and correction' above (section 4).

Current and past employees' personnel files are exempt from the Privacy Act and therefore are not accessible to the individual, however, should correction of the information contained in the personnel files be required the new information needs to be supplied to the Human Resources Department in the required format.

6.3. Credit and Financial Files

Purpose

EGAP maintains credit applications which may include contact information about individuals who may have applied for credit for their business to trade with EGAP businesses.

Collection

It is our usual practice to collect any personal information required in credit applications directly from individuals, for example, where they have asked for credit and supplied a completed credit application form.

Sometimes we may collect personal information from a third party or from a publicly available source, such as Veda or similar credit reporting bodies. We would usually only collect personal information in this way if the individual would reasonably expect us to, or has given their consent. For example, we might collect this information if we were trading with a sole trader who has requested credit with EGAP.

Use and disclosure

EGAP only use personal information in credit applications for the purpose of providing credit for the supply of goods to our customers and potential customers.

EGAP do not give personal information about an individual to other agencies, organisations or anyone else without consent. The only time this may occur without consent would be if the individual would reasonably expect, or has been advised, that information of that kind is usually passed to other agencies, organisations or individuals, or the disclosure is required or authorised by law.

Data quality

EGAP maintain and update personal information in credit applications when we are advised by individuals that their personal information has changed. We do regular audits on credit applications to check the currency of the contact information. We will remove contact information of any individual who advises us that they no longer wish to be included on that list and/or lists, see 'Data quality' above (section 4).

Data security

The personal information in the credit application is stored in either password protected electronic media or in locked cabinets in paper form.

Credit applications are filed and stored on password protected electronic media which are contained in our accounting software. These credit applications, either electronic or paper records, are stored for 7 years and then destroyed in a secure manner.

Routine access to credit applications is limited to the database operators who have responsibility for maintaining the credit applications. Other staff members have access to the credit applications on a need to know basis.

Access and correction

For information about how to access or correct personal information collected on our credit applications see 'Access and correction' above (section 4).

APPROVED:

Lauren Buttigieg
REGULATORY AFFAIRS MANAGER

Peter Wingfield
CEO

***EGAP Companies in Australia:**

Elta Group (Asia Pacific) Pty Ltd - see below individual websites

Fantech Pty Ltd – www.fantech.com.au

Air Design Pty Ltd – www.airdesign.com.au

Systemaire Pty Ltd – www.systemaire.com.au

Burra Sheetmetal Pty Ltd – www.burrasm.com.au

Airepure Australia Pty Ltd – www.airepure.com.au