

PRIVACY POLICY

This Privacy Policy (**Policy**) sets out the policy of Hire and Rental Association Limited (ACN 093 630 847) and its related entities (referred to throughout this policy as “HRIA”, “we”, “us”, and “our”) with respect to the way we collect, use, and disclose information about you, including through our website, www.hireandrental.com.au. We adopt and are bound by the Australian Privacy Principles contained within the *Privacy Act 1988* (Cth).

We understand and appreciate that you are concerned about privacy, particularly in relation to the use and disclosure of your Personal Information. We are committed to providing a high level of privacy in relation to all Personal Information that we collected.

SCOPE OF THIS POLICY

This Privacy Policy covers Personal Information that we collect, use, and/or disclose in relation to any of the following:

- users of our website;
- HRIA members and applicants for membership;
- other parties that we come into contact with in the course of providing members services and products;
- our suppliers or prospective suppliers;
- any agent acting on our behalf; and
- independent contractors or any person who applies to become an independent contractor engaged by HRIA.

This Policy does not apply to other companies or organisations or websites to which our website is linked.

PERSONAL AND SENSITIVE INFORMATION

For the purposes of this Privacy Policy, ‘Personal Information’ is information or an opinion about you (or which reasonably identifies you), whether the information or opinion is true or whether or not it is recorded in a material form.

For the purposes of this Policy, ‘Sensitive Information’ is Personal Information about a person’s race or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliation, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information, or biometric information or templates.

We aim to collect Personal Information only if it is reasonably necessary for us to provide services or products, perform an obligation, or provide requested information. The type of Personal Information that we collect may differ depending on whether you are (or would like to become) a user of our websites or Social Media Sites, HRIA member, supplier, agent, or independent contractor.

Generally, the Personal Information that we collect will include your name, address, telephone number, facsimile number, email address, and banking or credit card details. If relevant, we may ask

for your date of birth. We may also require detail of your company's ABN and/or ACN, financial information (including information relating to your solvency or creditworthiness), or details of your business.

If you access our website or Social Media Sites, we may collect additional Personal Information in the form of your IP address and domain name.

In some circumstances you may deal with us anonymously or using a pseudonym, however, in most circumstances, if you do not provide us with the Personal Information that we require, or if you provide it in a way that does not identify you, we are unlikely to be able to provide the services, products, information, or assistance that you have requested.

ACCEPTANCE OF THIS PRIVACY POLICY

You accept this Privacy Policy and consent to HRIA collecting, using, and disclosing your Personal Information in accordance with this Privacy Policy by taking any one or more of the following actions:

- visiting any website or social media site established by us, including but not limited to, Facebook, LinkedIn and YouTube (**Social Media Site**);
- applying to become a HRIA member;
- making enquiries (including via telephone, email, internet, or in person) in respect of HRIA's services or products;
- making enquiries or applying to become an independent contractor, or supplier of HRIA;
- attending HRIA's offices;
- providing us with your contact details or any other Personal Information;
- uploading or posting any material to any website established by HRIA;
- participating in any activity on a Social Media Site including, but not limited to, entering competitions, subscribing to any blog, posting, pinning, or uploading any material on any Social Media Site, liking and/or commenting on anything on any Social Media Site; or
- otherwise providing us with Personal Information by any means.

If you do not agree to be bound by this Privacy Policy, you should not access or use this website or take any of the actions listed above.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect Personal Information in a number of ways, including the following:

- when you provide us with Personal Information, including by telephone, email, business cards, application forms, surveys, contracts, or any other document or information provided by you to us by any means;
- when you enquire about membership or our services (including via email or other online enquiry);
- when you access our website or any Social Media Sites;

- from third parties;
- from our members;
- from publicly available sources of information;
- through analysis of Social Media Sites conducted by us or by third parties on our behalf;
- any other collection of or incidental to, or directly or indirectly related to the services and products we may be able to provide to you; and
- from our own records.

When you visit our website, we may make a record of your visit. The following information (which does not identify you) may be logged for statistical purposes and for the purposes of marketing and advertising to you:

- your internet protocol address;
- the date and time of your visit;
- the pages that you have accessed and the documents downloaded; and
- the type of browser you were using.

Tracking technologies such as cookies may be used on our website to:

- recognise a user's browser each time that user visits our site;
- track which pages the user visits whilst on our site; and
- send advertisements to your internet protocol address which are relevant to the pages you have visited.

Cookies are pieces of information that a website transfers to a computer's hard drive for record keeping purposes. Most web browsers are set to accept tracking technologies such as cookies. These tracking technologies do not personally identify the user. If you do not wish to receive any cookies you may set your browser to refuse them, however, your use of our website may be affected.

HOW WE USE YOUR PERSONAL INFORMATION

Generally, we collect and use your Personal Information for the following purposes:

- to supply our membership services and products to you;
- to provide you with effective customer service;
- to promote and market HRIA's business, services, and products;
- to process payments;

- for security, credit, or fraud prevention purposes;
- to process any application that you have made;
- to invite you to participate in surveys and provide us with feedback;
- to manage and monitor the performance of our business and employees, suppliers, agents, and contractors;
- to enforce our terms and conditions, including website Terms of Use; and
- for any other purpose identified in an applicable privacy notice, click-through agreement, or other agreement with you.

Any banking and/or credit card information that we collect shall not be retained by HRIA once that information has been used for its immediately purpose of collection.

We may collect, hold, use, and disclose your Personal Information for any reason which is related to any of the above purposes (**Secondary Purpose**), provided that you have agreed, or that you would reasonably expect, that we may use your Personal Information for that Secondary Purpose. In the case of Sensitive Information, the Secondary Purpose must be directly related to the primary purpose for which we collected such information.

By accepting this Privacy Policy, you agree that the following are (without limitation) Secondary Purposes for which we may collect, hold, use, and disclose your Personal Information:

- to better understand your needs and interests;
- to improve our services and products;
- to improve our marketing and promotion efforts;
- to enforce any legal right that is available to us;
- to perform any legal obligation that we are required to undertake;
- to publish testimonials on our website if a testimonial has been provided by you;
- to prevent, detect, investigate, or remedy any improper conduct;
- to obtain legal advice; and
- to prepare for and/or participate in any legal proceeding (or potential legal proceeding).

DIRECT MARKETING

Your Personal Information may be added to our database. From time to time, your details may be used by us to promote our services (including our 'Red Alert' service) and products, to advise you about upcoming events, and to keep you informed about relevant issues. Directions to unsubscribe from such promotions are provided in each communication. You may unsubscribe from such communications at any time.

DISCLOSING PERSONAL INFORMATION TO THIRD PARTIES

In the conduct and operation of our business, it is necessary for HRIA to use the services of numerous third parties. By accepting this Privacy Policy, you consent to our disclosure of your Personal Information to third parties for the following purposes:

- for any purpose of or incidental to providing our membership services and products to you;
- to refer any request by you for insurance policy purchases or brokerage to Hire Insurance Brokers;
- to our members if you request to the publication of a Red Alert;
- to allow a third party to perform any function that we outsource to them, including in respect of database management, computer systems, payment processing, business analysis, and marketing platforms;
- to allow any third-party vendor to act on our behalf. For example, HRIA may use third-party vendors to conduct surveys or to assist with promotional or marketing efforts;
- to credit reporting agencies or other relevant government authorities in the event of any default in payment;
- for any purpose of or incidental to the sale of any part of our business, including disclosure of Personal Information to prospective purchasers and their legal and accounting representatives;
- to advertise our services and products to the general public –for example, via media when photographs or videos are used in advertising material or campaigns;
- any other purpose or reason that is required by law.

HRIA will not disclose your Personal Information to any third party without your prior consent (either express or implied), where such consent is required by law.

HRIA members agree and acknowledge that:

- HRIA's members include (1) members whose business includes the hiring or rental of equipment to end users (**Equipment Hire Members**), and (2) members whose business includes the sale of equipment and/or software to Equipment Hire Members (**Equipment Supply Members**);
- upon request, HRIA will provide details of its Equipment Hire Member (including Personal Information such as name, address, and contact details) to Equipment Supply Members. By accepting this Privacy Policy, Equipment Hire Members agree and consent to such use and disclosure of their Personal Information;
- HRIA will make details of Equipment Supply Members (including Personal Information such as name, address, and contact details) available to HRIA members via HRIA's website. By accepting this Privacy Policy, Equipment Supply Members agree and consent to such use and disclosure of their Personal Information; and
- HRIA will provide details of its members (including Personal Information such as name, address, and contact details) to its preferred energy supplier, Choice Energy, for the purpose of facilitating potential energy sales. By accepting this Privacy Policy, HRIA members agree and consent to such use and disclosure of their Personal Information.

CROSS BORDER DISCLOSURE

The only circumstance where HRIA will disclose Personal Information to parties outside of Australia will be disclosure to current HRIA members that operate in a foreign country (each of which will have agreed to abide by the HRIA Code of Conduct, including this Privacy Policy).

HOW HRIA PROTECTS YOUR PERSONAL INFORMATION

We are committed to ensuring the security of your Personal Information and we will take all reasonable steps to protect this Information from misuse, interference, loss, unauthorised access, modification or disclosure, including:

- having robust physical security of our premises and databases/records;
- limiting non-essential access to Personal Information by our personnel; and
- technological measures, such as passwords, data back-up, anti-virus and anti-malware software and firewalls.

Please note that our website does not provide systems for secure transmission of Personal Information across the internet, except where otherwise indicated. When emailing or providing Personal Information to us via our website, please be aware that there are risks involved in transmitting Personal Information via the internet.

Our website, Social Media Sites, or correspondence may contain links to other websites. We have no control over the privacy practices employed at other websites and we accept no responsibility for Personal Information that is provided via unsecured websites.

We cannot provide a guarantee with respect to the security of your Personal Information and we will not be liable for any breach of security or unintended loss or disclosure due to our website being linked to the internet.

HOW TO ACCESS, UPDATE OR CORRECT YOUR PERSONAL INFORMATION

To access, update, or correct the Personal Information that we hold about you, please contact the Privacy Officer at the contact details provided below. We will respond to you within a reasonable time. We may ask you for additional information to verify your identity. In most cases, we will provide access and correct or delete any inaccurate information that you discover. In some cases, however, we may limit or deny your request, including where:

- the law permits or requires us to do so;
- we are unable to verify your identity;
- providing access would pose a serious threat to the life or health of a person;
- providing access would create an unreasonable impact on the privacy of others;
- the request is frivolous or vexatious;
- the request relates to existing or anticipated legal proceedings;
- access would prejudice law enforcement activities; or

- granting access would disclose commercially sensitive information or decision making processes.

Any request to access the Personal Information that we hold about you will be governed by the following principles:

- all requests for access will be treated seriously;
- all requests will be dealt with promptly;
- all requests will be dealt with in a confidential manner; and
- your request to access Personal Information will not affect your existing obligations or any commercial arrangements between HRIA and you.

HRIA may impose the following charges when responding to your request for access to your Personal Information:

- photocopying - \$1 per sheet; and
- costs reasonably incurred by HRIA to access and/or deliver Personal Information that is stored off-site or electronically.
- costs reasonable incurred by HRIA to access to electronic databases.

COMPLAINTS

If you believe that we have not complied with our obligations under the Australian Privacy Principles, or if you have a complaint about our use or disclosure of your Personal Information, please contact our Privacy Officer.

Our Privacy Officer is responsible for liaising with you to ensure that the issues you have raised are fully examined and that your complaint is handled in accordance with this process. We will treat the process, and all the details of your complaint, in strict confidence. If we need to discuss any issues arising from your complaint with a third party, we will obtain your consent first.

HRIA's conduct under this Policy will be governed by the following principles at all times:

- all complaints will be treated seriously;
- all complaints will be dealt with promptly;
- all complaints will be dealt with in a confidential manner;
- the privacy complaint will not affect your existing obligations or the commercial arrangements that exist between HRIA and you.

We will endeavour to resolve your complaint as soon as possible, but the length of time will depend on the nature and complexity of the issues you have raised.

After assessing your complaint, we will decide what action (if any) we should take in response. Some of the things that we may decide to do include:

- taking steps to rectify the problem or issue you have raised;
- requesting further information and conducting investigation;
- providing you with additional information or advice so you can understand what happened and how we have dealt with it; and/or
- taking steps to change our policies or procedures if your complaint identifies a problem in the way we are doing things.

If the Privacy Officer is unable to resolve your complaint, the matter will be referred to HRIA's National Board of Directors.

If we have not resolved a complaint to your satisfaction, you may wish to escalate the matter to the Privacy Commissioner via an online privacy complaint form which can be found at: <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

HRIA may be unable to deal with anonymous complaints as we may be unable to investigate properly and follow-up such complaints, however, if an anonymous complaint is received, HRIA will note the issues raised and try to resolve them appropriately.

NOTIFICATION OF CHANGES

HRIA takes all reasonable steps to ensure that the Personal Information that we hold is accurate and up-to-date. You must notify us as soon as reasonably practicable of any changes to the Personal Information that you have provided to us, or if you are aware of any inaccurate, out of date, misleading or false Personal Information.

CHANGES TO PRIVACY POLICY

From time to time we may decide to amend or update this Privacy Policy. When this occurs, we will post the new version of the Privacy Policy on our website. We encourage you to review this Policy from time to time so that you remain informed as to how we are collecting, using, disclosing, and protecting your Personal Information.

PRIVACY OFFICER DETAILS

Telephone No.: (02) 9998 2255

Email: info@hria.com.au

Postal Address: PO Box 1304, Mona Vale, NSW 1660