

# SHRED ON SITE PRIVACY POLICY

## INTRODUCTION

Shred on Site ABN 50 168 834 419 [referred to also as **Shred on Site, we, our, us**] is bound by the Australian Privacy Principles enshrined in the Privacy Act 1988 (Cth) (as amended) [APPs] and is committed to protecting the privacy of individuals who deal with us.

This privacy policy tells you how we manage your Personal Information that we collect and hold for you. In this policy we seek to allay any concerns you may have about how we handle your Personal Information by clearly setting out:

- Types of Personal Information we collect from you
- How we collect and hold it
- How we use and disclose it
- How we keep it secure
- How you may access and correct it
- How we will deal with a privacy complaint you make
- How you can contact us

This Privacy Policy applies to Shred On Site but not to other organisations or websites to which we are linked. It covers Personal Information collected, held, used and disclosed by Shred On Site in relation to:

- prospective or actual clients
- visitors to our website
- prospective or actual suppliers/independent contractors
- recruitment [but not existing employees]

## TYPES OF PERSONAL INFORMATION WE COLLECT FROM YOU

First let us explain for you the meaning of Personal Information as it is used in this privacy policy.

**Personal Information** as it is used in this privacy policy and as defined in s 6(1) of the Privacy Act 1988 (Cth) 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 an opinion.*

Another important category of Personal Information in the Privacy Act is sensitive information. **Sensitive Information** is a subset of Personal Information, where more strict rules are imposed [usually requiring consent of the individual to use their sensitive Personal Information]. The Privacy Act defines *Sensitive Information* as:

- (a) *information or an opinion about an individual's racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; sexual preferences or practices; or criminal record - that is also Personal Information; or*
- (b) *health information about an individual; or*
- (c) *genetic information about an individual that is not otherwise health information; or*
- (d) *biometric information that is to be used for the purpose of automated biometric verification or biometric identification, and biometric templates.*

The types of Personal Information we may collect from you will depend on the services you

wish us to provide to you, or alternatively the services you offer or provide to us. Personal Information that is generally collected will be your name and contact details, which may include your mobile phone number, email and postal address. Where required for a stated purpose we may ask for your occupation.

The primary purpose of collecting your personal information is for Shred On Site's business and marketing operations, which includes providing the user with advice on Shred On Site's goods and services, communication interface, and business innovations.

## **HOW WE COLLECT AND HOLD YOUR PERSONAL INFORMATION**

We will generally collect Personal Information from you in person, over the phone, from an enquiry you make from our website or a third party website or from an email you send to us.

We don't collect your Personal Information unless we need it for any of our stated purposes or otherwise where we first obtain your consent.

In some circumstances, you may choose not to give us your Personal Information or to deal with us anonymously or using a pseudonym. However, this may mean that we are unable to carry out the services requested by you.

## **HOW WE USE AND DISCLOSE YOUR PERSONAL INFORMATION**

### **Prospective and actual clients**

We use your Personal Information for the primary purpose for which it was collected and that is to communicate with you regarding the use of our services.

### **Direct marketing**

Once we have your Personal Information in our database we may contact you from time to time by post, telephone, email, sms, online or via apps for ongoing marketing and sales related purposes, or to advise you of other related opportunities that we or a related company can offer to you. You will be given the option to opt-out of any such future approaches and to remove your personal details from our database. You can do this at any time by emailing our Privacy Officer and asking to be removed from the mailing list. Alternatively, you can fax or mail a request asking to be removed. Contact details are set out below. There is no fee for doing this.

### **Website privacy**

We operate our website found at <http://www.shredonsite.com.au/> (**our website**).

Our website may record information collected when you visit our website. The information recorded may include the date and time of your visit, the pages accessed, any information downloaded, and any information and details that you enter for the purpose of contacting us for any reason. We may use information collected via our website for statistical, reporting and website administration and maintenance purposes.

Our website may use 'cookies' to help personalise your online experience. You have the ability to accept or decline cookies. If you choose to decline cookies, you may not be able to fully experience the features of our website.

We use Google Analytics to collect a range of information about your interactions with our website. Google Analytics collects the information using a number of techniques including cookies and Java Script. We use this information to evaluate the effectiveness of our website. Information about how Google handles Personal Information is available at <http://www.google.com.au/intl/en/policies/privacy/>. You can opt out of the collection of information via Google Analytics by downloading the Google Analytics Opt-out Browser Add-on.

## **Social media**

We may participate in social media such as Twitter, Facebook and our website blog. If we think it is relevant to the quality of service that we provide, we may record the essence of any topic discussed by a particular individual and their name and may contact them.

Social media services also handle your Personal Information for their own purposes. These sites have their own privacy policies.

## **Personal information of potential new employees – recruitment process**

We will use your Personal Information that you provide to assess your application and to allow us to carry out any monitoring activities, which may be required of us under applicable law as an employer. Your application will constitute your express consent to our use of your Personal Information for this purpose.

## **HOW WE KEEP YOUR PERSONAL INFORMATION SECURE**

Keeping secure our client and other stakeholders' Personal Information is fundamental tenet of our business. We take and will continue to take active measures to ensure your Personal Information that we hold is kept secure and to actively consider whether we are able to retain or should securely dispose of Personal Information.

We will take reasonable steps to protect Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. We will securely destroy or de-identify the Personal Information we hold once the information is no longer needed for any purpose for which the information may be used or disclosed under the Australian Privacy Act. An exception is where information must be retained by law or a court/tribunal order. Destruction takes place on-site with all documents shredded before they leave our premises. (This service is provided on a regular basis through Shred On Site Pty Ltd.)

All completed client related files are archived electronically for a period of at least 7 years, after which time they will be deleted permanently from our system.

We will retain your contact details in our client relationship management database, until you ask us to remove them or we are required by law to do so.

We have taken appropriate security safeguards and measures to protect Personal Information, which has included taking steps and implementing strategies to manage: governance; ICT security; data breaches; physical security; personnel security and training, relevant workplace policies; careful handling of Personal Information throughout its life cycle, regular monitoring and review of security systems.

While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining this information.

## **HOW YOU MAY ACCESS OR CORRECT YOUR PERSONAL INFORMATION**

If you ask us, we will usually give you access to the Personal Information we hold about you. We will need to confirm your identity before giving you access to your Personal Information.

There are some circumstances under the APPs where we may not give you access to your Personal Information. For example, we can't give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety.

There is generally no cost for accessing or correcting your Personal Information, unless the request is complex or resource intensive. If there is a charge, it will be reasonable and we will let you know what it is going to be so that you can agree to it before we go ahead.

Requests for access or correction should be forwarded to our **Privacy Officer** using any of the methods set out below. We will ensure that all requests for access or correction are considered and determined within 30 days of receipt.

By phone: 1300 55 88 76

By email: [privacy@shredonsite.com.au](mailto:privacy@shredonsite.com.au)

By post: Confidential  
The Privacy Officer  
Shred on Site  
PO Box 168  
Elwood VIC 3184

## HOW WE WILL DEAL WITH ANY PRIVACY COMPLAINT YOU MAKE

### How do I make a privacy complaint?

You may complain about a breach of the Australian Privacy Principles [APPs] by submitting your complaint in writing to Shred On Site's **Privacy Officer** using our **Privacy Complaint Form**

Please consider the following before making a complaint:

- We can only consider complaints made about a person's Personal Information from the person themselves (or an authorised representative of that person).
- Any complaint should set out in as much detail as possible, all the relevant particulars relating to the complaint, including why the individual says that we have breached the APPs. Please complete the Privacy Complaint Form, which will assist with prompting you about all the relevant information required. A copy may be obtained on our website [www.shredonsite.com.au](http://www.shredonsite.com.au) or on request from our Office.
- Any information collected on the Privacy Complaint Form may be used or disclosed for the purposes of the investigation process but only if it is relevant to the complaint.

### How will my complaint be handled?

Our Privacy Officer will consider all complaints objectively in line with our Privacy Complaint Procedure and will:

- acknowledge receipt of your Complaint Form in writing within 7 days of receipt;
- Conduct an initial assessment of your complaint;
- Appoint an investigating officer [not connected to the complaint] to conduct an investigation into your complaint;
- Undertake an investigation;
- Make a determination as to whether a breach of the Privacy Act has occurred;
- Consider a remedy or action to be taken; and
- Communicate the decision to the person making the complaint within 30 days of receiving the complaint (where possible). If the matter is more complex and it is reasonable that we require further time to complete the investigation we will notify you of the estimated completion time in writing.

Sometimes it will not be possible to resolve a complaint to everyone's satisfaction. If we are unable to resolve the matter to your satisfaction, you may wish to escalate the matter to the Privacy Commissioner by calling the OAIC Enquiries Line on 1300 363 992; using the OAIC online Privacy Complaint form; by mail; by fax, or by email. Details to do this can be found at <http://www.oaic.gov.au/about-us/contact-us-page>

## **CHANGES TO OUR PRIVACY POLICY**

From time to time we may decide to amend or update our Privacy Policy. Changes will be posted on our website. We encourage you to periodically review our Privacy Policy so that you remain informed as to how we are protecting your Personal Information.

## **OUR CONTACT DETAILS - Privacy Officer**

Shred On Site Pty Ltd

By phone: 1300 55 88 76

By email: [privacy@shredonsite.com.au](mailto:privacy@shredonsite.com.au)

By post: Confidential  
The Privacy Officer  
Shred on Site  
PO Box 168  
Elwood 3184