

APP PRIVACY POLICY

Help Enterprises Limited

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INTRODUCTION

1. This APP Privacy Policy is Help Enterprises Limited ACN 009 776 032, ABN 46 479 304 129 (“Help Enterprises”) official privacy policy as required by the *Privacy Act 1988* (the “Act”) and the Australian Privacy Principles (the “APPs”) and it applies to all personal information (including sensitive information) about individuals collected by Help Enterprises and Help Enterprises’ various business divisions including:
 - a) **Help Commercial Operations** and its businesses:
 - i. **Help Manufacturing**, comprising of
 - i. **MailSafe** Mailboxes;
 - ii. **GarageSafe** Storage Solutions;
 - iii. **BinSafe** Bin Enclosures;
 - iv. **ShadeSafe** Awnings, Shutters, Screens
 - ii. **Help Supply Chain Services**
 - iii. **Fison Food Factory**
 - iv. **Oxford Park Nursery**
 - b) **Help Employment & Training**
 - c) **Help Disability Care** and it’s valued services:
 - i. **McIntyre Centre Riding for Disabled**
 - ii. **Allamanda Disability Housing**

In this policy we explain how and why we collect personal information about individuals (including sensitive information), how we use it, and what controls individuals have over our use of such information about them.

In this policy, reference to Help Enterprises applies to all business divisions and initiatives that Help Enterprises controls and/or operates.

2. Help Enterprises is committed to complying with Commonwealth legislation (the Act and the APPs) that deals with how businesses may collect, hold and use personal information (including sensitive information) about individuals and to protecting and safeguarding individual’s privacy when they deal with us.

COLLECTION OF INFORMATION

3. Some information provided to us by clients, customers and other parties might be considered private, personal and/or sensitive. However, without such information we would not be able to carry on our business activities and provide our services. We will only collect such personal and/or sensitive information if it is necessary for one of our functions or activities.
4. Sensitive information is a subset of personal information and is defined as information or an opinion (which is also personal information) 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 membership of a trade union; sexual preferences or practices; criminal record; or health information.
5. As a non-profit organisation whose business activities involve assisting people who live with disabilities or disadvantaged persons, Help Enterprises collects sensitive information about individuals in connection with activities and services of Help Enterprises.
6. Prior to the collection of sensitive information about an individual, Help Enterprises will ensure that the individual is adequately informed as to the reason for the collection of the sensitive information and that the individual has the capacity to understand and communicate their consent and that the consent is voluntarily given by the individual.
7. If Help Enterprises determines, following a reasonable enquiry, that an individual does not have the capacity to understand the reasons for the collection of the sensitive information by Help Enterprises or the individual does not have the capacity to provide their consent to Help Enterprises, Help Enterprises will only collect sensitive information about the individual if the individual's Legal Guardian has provided their express written consent on behalf of the individual.
8. The kinds of personal and/or sensitive information that Help Enterprises may collect and hold in respect of individuals includes:
 - Names;
 - Contact details and identification information including photo identification;
 - Age;
 - Gender;
 - Ethnicity;
 - Nationality;
 - Academic history;
 - Employment history;
 - Health information including: details of any mental conditions or disabilities; prescribed medications; medical conditions; prescribed therapies; assistance required; medical procedures; etc.
 - Medicare information;
 - financial information, including information about transactions and trading history with Help Enterprises;
 - Information about credit history;
 - Criminal history.
9. In particular, personal and/or sensitive information is collected in the following situations by Help Enterprises:

- If an individual completes an Enrolment Form, Post School Services Program Initial Interview Form, Course Referral Form, Application for Registration – Job Seeker Identification Number, or any other application form required to be completed by an individual to enable and/or facilitate services to be provided by Help Enterprises;
 - Health information provided by the individual to enable and/or facilitate services to be provided by Help Enterprises;
 - If an individual contacts Help Enterprises, we may keep a record of that communication or correspondence;
 - When applying for and/or establishing and/or accessing an account with us or ordering products or services from us;
 - When conducting certain types of transactions such as cheque or credit card purchases or refunds;
 - When an individual submits their contact details to be included on our mailing lists;
 - When an individual places an order on our web-site to purchase goods we may require the individual to provide us with contact information including their name, address, telephone number or email address and financial information (such as credit card details).
10. At or before the time the personal and/or sensitive information about an individual is collected by Help Enterprises, we will take reasonable steps to ensure that the individual is made aware of who we are, the fact that the individual is able to gain access to the information held about the individual, the purpose of the collection, the type(s) of organisations to which we may usually disclose the information collected about the individual, any laws requiring the collection of the information and the main consequences if all or part of the information is not collected.
11. Help Enterprises will usually collect personal information about individuals directly from the individual. However, sometimes we may need to collect personal information about individuals from third parties for the purposes described below in this policy. The circumstances in which Help Enterprises may need to do this include, for example, where we need information from a third party to assist us to process an application (such as to verify information an individual has provided or to assess the individual's circumstances) or to assist us to locate or communicate with the individual. In such circumstances where the information Help Enterprises may need to collect is sensitive information, Help Enterprises will only collect such information with the express consent of the individual or their Legal Guardian.

USE OF INFORMATION COLLECTED AND DISCLOSURE OF PERSONAL AND/OR SENSITIVE INFORMATION TO OTHERS

12. Help Enterprises may use or disclose personal and/or sensitive information held about an individual as permitted by law and for the purposes for which it is collected (e.g. provision of our services, including administration of our services, notifications about changes to our services, record-keeping following termination of our services and technical maintenance) - that is, to carry on our business and provide services to our customers. Help Enterprises may also use such information about individuals for a purpose related to the primary purpose of collection (in the case of sensitive information, the related purpose must be directly related to the primary purpose) and where the individual would reasonably expect that we would use the information in such a way. This information is only disclosed to parties outside our business in the circumstances set out in this policy or as otherwise notified at the time of collection of the information, or as maybe required or permitted by law.

13. Help Enterprises' purposes for which personal and/or sensitive information is collected, used and disclosed may include:
 - Processing an application or enrolment form or service request (including verifying a person's identity, health information, employment history, carer's assistance required, employment history, Government assistance eligibility);
 - Processing an application or product order or service request;
 - Managing and providing our products and services or other relationships and arrangements, including processing receipts, payments and invoices;
 - Assessing and monitoring credit worthiness;
 - detecting and preventing fraud and other risks to us and our customers;
 - Responding to inquiries about applications, accounts or other products, services or arrangements;
 - understanding our clients' and customers' needs and developing and offering products and services to meet those needs;
 - Researching and developing our products and services and maintaining and developing our systems and infrastructure (including undertaking testing);
 - Dealing with complaints;
 - Meeting legal and regulatory requirements. Various Australian laws may expressly require us to collect/and or disclose personal information about individuals , or we may need to do so in order to be able to comply with other obligations under those laws;
 - Enforcing our rights, including undertaking debt collection activities and legal proceedings.

14. In addition we are permitted to use or disclose personal and/or sensitive information held about individuals:

- Where the individual has consented to the use or disclosure of sensitive information and that use or disclosure is directly related to the primary purpose for which the sensitive information was collected;
- Where the individual has consented to the use or disclosure;
- Where we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious, immediate threat to someone's health or safety or the public's health or safety;
- Where we reasonably suspect that unlawful activity has been, is being or may be engaged in and the use or disclosure is a necessary part of our investigation or in reporting the matter to the relevant authorities;
- Where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process);
- Where we reasonably believe that the use or disclosure is necessary for prevention, investigation, prosecution and punishment of crimes or wrongdoings or the preparation for, conduct of, proceedings before any court or tribunal or the implementation of the orders of a court or tribunal by or on behalf of an enforcement body;
- Where a customer (being the individual or related to the individual) has requested a service to be provided by us and we are required to disclose the information to a third party in order to facilitate the provision of the service. In most, if not all cases, any such disclosure will be with the consent of the individual.

15. Third parties to whom we may disclose personal and/or sensitive information about individuals in accordance with Help Enterprises' business purposes and activities set out above and in accordance with Help Enterprises' obligations under the Act may include:

- Help Enterprises' legal advisors;
- Department of Communities, Child Safety and Disability Services (Qld);
- Australian Apprentices Centre;
- Centrelink;
- Medicare;
- The Department of Education, Training and Employment;
- Vocational Disability Support Services;
- Various other State and Federal Government Departments, bodies and agencies relevant to the services Help Enterprises provides to and on behalf of its clients;
- Medical service providers and/or other care or assistance providers;
- Any applicable parent(s) or legal guardian, to assist us to provide our services to you or on your behalf, including to inform of progress or to discuss any concerns;
- Australian Apprenticeship Centres;
- Employment Services Sites;
- Help Enterprises' IT service providers;
- Regulatory bodies in Australia;
- Help Enterprises' financial advisors;
- Participants in financial and payment systems, such as other banks, credit reporting bodies, credit providers, and credit card associations;
- Guarantors and security providers associated with individuals;
- Help Enterprises' debt collectors;

- Credit reporting bodies and other information providers.

ANONYMITY AND PSEUDONYMITY

16. Individuals have the option of dealing with Help Enterprises anonymously. However, this only applies where it is not impracticable for Help Enterprises to deal with individuals acting anonymously or under a pseudonym. For example, individuals making general enquiries of Help Enterprises may do so anonymously or under a pseudonym. However, if the dealing with Help Enterprises is for Help Enterprises to supply products and/or services and/or to enter into contractual relations then it is impractical for individuals to deal with Help Enterprises on an anonymous basis or under a pseudonym.

DIRECT MARKETING

17. As part of Help Enterprises' functions and business activities and to promote the services we can provide to our clients and customers, Help Enterprises may use personal information that individuals have provided to Help Enterprises for the purposes of direct marketing. Direct marketing includes, but is not limited to, sending to our clients and customers and other parties (including individuals) and/or contacting our clients and customers (including individuals) in relation to promotions and information about Help Enterprises. Recipients of direct marketing are always able to opt out of receiving direct marketing communications by sending an email to Help Enterprises' Privacy Officer at Privacy.Officer@helpenterprises.com.au in any direct marketing communication we remind recipients of their right to opt out of receiving direct marketing communications.
18. Help Enterprises will only use or disclose sensitive information for the purpose of direct marketing, if the individual has provided express consent to the use or disclosure for that purpose.

LINKS

19. The Help Enterprises web site may contain links to other web sites and those third party web sites may collect personal information about individuals. We are not responsible for the privacy practices of other businesses or the content of web sites that are linked to our web site. Help Enterprises encourages users to be aware when they leave the site and to read the privacy statements of each and every web site irrespective of whether those websites collect personally identifiable information.

SECURITY AND STORAGE

20. Help Enterprises places a great importance on the security of all information associated with our customers and clients and others who deal with us. We have security measures in place to protect against the loss, misuse and alteration of personal and/or sensitive information under our control. Help Enterprises takes all reasonable steps to protect personal and/or sensitive information that is under Help Enterprises' control from misuse, interference, loss and/or unauthorised access, modification or disclosure. All personal and/or sensitive information held is kept securely and that which is held electronically is held on secure servers in controlled facilities.
21. Personal and/or sensitive information is de-identified or destroyed securely when no longer required by us and/or is no longer required to be kept by us.
22. Help Enterprises retains information provided to us including individuals' contact and financial and transactional information to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes. Such information is held securely, including on secure servers in controlled facilities.
23. Information stored within our computer systems or by our agents who provide electronic storage facilities can only be accessed by those entrusted with authority and computer network password sanctions.
24. No data transmission over the Internet can be guaranteed to be 100 per cent secure. As a result, while we strive to protect users' personal and/or sensitive information, Help Enterprises cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once Help Enterprises receives a transmission, we make every effort to ensure the security of such transmission on our systems.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

25. Help Enterprises is committed to and takes all reasonable steps in respect of maintaining accurate, timely, relevant, complete and appropriate information about our customers, clients and web-site users.
26. Any individual may request access to personal and/or sensitive information about them held by Help Enterprises. Such a request for access to personal and/or sensitive information is to be made to Help Enterprises' Privacy Officer:

Help Enterprises' Privacy Officer
520 Curtin Avenue East
Eagle Farm QLD 4009
Telephone: 07 3868 9807
Email: Privacy.Officer@helpenterprises.com.au
27. Please note Help Enterprises does require that, as part of any request by an individual for access to personal and/or sensitive information, the individual verify their identity so that Help Enterprises may be satisfied that the request for access is being made by the individual concerned.

28. Please note that Help Enterprises is not required to give an individual access to personal and/or sensitive information in circumstances where:

- Help Enterprises reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- Giving access would have an unreasonable impact on the privacy of other individuals; or
- The request for access is frivolous or vexatious; or
- The information relates to existing or anticipated legal proceedings between Help Enterprises and the individual, and would not be accessible by the process of discovery in those proceedings; or
- Giving access would reveal the intentions of Help Enterprises in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
- Giving access would be unlawful; or
- Denying access is required or authorised by or under an Australian law or a court/ tribunal order; or
- Both of the following apply:
 - i. Help Enterprises has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to Help Enterprises' functions or activities has been, is being or may be engaged in;
 - ii. Giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
- Giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- Giving access would reveal evaluative information generated within Help Enterprises in connection with a commercially sensitive decision-making process.

29. Inaccurate information will be corrected upon receiving advice to this effect. To ensure confidentiality, details of an individual's personal and/or sensitive information will only be passed on to the individual if we are satisfied that the information relates to the individual. From time to time, and having regard to the purpose of the collection and use of personal and/or sensitive information about individuals, we may contact individuals to seek confirmation that the personal and/or sensitive information provided to us by the individual is accurate, up-to-date and complete.

30. If we refuse to provide an individual with access to or correct the personal and/or sensitive information held by us about the individual, then we will provide reasons for such refusal. Such reasons will set out the grounds for refusal, the mechanisms available to complain about the refusal and any other matters that are required by the Act.

31. Help Enterprises will respond to any requests for access or correction within a reasonable time of receipt of the request, but by no later than 30 days of the request being received.

DATA BREACHES

32. A data breach will occur where an unknown or unauthorised person gains access to our network or client information, or information is lost in circumstances where unauthorised access or disclosure may occur.
33. If a data breach relating to personal information occurs or we suspect one might have occurred we will conduct a reasonable and expeditious investigation within 30 days and take action to reduce or prevent harm from the data breach.
34. In any instance where an eligible data breach occurs limitations to the access and dissemination of personal information will be enforced with notification to the affected individuals at risk of serious harm, the Office of the Australian information Commissioner (OAIC) and the Department of Jobs and Small Business, as is deemed appropriate. Please refer to the Notifiable Data Breaches (NBD) Scheme Part IIIC of the Privacy Act 1988, found [here](#) for additional information.
35. In the case of serious breach of personal information (where a reasonable person would conclude that it will likely result in 'serious harm' to the individual to whom the person information relates), we will prepare a statement regarding the data breach and notify the Office of the Australian Information Commissioner and the affected individual/s as soon as reasonably possible.
36. Serious harm includes physical, psychological, emotional, financial and reputational harm. In determining whether serious harm is likely to occur, we will consider:
 - If any action has been taken to prevent or reduce the harm;
 - The kind and sensitivity of the information involved in the breach;
 - Whether the information is protected by security measures and the likelihood those security measures could be overcome;
 - The person or kinds of person who have or could obtain the information; and
 - The nature of the harm.
37. We will notify the affected individuals via our usual means of communication. Where direct notification is not practicable, we will publicise the statement on our website (<https://www.helpenterprises.com.au/>) and take reasonable steps to publicise its contents.
38. The statement to individuals affected by a breach will include, where appropriate:
 - Our contact details;
 - A description of the incident;
 - Type of personal information involved;
 - Our response to the breach;
 - An offer of assistance (including the recommended steps the individual should take);
 - Privacy information sources; and
 - The contact details of any other entity that we have reasonable grounds to believe is also involved in the breach.

COMPLAINTS

39. If an individual has a complaint about our APP Privacy Policy or Help Enterprises' collection, use or safe disposal or destruction of personal information about the individual, any complaint should be directed in the first instance to Help Enterprises' Privacy Officer at the contact details set out at clause 26 of this policy.
40. We will investigate any complaint within 30 calendar days and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of personal and/or sensitive information held by us about the complainant in accordance with the Act and the APPs. If a complainant is not satisfied with the outcome of this procedure then the complainant may contact the Office of the Australian Information Commissioner ("OAIC"). The web site of the OAIC is www.oaic.gov.au.

TRANSFER OF INFORMATION OVERSEAS

41. Help Enterprises is unlikely to disclose personal information to overseas recipients. Personal and/or sensitive information will only be disclosed by Help Enterprises to overseas recipients in accordance with Australian Privacy Principle 8, such as if the individual consents to the disclosure or if the disclosure is required by Australian law.

COOKIES

42. Help Enterprises collects information from the site using "IP files".
43. When a user visits Help Enterprises' web site to read, browse or download information, our system will record/log the user's IP address (the address which identifies the user's computer on the internet and which is automatically recognised by our web server), date and time of the visit to our web site, the pages viewed and any information downloaded. This information will only be used for the purpose of site analysis and to help us offer improved online service. We may automatically collect non-personal information about users such as the type of Internet browsers used or the site from which the user linked to our web sites. Individuals cannot be identified from this information and it is only used to assist us in providing an effective service on our web sites.

CHANGES TO APP PRIVACY POLICY

44. If Help Enterprises decides to or is required to change its APP Privacy Policy, we will notify of such amendments on our web site and/or monthly statements/invoices rendered by Help Enterprises and post changes on this APP Privacy Policy page so that users are always aware of what information is collected by us, how it is used and the way in which information may be disclosed. As a result, please refer back to this APP Privacy Policy regularly to review any amendments.

CONTACTING US

45. For further information regarding our APP Privacy Policy, please contact us at the following address:

E-mail: Privacy.Officer@helpenterprises.com.au

For more information on privacy legislation or the APPs please visit the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.



CREDIT REPORTING PRIVACY POLICY

Help Enterprises Limited

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INTRODUCTION

1. This Credit Reporting Privacy Policy is the official credit reporting policy of Help Enterprises Limited ACN 009 776 032, ABN 46 479 304 129 ("**Help Enterprises**") as required by the *Privacy Act 1988* (the "Act") and particularly Part IIIA of that Act and the Credit Reporting Code (the "CR Code") and it applies to all credit information and credit eligibility information about individuals ("credit information") collected, held and used by Help Enterprises and Help Enterprises' various business divisions in its activities as a credit provider.

Help Enterprises' various business divisions that provide credit services include, but not limited to:

- a) **Help Commercial Operations** and its businesses:
 - i. **Help Manufacturing**, comprising of
 - i. **MailSafe** Mailboxes;
 - ii. **GarageSafe** Storage Solutions;
 - iii. **BinSafe** Bin Enclosures;
 - iv. **ShadeSafe** Awnings, Shutters, Screens
 - ii. **Help Supply Chain Services**
 - iii. **Fison Food Factory**
 - iv. **Oxford Park Nursery**
- b) **Help Employment & Training**
- c) **Help Disability Care** and its valued services:
 - i. **McIntyre Centre Riding for Disabled**
 - ii. **Allamanda Disability Housing**

In this policy, reference to "Help Enterprises" applies to all business divisions and initiatives that Help Enterprises controls and/or operates.

In this policy we explain how and why we collect credit information about individuals, how we use such information, and what controls individuals have over our collection and use of information about them. This policy is relevant to individuals who are current and former commercial credit account holder customers, as well as other individuals that Help Enterprises deals with in connection with credit we provide to our commercial credit account customers (for instance, such individuals may be guarantors or directors of corporate customers).

2. Help Enterprises is committed to complying with Commonwealth legislation and regulations (the Act and the CR Code) governing privacy of credit information about individuals by credit providers and to protecting and safeguarding the privacy of individuals when they deal with us.

COLLECTION OF INFORMATION AND TYPES OF INFORMATION COLLECTED

3. Help Enterprises collects, holds and uses various types of credit-related information about individuals, which information includes:
 - Identification information such as current and prior names and addresses, age, contact details and driver's licence number;
 - Applications for credit (including the name of each relevant credit provider), the type and amount of that credit and the fact Help Enterprises has accessed consumer credit information to assess a relevant application;
 - That Help Enterprises and other credit providers are or have been a provider of credit to an individual (or an entity associated with an individual) and the type, characteristics and maximum amount of credit that have been provided or will be provided;
 - The date that any credit contract Help Enterprises or other credit providers have or have had with an individual was entered into and the date that it comes to an end;
 - Payments owed to Help Enterprises or another credit provider, in connection with credit provided to an individual (or an entity associated with an individual) or in relation to which an individual is a guarantor (and, if there is subsequently paid any such overdue payment, the fact of that payment);
 - Whether in Help Enterprises' or another credit provider's opinion an individual has committed a serious credit infringement;
 - Whether an individual has entered into arrangements with Help Enterprises or other credit providers in connection with credit provided to the individual (or an entity associated with the individual);
 - Court proceedings information, personal insolvency information and credit-related publicly available information;
 - Scores, ratings, summaries, evaluations and other information relating to an individual's credit worthiness which is derived by Help Enterprises or its agents or by CRBs wholly or partly on the basis of the information above;
 - Certain administrative information relating to credit, such as account and customer numbers.
 - While the Act uses a variety of terms to refer to such information as referred to above, for ease of understanding and reading this policy, such information is referred to hereinafter as "**credit information**".

4. Credit information may be collected by Help Enterprises in a number of ways including:
 - Being provided by an individual directly to Help Enterprises or by persons acting on behalf of the individual (such as on applications or other forms);
 - Being provided by credit reporting bodies (“**CRBs**”) and other credit providers with the consent of the individual;
 - Being information that is in the public domain;
 - Being information is derived by Help Enterprises from an individual’s usage and (where applicable) trade on and transactional history on any account (of the individual or of an entity associated with the individual) held with Help Enterprises.

HOW CREDIT INFORMATION IS HELD

5. At or before the time any credit information is collected by Help Enterprises about an individual, we will take reasonable steps to ensure that the individual is made aware of who we are, the fact that the individual is able to gain access to the information held about the individual, the purpose of the collection, the type(s) of entities to which we usually disclose such information collected about the individuals, any laws requiring the collection of the information and the main consequences for the individual if all or part of the information is not collected.
6. Help Enterprises may hold credit information about an individual in physical form or in electronic form on our systems or on the systems of Help Enterprises’ IT service providers.

The credit information Help Enterprises holds about individuals is protected by physical, electronic, and procedural safeguards and Help Enterprises also requires its service providers that hold and process such information on Help Enterprises’ behalf to follow appropriate standards of security and confidentiality. Any credit information we collect from an individual or about an individual is kept securely and held on secure servers in controlled facilities.

7. Help Enterprises trains its staff and others who work for it on how to handle credit information appropriately and Help Enterprises restricts access to what is necessary for specific job functions.

USE OF INFORMATION COLLECTED AND DISCLOSURE OF PERSONAL INFORMATION TO OTHERS

8. Help Enterprises may, as permitted by law, collect, hold, use or disclose credit information held about an individual for the purposes for which such information is collected. These purposes include:
- To form decisions as to whether to provide an individual, or an entity associated with an individual, with credit or to accept an individual as a guarantor;
 - To make assessments relating to an individual's credit worthiness which are used in Help Enterprises' ongoing decision-making processes regarding provision of credit and the amount of such credit;
 - To participate in the credit reporting system including in obtaining from and providing information to CRBs and other credit providers as permitted by Part IIIA of the Act and the CR Code;
 - To assist an individual or entity associated with the individual to avoid defaulting on credit-related obligations to Help Enterprises or other credit providers;
 - To undertake debt recovery and enforcement activities, including in relation to guarantors, and to deal with serious credit infringements;
 - To deal with complaints and meet legal and regulatory requirements; and
 - To assist other credit providers to do the same.

(Some credit information may only be used or disclosed under the Act for some of the above purposes or in some particular circumstances. Certain such particular circumstances are set out in clause 9 below.)

9. Generally, Help Enterprises will be permitted to use or disclose credit information held about an individual where the individual has consented to the use or disclosure. Help Enterprises may disclose credit information about an individual to CRBs and/or to other credit providers for such purposes as set out at clause 8 above as permitted by the Act. For example, Help Enterprises may be permitted to disclose credit information to a CRB in such circumstances as where the individual has consented to the disclosure or where the individual has failed to meet payment obligations in relation to credit provided by Help Enterprises or if the individual has committed a serious credit infringement. Similarly, Help Enterprises will generally be permitted to disclose credit information to another credit provider about an individual where the individual has consented to such disclosure.

10. CRBs may include credit information provided by Help Enterprises in reports provided to other credit providers to assist such other credit providers to assess the individual's credit worthiness. Help Enterprises shares credit information with the following CRBs:

Equifax

Equifax Australia Information Services and Solutions Pty Ltd
Locked Bag 965, NORTH SYDNEY NSW 2059
Email: Equifax@au.e-notification.net

Dun & Bradstreet

PO Box 7405, St Kilda Rd, Melbourne VIC 3004
Email clientservices@dnb.com.au or call D&B Client Services 13 23 33

You are able to obtain a copy of Equifax's and Dun & Bradstreet's credit reporting policies from their website.

Help Enterprises may, in the future, disclose credit information to a CRB other than those named above but prior to disclosing any credit information about individuals to any other CRB Help Enterprises will amend its Credit Reporting Privacy Policy to set out the name and contact details of any such other CRB and will post a notification of the change to the Credit Reporting Privacy Policy on Help Enterprises' website.

RIGHTS IN RELATION TO CRBS

11. Individuals have certain rights in respect of CRBs and the information a CRB holds about the individual and those rights include:
- Opting out of direct marketing pre-screenings. A CRB may use an individual's credit information to assist a credit provider to market to that individual by pre-screening the individual for direct marketing by the credit provider. This process is known as a "pre-screening". If an individual does not want a CRB (including the CRBs listed above) to use that individual's information for the purpose of pre-screening, the individual has the right under the Act to contact the CRB to request that they exclude the individual from such processes.
 - If an individual is a victim of fraud (including identity-related fraud). An individual is entitled under the Act to request that a CRB not use or disclose credit reporting information they hold about the individual in circumstances where the individual reasonably believes that they have been or are likely to be a victim of fraud, including identity-related fraud. The period while this applies is called a "ban period". An individual can make such a request to any CRB, including those listed above.

DIRECT MARKETING

12. As part of Help Enterprises' functions and business activities and to promote the services we can provide to our clients and customers and other parties, including in respect of Help Enterprises' credit-related activities, Help Enterprises may be permitted to use personal information about individuals that individuals have provided to Help Enterprises for the purposes of direct marketing. Direct marketing includes, but is not limited to, sending to and/or contacting individuals in relation to promotions and information about Help Enterprises. All recipients, including individuals, can opt out of receiving direct marketing communications by sending an email to Help Enterprises' Privacy Officer at Privacy.Officer@helpenterprises.com.au. In any direct marketing communication we remind recipients of their right to opt out of receiving direct marketing communications. However, as a general rule, a credit provider such as Help Enterprises is not permitted to disclose to others credit information about individuals for the purposes of direct marketing. We also refer to the right of individuals, set out at paragraph 11 above, to opt out of direct market pre-screenings by CRBs.

ANONYMITY AND PSEUDONYMITY

13. Individuals would generally have the option of dealing with Help Enterprises anonymously. However, this only applies where it is not impracticable for Help Enterprises to deal with individuals acting anonymously or under a pseudonym. For example, individuals making general enquiries of Help Enterprises may do so anonymously or under a pseudonym. However, if the dealing with Help Enterprises is for Help Enterprises to supply products and services and/or to enter into contractual relations (such as a commercial credit account) with a customer that is the individual or is associated with the individual, then it is impractical for such individuals to deal with Help Enterprises on an anonymous basis or under a pseudonym.

LINKS

14. Our web site may contain links to other web sites and those third party web sites may collect personal information about individuals. We are not responsible for the privacy practices of other businesses or the content of web sites that are linked to our web site. Help Enterprises encourages users to be aware when they leave the site and to read the privacy statements of each and every web site irrespective of whether those websites collect personally identifiable information.

SECURITY AND STORAGE

15. Help Enterprises places a great importance on the security of all information associated with our customers, clients and contractors. We have security measures in place to protect against the loss, misuse and alteration of personal information (including credit information) under our control. Help Enterprises takes all reasonable steps to protect individuals' personal information that is under Help Enterprises' control from misuse, interference, loss and/or unauthorised access, modification or disclosure. All personal information (including credit information) held is kept securely and that held electronically is held on secure servers in controlled facilities.
16. Personal information (including credit information) is de-identified or destroyed securely when no longer required by us and/or is no longer required to be kept by us.
17. Help Enterprises retains information provided to us including individuals' contact and financial and transactional information to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes. Such information is held securely, including on secure servers in controlled facilities.
18. Information stored within our computer systems or by our agents who provide electronic storage facilities can only be accessed by those entrusted with authority and computer network password sanctions.
19. No data transmission over the Internet can be guaranteed to be 100 per cent secure. As a result, while we strive to protect users' personal information (including credit information), Help Enterprises cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once Help Enterprises receives a transmission, we make every effort to ensure the security of such transmission on our systems.
20. Ultimately, individuals are solely responsible for keeping their passwords and/or account information secret. Individuals should be careful and responsible whenever they are online.

DATA BREACHES

21. A data breach will occur where an unknown or unauthorised person gains access to our network or client information, or information is lost in circumstances where unauthorised access or disclosure may occur.
22. If a data breach relating to personal information occurs or we suspect one might have occurred we will conduct a reasonable and expeditious investigation within 30 days and take action to reduce or prevent harm from the data breach.
23. In any instance where an eligible data breach occurs limitations to the access and dissemination of personal information will be enforced with notification to the affected individuals at risk of serious harm, the Office of the Australian information Commissioner (OAIC) and the Department of Jobs and Small Business, as is deemed appropriate. Please refer to the Notifiable Data Breaches (NBD) Scheme Part IIC of the Privacy Act 1988, found [here](#) for additional information.
24. In the case of serious breach of personal information (where a reasonable person would conclude that it will likely result in 'serious harm' to the individual to whom the person information relates) we will prepare a statement regarding the data breach and notify the Office of the Australian Information Commissioner and the affected individual/s as soon as reasonably possible.
25. Serious harm includes physical, psychological, emotional, financial and reputational harm. In determining whether serious harm is likely to occur, we will consider:
 - If any action has been taken to prevent or reduce the harm;
 - The kind and sensitivity of the information involved in the breach;
 - Whether the information is protected by security measures and the likelihood those security measures could be overcome;
 - The person or kinds of person who have or could obtain the information; and
 - The nature of the harm.
26. We will notify the affected individuals via our usual means of communication. Where direct notification is not practicable, we will public the statement on our website (<https://www.helpenterprises.com.au/>) and take reasonable steps to publicise its contents.

27. The statement to individuals affected by a breach will include, where appropriate:
- Our contact details;
 - A description of the incident;
 - Type of personal information involved;
 - Our response to the breach;
 - An offer of assistance (including the recommended steps the individual should take);
 - Privacy information sources; and
 - The contact details of any other entity that we have reasonable grounds to believe is also involved in the breach.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

28. Help Enterprises is committed to and takes all reasonable steps in respect of maintaining accurate, timely, relevant, complete and appropriate information about our customers, clients and web-site users.
29. Any individual may request access to personal information (including credit information) about them held by Help Enterprises. Such a request for access to personal information is to be made to Help Enterprises' Privacy Officer:

Help Enterprises' Privacy Officer
520 Curtin Avenue East
Eagle Farm QLD 4009
Telephone: 07 3868 9807
Email: Privacy.Officer@helpenterprises.com.au

30. Please note Help Enterprises does require that, as part of any request by an individual for access to personal information (including credit information), the individual verify their identity so that Help Enterprises may be satisfied that the request for access is being made by the individual concerned.
31. Please note that Help Enterprises is not required to give an individual access to credit information about them in circumstances where:
- Giving access would be unlawful; or
 - Denying access is required or authorised by or under an Australian law or a court/tribunal order; or
 - Giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

32. Inaccurate information will be corrected upon receiving advice to this effect. To ensure confidentiality, details of an individual's personal information (including credit information) will only be passed on to the individual if we are satisfied that the information relates to the individual. From time to time, and having regard to the purpose of the collection and use of personal information (including credit information) about individuals, we may contact individuals to seek confirmation that the personal information provided to us by the individual is accurate, up-to-date and complete.
33. If we refuse to provide an individual with access to their personal information (including credit information) or to correct the personal information (including credit information) held by us about them, then we will provide reasons for such refusal. Such reasons will set out the grounds for refusal, the mechanisms available to complain about the refusal and any other matters that are required by the Act.
34. Help Enterprises will respond to any requests for access or correction within a reasonable time of receipt of the request, but by no later than 30 days of the request being received.

COMPLAINTS

35. If an individual has a complaint that Help Enterprises has not complied with its obligations under the Act then any such complaint should be directed in the first instance to Help Enterprises' Privacy Officer at the contact details set out at clause 22 of this policy.
36. Upon receiving a complaint we will, within 7 days, give the complainant written notice acknowledging receipt of the complaint and setting out the process of how we will deal with it. Unless a longer time is agreed by the complainant, we will investigate the complaint and make a decision within 30 days of receipt of the complaint and communicate the decision to the complainant. We aim to resolve all complaints within 30 days of receipt. If we cannot resolve a complaint within 30 days we will notify the complainant of the reasons and specify a date when we expect a decision or resolution will be made and seek the complainant's agreement to extend the 30 period – if the complainant does not agree then we may not be able to resolve the complaint.
37. It may be necessary (and it may be required by the Act), in order to deal with a complaint, to consult with a CRB or another credit provider. Further, if, while a complaint remains unresolved, we are disclosing information subject to the complaint to a third party, we may be required to advise the third party about the complaint.
38. If we find a complaint is justified we will resolve it and do what is required to rectify any breach. Help Enterprises is committed to fulfilling its obligations as an APP entity and a credit provider under the Privacy Act.

39. If a complainant is not satisfied with the outcome of Help Enterprises' internal complaints procedure in respect of Help Enterprises privacy practices then the complainant may refer their complaint to the Office of the Australian Information Commissioner ("OAIC"). The website for the OAIC is: www.oaic.gov.au.

TRANSFER OF INFORMATION OVERSEAS

40. Help Enterprises is unlikely to disclose personal information (including credit information about individuals) to overseas recipients. Personal information (including any credit information) would only be disclosed by Help Enterprises to overseas recipients in accordance with the requirements of the Act, such as if the individual consents to the disclosure or if the disclosure is required by law.

CHANGES TO PRIVACY POLICY

41. If Help Enterprises decides to or is required to change this Credit Reporting Privacy Policy, we will notify of such amendments on our web site and post changes on our privacy policy page so that users may be aware of any such changes and how they may affect them. As such, please remember to refer back to Help Enterprises' privacy policy page regularly to check whether there are any amendments.

CONTACTING US

42. For further information regarding our privacy policies, please contact us at the following address:

E-mail: Privacy.Officer@helpenterprises.com.au

43. For more information on privacy legislation and the CR Code please visit the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.