

**LITHO SUPERPAK PTY LTD**  
**PRIVACY POLICY**

**PART A – AUSTRALIAN PRIVACY PRINCIPLES (APP) POLICY**

Litho Superpak Pty Ltd (**Litho, we or us**) manufactures and supplies cardboard and paper packaging products and related services to wholesale and industry customers. To provide our customers with such products and services, we need to collect and hold some of their personal information.

We are committed to protecting the privacy of our customers' personal information, and set out in this Privacy Policy how we collect and manage such information. To obtain more information about the Privacy Act 1988 (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) that govern the collection, use and management of your personal information by us, please visit the website of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

**What personal information do we collect?**

Depending on the products you require and your particular circumstances, we may collect a range of personal information about you such as your name, address, email address, telephone number or other contact details, financial status, credit history, transaction history, banking details and trade/business references. This is not an exhaustive list.

We may also collect from you, personal information about other individuals such as your guarantors or authorised representatives. In that case, we rely on you to inform those other individuals that you are providing their personal information to us and to advise them about our privacy policy.

**How we collect your personal information**

The main way we collect your personal information is through our credit and product application process.

However, we may also collect your personal information in the following ways:

- from documents such as application forms, agreements, letters and emails;
- during our conversation with you in person or via telephone or other means of communication;
- from third parties such as our related entities, business partners, credit reporting bodies (see our Credit Information Policy in Part B of this Privacy Policy for more information), other clients and your representatives;
- from publicly available sources of information; and
- from our records of how you use our products or services.

While you can choose to deal with us anonymously or using a pseudonym, you will be asked to provide certain personal information during our credit application process. Generally, you have no obligation to provide any information requested by us. However, if you choose to withhold the requested information, we may not be able to provide you with the products and services that depend on the collection of that information.

**How we hold and store your personal information**

Your personal information may be stored electronically or in paper files, in storage facilities that we own, operate or control ourselves, or that are owned or operated by our contractors or service providers. We take reasonable steps to maintain the security of your personal information and to protect it from misuse, interference and loss, as well as from unauthorised access, modification or disclosure. The security measures we take include:

- storing your personal information in a secured environment;
- strictly allowing access to the secured physical storage facility by authorised personnel only;
- strictly allowing access to the secured electronic system on which your information is stored by authorised personnel only; and
- monitoring and tracking details of any access and/or change to your information, including the date and time at which your information is accessed and/or changed, and by whom.

**How we use your personal information**

We may use your personal information for a range of purposes, including the following:

- to verify your identity;
- to provide products to you, to provide you with information about those products, to assist you with enquiries, or to provide you with better customer service;
- to administer and manage the products and services we provide to you, to charge and bill you for them, to collect any amounts you may owe us, to pay any amounts you owe to third parties on your behalf, or to conduct or facilitate any financial or other transactions as part of or in connection with any products or services we provide to you;
- to gain an understanding of your information and communication needs, to perform research and analysis, and to improve or develop our products and services; and
- to pre-fill or pre-complete in advance any documentation (eg application forms, orders for products or services, and contracts or any extensions or renewals of contracts) which:
  - is necessary;
  - is requested by you; or
  - we reasonably contemplate may be convenient, desirable or required,
 In respect of any of our existing or future business dealings or transactions with you.

We may also use your personal information to promote and market products which may be of interest to you, and to forward you other information by way of regular bulletins or other means of communication such as email, text, SMS, MMS, telephone and post, unless and until you inform us that you do not wish to receive such information by calling our Customer Services Team on 03 9380 9867 or by sending us an email at [lithosuperpak@lithosuperpak.com.au](mailto:lithosuperpak@lithosuperpak.com.au)

We will not sell, assign or rent your personal information to any third party without your permission, unless required by law.

#### **When we disclose your personal information**

Where necessary for our business or the provision of products you require, we may disclose your personal information to third parties such as our service providers, delivery companies and banks. We require such third parties to adhere to strict confidentiality requirements and to adhere to all applicable privacy laws in relation to the personal information provided to them. We are unlikely to disclose personal information to overseas recipients.

We may also disclose your personal information:

- to any law enforcement or security agencies, or to any government or regulatory authorities, as required or authorised by law;
- to any third party in order for us to exercise our rights or perform our obligations in respect of any products being supplied to you;
- to your authorised representatives or advisers, or when you ask us to do so; and
- to third parties who assist us to manage or develop our business or products.

#### **Integrity of personal information**

We take all reasonable steps to ensure that personal information collected, used and disclosed by us is accurate, up to date and complete. We will promptly correct any inaccurate information when identified.

#### **Destruction and de-identification of personal information**

We will take reasonable steps to de-identify or destroy personal information when it is no longer needed by us or for legal requirements.

#### **Access to the personal information we hold about you, and complaint process**

If you wish to access, obtain details of, or correct any errors in any personal information we hold about you, please contact our Client Services Team by phone on 03 9380 9867 or by email at [lithosuperpak@lithosuperpak.com.au](mailto:lithosuperpak@lithosuperpak.com.au). We may impose an administrative charge for providing access to your personal information in response to a request.

You may also contact our Client Services Team by phone on 03 9380 9867 or by email at [lithosuperpak@lithosuperpak.com.au](mailto:lithosuperpak@lithosuperpak.com.au) if you have any privacy complaint against us (including if you believe that we have not complied with the Privacy Act or the APPs). Complaints in relation to personal information will be handled through our normal complaint handling processes which include the acknowledgement of your complaint in a prompt manner, and the provision of an estimated timeframe for our response to your complaint.

We will use our reasonable endeavours to resolve any complaints that you may have in good faith without the need to involve any third party. In the event that your complaint is not resolved in this manner, you may lodge a complaint with the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)).

### **PART B – CREDIT INFORMATION POLICY**

Litho may provide business or commercial credit to our customers in connection with our products. As a result, we may collect credit information and credit eligibility information about you as referred to in the Privacy Act. The Credit Information Policy contained in this Part B of our Privacy Policy sets out how we manage such information. This Credit Information Policy relates to Litho as far as it is deemed to be a credit provider for the purposes of the Privacy Act.

#### **How we collect and hold credit information and credit eligibility information about you**

“Credit information” relates primarily to your credit related dealings with a credit provider (including us), and covers various types of information that may be collected by credit reporting bodies (CRBs) that compile and provide credit reports to authorised credit providers for the purpose of assessing your credit worthiness.

Credit information includes, but is not limited to:

- identification information about you;
- basic information about your credit account;
- details about information requests we make about you to CRBs;
- information about certain overdue payments and about serious credit infringements, and information about payments or subsequent arrangements in relation to either of these; and
- various publicly available information such as bankruptcy and credit related court judgements.

We may collect credit information about you in any of the circumstances relating to other personal information described in Part A of our Privacy Policy under the heading “How we collect your personal information”.

“Credit eligibility information” is information we generally collect from CRBs that is equivalent to the kinds of information listed above. This information relates primarily to your credit related dealings with other credit providers (eg banks, other financial institutions, or other organisations that may provide you with credit in connection with their products or services). It may also include certain credit worthiness information that we derive from the data that we receive from a CRB. Sometimes we may also collect credit eligibility information about you from other credit providers which is permitted under privacy laws.

Since we only provide business or commercial credit (rather than consumer credit) as part of our business, we do not hold an Australian Credit Licence (ACL) under the National Consumer Credit Protection Act 2009 (Cth). As such, we will only collect credit information and credit eligibility information about you from third parties if such collection is permitted under the Privacy Act.

We store and safeguard your credit information and credit eligibility information in the ways described in Part A of our Privacy Policy under the heading "How we hold and store your personal information".

#### **How we use and when we disclose your credit information and credit eligibility information**

As a provider of business or commercial credit only and a non-holder of an ACL, we will not disclose any of your credit information to CRBs unless otherwise permitted by law.

We may, however, use and disclose your credit information for other purposes and in other circumstances as described in Part A of our Privacy Policy under the headings "How we use your personal information" and "When we disclose your personal information", when permitted to do so by the Privacy Act.

Our use and disclosure of credit information and credit eligibility information is regulated by Part IIIA of the Privacy Act and the Credit Reporting Privacy Code. We will only use or disclose such information for purposes permitted by these laws, such as:

- processing credit-related applications and managing credit that we provide;
- assisting you to avoid defaults;
- collecting amounts you may owe us in relation to such credit and dealing with serious credit infringements;
- assigning our debts;
- dealing with complaints or regulatory matters relating to credit or credit reporting; and
- as required or authorised by another law.

We are unlikely to disclose your credit information or credit eligibility information to entities outside of Australia.

#### **How to access or correct your credit information or credit eligibility information**

If you wish to access or correct errors in any of your credit information or credit eligibility information that we hold, please contact us using the contact details in Part C of our Privacy Policy under the heading "Contact Us".

We may apply an administrative charge for providing access to your credit eligibility information, depending on the request.

#### **How to make a complaint regarding our compliance with Part IIIA of the Privacy Act and the Credit Reporting Privacy Code**

If you think that we have not complied with Part IIIA of the Privacy Act or with the Credit Reporting Privacy Code (which regulates credit reporting), you can make a complaint by using the contact details in Part C of our Privacy Policy under the heading "Contact Us".

We will acknowledge your complaint in writing as soon as practicable within 7 days. We will aim to investigate and resolve your complaint within 30 days of receiving it. If we need more time, we will notify you about the reasons for the delay and ask for your agreement to extend this 30 day period (if you do not agree, we may not be able to resolve your complaint).

While we hope that we will be able to resolve any complaint without the need to involve third parties, if you are not satisfied with the outcome of your complaint you can make a complaint to the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)).

## **PART C – GENERAL**

### **About this Privacy Policy**

This Privacy Policy has been issued by Litho Superpak Pty Ltd, effective as at 1 January 2015. A copy of this Privacy Policy is attached to our Credit Application Form and is available on request.

### **Contact Us**

Should you have any questions about Litho or this Privacy Policy, you can contact us by phone on 03 9380 9867 or by email at [lithosuperpak@lithosuperpak.com.au](mailto:lithosuperpak@lithosuperpak.com.au)