

# Privacy Policy

## 1. APPs

We are committed to providing quality services to you and this privacy policy outlines our ongoing obligations to you in respect of how we manage your personal information.

The Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (Privacy Act) govern the way in which we collect, use, disclose, store, secure and dispose of your personal information.

A copy of the APPs may be obtained from the website of The Office of the Australian Information Commissioner at [www.oaic.gov.au/](http://www.oaic.gov.au/)

## 2. Purpose of Policy

This Privacy Policy applies to our collection, use, disclosure and handling of personal and sensitive information, and to all such personal and sensitive information we may collect via our Website or in the course of providing our Services.

## 3. What is personal information?

“Personal information” means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g. your name) or indirectly.

You do not have to provide us with your personal information. Where possible, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you choose to deal with us in this way or choose not to provide us with your personal information, due to impracticality we may not be able to provide you with our services or otherwise interact with you.

## 4. What is sensitive information?

Under certain circumstances, we may need to collect “sensitive information” about you. This might include any information or opinion about your racial or ethnic origin, religious or philosophical beliefs, criminal record, or health information.

## 5. Collection of sensitive information

If we collect your sensitive information, we will do so only with your consent, if it is reasonably necessary and directly related to the prevention of a serious and imminent threat to life or health, or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information.

## 6. Collection of personal information

We may collect personal information from you to the extent that it is reasonably necessary for us to perform one or more of our functions or activities and provide you with the Services. We can do this in a number of different ways, including directly from you or in the course of our dealings with you, when you provide personal information to us via the Website, or when you contact and correspond with us including when you:

- interact with us over the phone;
- interact with us online;
- via email or website query; or
- apply for a position with us as an employee, contractor or volunteer.

The personal information we collect about you may include (but may not be limited to):

- your name;
- phone number
- email address;
- business address;
- mailing address; and/or
- payment card information.

When we collect personal information from you we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

## 7. Collecting personal information from third parties

We may also collect your personal information from third parties or through publicly available sources, for example from Creditor Watch or ASIC. We collect your personal information from these third parties, only in the event we receive a High Risk Alert from Creditor Watch.

## 8. Use and Disclosure

We may use or disclose your personal information for the purpose for which it was collected and in accordance with Australian law, such as:

- to provide you with the Services;
- to verify your identity;
- to contact you;
- to promote our Services to our clients and individuals who may be interested in our Services either for the business with which they are associated or personally and to provide them with information about developments, events or other products or services that may interest them, by way of direct marketing and otherwise; and
- to facilitate our internal business operations, including to fulfil our legal requirements, to provide customer support, to support and manage our employees, to protect our property, to prevent and investigate crime or possible crime, and to provide information to external service providers so that they can provide financial, administrative or other services in connection with the operations of our business.

We may also use and disclose your personal information for a secondary purpose that is related to a purpose for which we collected it, where you would reasonably expect us to use or disclose your personal information for that secondary purpose.

We may also disclose your personal information to third parties, including:

- where you have expressly or impliedly consented to the use or disclosure of sensitive or personal information;
- where the use or disclosure is authorised or required by or under an Australian law or court/tribunal order; and
- with third party service providers we use in conducting our business (including, without limitation, insurance brokers, banks, document production, legal outsourcing providers, visa/migration consultants, billing or data storage services, email filtering, virus scanning and other technology services providers, marketing partners, advertising partners, research firms, marketing Website providers (including social media services) and archival services providers).

Some of the third parties to whom we disclose your personal information may be located outside Australia. For example, we may disclose your personal information to external national or overseas facilities in the course of conducting information and data processing, back up and scanning or for the purposes of obtaining other services from third parties.

## 9. Transfer of personal information overseas

Some of the third-party service providers we disclose personal information to may be based in or have servers located outside of Australia.

Where we disclose your personal information to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained. We will only disclose to overseas third parties if:

- you have given us your consent to disclose personal information to that third party; or
- we reasonably believe that:
- the overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the APPs; and
- the law or binding scheme can be enforced; or

- the disclosure is required or authorised by an Australian law or court/tribunal order.

## 10. Third Party links

Through your use of the Website you may receive or access links to third party websites and/or the opportunity to share on social media (such as the “Share” or “Like” features on Facebook). Your access to such third party websites or use of social media features is subject to the privacy policies and practices of those third party web sites and/or social media providers. We do not control the collection, use or disclosure of any information on such third party links. You may access the Website through links on third party web sites. By entering the Website through a third party web site you may be allowing such third party’s website to view any information you provide to us. We are not responsible for the privacy practices or the content of any third party websites. We encourage you to review the privacy policies of any third party websites through which you access the Website.

## 11. Direct Marketing

You consent to the use of your personal or sensitive information provided to us for the purposes of direct marketing.

You may opt out of receiving direct marketing from us when you complete an order, or you may unsubscribe at any time by using the link included on all marketing emails. If you choose to opt out of receiving direct marketing, you will only receive emails in connection with the Services you have requested. To opt out of receiving targeted content and advertisements on our Website you can change your browser options to stop accepting cookies or to prompt you before accepting a cookie from any web site. You will be able to access and use the Website with cookies disabled, but the user experience may not be customised to your interests and needs.

## 12. Access and Changes

You have a right to request access to or correction of your information held by us. If you wish to access, correct or update any information we may hold about you, please contact us as set out below. However, we may charge an administrative fee for providing access to this information and we may refuse access for a valid reason. In order to protect your personal information we may require identification from you before releasing the requested information.

If we refuse you to access or correct your information for a valid reason, we will advise of the reason(s) at the time of your request.

## 13. Maintaining the quality of your information

It is an important to us that your information is up to date. We will take reasonable steps to make sure that your information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality Services to you.

## 14. Complaints process

We take privacy questions and complaints seriously. If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy, please contact our Administration and Office Manager via email: [admin@abbaeng.com](mailto:admin@abbaeng.com). We will investigate the complaint and determine whether a breach has occurred and what action, if any, to take. When contacting us, please provide as much detail as possible in relation to the query, issue or complaint. We will aim to respond to or resolve any such question or complaint in a timely and efficient manner, and our target response time is 30 days. We request that you cooperate with us during this process and provide us with relevant information we may require.

## 15. Storage and security of your personal information

We may store your files in hard copy or electronically in our ordinary IT systems. These may include Australian-based cloud servers or the servers of third parties within Australia. We will take reasonable steps to ensure that your personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure including by:

- having a robust physical security of our premises and databases/records;
- taking measures to restrict access to only personnel who need that personal information to effectively provide the Services; and
- having technological measures in place (for example, anti-virus software, fire walls).

However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to your personal information. Please notify us immediately if you become aware of any breach of security.

## 16. Changes to this Privacy Policy

We may change this Privacy Policy at our discretion. By continuing to use the Website or Services, you accept this Privacy Policy as it applies from time to time.

## 17. Defined terms

In this policy, the terms below have the following meanings:

“**Services**” means the services supplied by us in connection with the Website and our business generally.

“**We, us and our**” means Oceancross Pty Ltd T/As ABBA Engineering (ACN 093 337 270) and includes our subsidiaries, agents, employees, officers, representatives, affiliated or related entities, assigns and successors.

“**Website**” means our website: <https://abbaeng.com>

“**You**” means you, the person accessing or using the Website and/or the Services.