

ACCESS POLICY – BENT & CURVED GLASS

How we provide access to your personal information

Purpose

The purpose of this Policy is to set out how Bent & Curved Glass Pty Ltd (ABN 81 003 862 182) and its Associated Companies (“**Bent & Curved Glass**” or “**we**”) will provide you with access to your personal information. The Access Policy is part of our Privacy Policy and our commitment to maintain and give effect to your right to privacy.

Associated Companies

An Associated Company means any subsidiary corporation or any Related Body Corporate (as that term is used in the *Corporations Act 2001* (Cth)).

Overriding principles

At all times conduct under this Policy will be governed by the following principles:

- all requests will be dealt with promptly and in a confidential manner;
- any inaccurate or out of date information will be corrected; and
- your request to access your personal information will not affect any commercial or professional arrangements between you and Bent & Curved Pty Ltd.

How to obtain access?

We will provide access by allowing you to inspect, take notes of or receive copies or print outs of the personal information that we hold about you. To obtain access please make your request in writing, addressed to our Privacy Officer, details of which are set out below:

Mr Joseph Finn
Bent & Curved Glass Pty Ltd
25 Daisy Street
REVESBY NSW 2212
Telephone: (02) 9773 1022
Facsimile: (02) 9773 1055

For security reasons you will be required to put your request in writing and provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

If you are able to establish that the personal information we hold about you is not accurate, complete or up to date we will take all reasonable steps to correct our records.

When will Access be denied?

Access will be denied if:

- the request does not relate to the personal information of the person making the request;
- providing access would pose a serious and imminent 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 and vexatious;
- the request relates to existing or anticipated legal proceedings;
- providing access would prejudice negotiations with the individual making the request;
- access would be unlawful;
- denial of access is authorised or required by law;
- access would prejudice law enforcement activities;
- access discloses a ‘commercially sensitive’ decision making process or information; or
- any other reason that is provided for in the National Privacy Principles or in the *Privacy Act 1988* (Cth).

If we deny access to information we will set our reasons for denying access. Where there is a dispute about your right of access to information or forms of access, this will be dealt with in accordance with our Complaints Policy.

Time

We will take all reasonable steps to provide access or the information requested within 14 days of your request. In situations where the request is complicated or requires access to a large volume of information, we will take all reasonable steps to provide access or the information requested within 30 days.

Cost and Charges

Bent & Curved Glass may charge you reasonable fees to reimburse us for costs we incur relating to your request for access to information, including in relation to:

- photocopying; and
- delivery cost of information stored off site.

For current fees, please contact Bent & Curved Glass' Privacy Officer (details set out above).

Joseph Finn
Privacy Officer
October 2013

COMPLAINTS POLICY – BENT & CURVED GLASS

How we handle privacy complaints

Bent & Curved Glass Pty Ltd (ABN 81 003 862 182) and its Associated Companies (“**Bent & Curved Glass**” or “**we**”) has developed this Complaints Policy as part of its Privacy Policy.

Associated Companies

An Associated Company means any subsidiary corporation or any Related Body Corporate (as that term is used in the *Corporations Act 2001 (Cth)*).

Who may lodge a complaint under this Policy?

If you have provided us with personal information, or we have collected and hold your personal information, you have a right to make a complaint and have it investigated and dealt with under this Policy.

What is a “privacy” complaint?

A privacy complaint relates to any concern that you may have regarding Bent & Curved Glass’ privacy practices or our handling of your personal information. This could include matters such as:

- how your personal information is collected or stored;
- how your personal information is used or disclosed; and
- how access is provided to your personal information.

What do I do if I have a complaint about the privacy practices of Bent & Curved Glass?

If you have a complaint about Bent & Curved Glass’ privacy practices or our handling of your personal information please contact our Privacy Officer. We try to resolve complaints at the local level if possible.

You may complain in writing to our Privacy Officer, as follows:

Mr Joseph Finn
Bent & Curved Glass Pty Ltd
25 Daisy Street
REVESBY NSW 2212
Telephone: (02) 9773 1022
Facsimile: (02) 9773 1055

Complaint resolution procedure

The goal of this policy is to achieve an effective resolution of your complaint within a reasonable timeframe, usually 30 days or as soon as practicable. However, in some cases, particularly if the matter is complex, the resolution may take longer.

Once the complaint has been made, we will try to resolve the matter in a number of ways:

1. **Request for further information:** We may request further information from you. You should be prepared to provide us with as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and determine an appropriate solution. All details provided will be kept confidential.
2. **Discuss options:** We will discuss options for resolution with you and if you have suggestions about how the matter might be resolved you should raise these with our Privacy Officer.
3. **Investigation:** Where necessary, the complaint will be investigated. We will try to do so within a reasonable time frame. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.
4. **Conduct of our employees:** If your complaint involves the conduct of our employees we will raise the matter with the employee concerned and seek their comment and input in the resolution of the complaint.
5. **Escalate internally:** If your complaint is not able to be resolved at a local level it will be referred to company directors.

6. The complaint is substantiated: If your complaint is found to be substantiated, you will be informed of this. We will then take appropriate agreed steps to resolve the complaint, address your concerns and prevent the problem from recurring.
7. If the complaint is not substantiated, or cannot be resolved to your satisfaction, but this Policy has been followed, the decision may be referred to an appropriate intermediary. For example, this may mean an appropriately qualified lawyer or an agreed third party, to act as a mediator.
8. At the conclusion of the complaint, if you are still not satisfied with the outcome you are free to take your complaint to the Office of the Federal Privacy Commissioner.

We will keep a record of your complaint and the outcome.

Anonymous complaints

We are unable to deal with anonymous complaints. This is because we are unable to investigate and follow-up such complaints. However, in the event that an anonymous complaint is received we will note the issues raised and, where appropriate, try and resolve them.

Joseph Finn
Privacy Officer
October 2013

PRIVACY POLICY – BENT & CURVED GLASS

Our Commitment

Bent & Curved Glass Pty Limited (ABN 81 003 862 182) and any Related Companies (“**Bent & Curved Glass**” or “**we**”) are committed to providing you with the highest levels of professional service. This includes protecting your privacy in accordance with the *Privacy Act* 1988 (“**Act**”). We understand the importance placed on the privacy of your personal information.

Bent & Curved Glass will take all reasonable steps to protect the privacy of the personal information that we collect, use or disclose. Our Privacy Policy sets out how we intend to do so. This Policy applies to all clients, suppliers, job applicants, prospective employees and any other individual who provides us with personal information. This Policy does not apply to acts and practices of Bent & Curved Glass which relate directly to the employee records of Bent & Curved Glass’ current and former employees.

What is personal information?

Personal information is any information that can be used to identify you. This includes any personal information or opinions about you, whether true or not, no matter how the information or opinions are recorded.

Sensitive information is a special category of personal information and includes, but is not limited to, information about your health, race or ethnic origin, political or religious beliefs, membership of a trade union or association, or criminal record. We will not disclose your sensitive information without your consent, unless there is a need to disclose such information in accordance with the Act or to comply with any other legislation.

Why do we collect personal information?

We collect personal information from our current and prospective clients and suppliers in connection with providing unique and specialist glass products and services to them and to deliver the best possible service to our clients.

We may also collect and use personal information for the following purposes:

- To respond to requests for information from individuals about our products and/or services and/or providing other information;
- To update or add information to our database of clients and/or suppliers;
- To enter into contracts for the provision of products and/or services to clients;
- To enter into contracts to receive products and/or services from suppliers;
- When considering making offers to job applicants and prospective employees or for employment purposes;
- To market and promote our products and services to you;
- To receive services from you or the organisation which employs you; and
- To inform you of upcoming events, developments and activities.

Collection of personal information

Bent & Curved Glass collects personal information necessary to lawfully and ethically carry on its business of glass production and the sale of unique glass products. If you would like to access any of our services on an anonymous basis, please tell us. If this is possible and lawful, we will take all reasonable steps to comply with your request. However, we may not be able to provide the services or supply the product in question if we are not provided with the personal information requested.

What personal information do we collect and use?

Personal information that we collect and use may include your name, position, date of birth, current address, facsimile numbers, email address, telephone numbers, next of kin, tax file number, proof of eligibility to work in Australia, education details, Australian Business Number, bank details, business references, financial details, marital status, details about your business and drivers licence number.

The personal information that we collect and hold usually falls into one of the following categories:

- personal information relating to our current and prospective clients and/or clients’ employees in the course of conducting our business of providing glass products and services;

- personal information about our suppliers and/or suppliers' employees in the course of conducting our business of providing glass products and services;
- personal information obtained to assist in managing and building client, supplier and other business relationships;
- personal information, including name and contact information of persons consenting to receive marketing and other promotional material on their or their employer's behalf;
- personal information about job applicants or prospective employees in connection with applications for employment or work; and
- information and opinions from referees of job applicants or prospective employees.

We will not use your personal information in a manner contrary to the Act or this Policy, nor for any purpose for which you would not reasonably expect us to use your personal information.

Updating of personal information or inaccuracy

We will take all reasonable steps to ensure that the personal information that we hold is accurate and up to date. If you feel that information we hold about you is not accurate or up to date, or your details have or are about to change, please inform us and we will correct or update your personal information.

How do we collect personal information?

Where possible, we collect your personal information directly from you. If you feel that the information that we are requesting, either on our forms or in our discussions with you, is not information that you wish to provide, please feel free to raise this with us.

In some situations we may also obtain personal information about you, from a third party source. If we collect information about you in this way, we will take reasonable steps to contact you and ensure that you are aware of the purposes for which we are collecting your personal information and the organisations to which we may disclose your information, subject to any exceptions under the Act.

When do we disclose your personal information?

We will use and disclose your personal information for the purpose for which it was collected. We may also use and disclose it for related or ancillary purposes such as for the development and marketing of new products and/or services, invoicing or providing further information about other product and/or services offered by us.

For the purposes referred to in this Policy we may disclose your personal information to:

- your referees or your former employers;
- credit agencies or financial institutions;
- our professional advisors including our accountants, auditors and lawyers; and
- our related companies and our contractors and suppliers (for example our IT database contractors).

Do we send information overseas?

We do not usually send personal information out of Australia. If you need us to send information to another country we will do so with your consent. If we are otherwise required to send information overseas we will take measures to protect your personal information. We will protect your personal information either by ensuring that the country of destination has similar protections in relation to privacy or that we enter into contractual arrangements with the recipient of your personal information that safeguards your privacy.

Access to and correction of your personal information

You have a right to access and copy your personal information, subject to certain exceptions provided for in the Act. If you would like to access your personal information please follow the procedures set out in our Access Policy. Our Access Policy can be accessed on our website (www.bentglass.com.au) or by contacting our Privacy Officer. For security reasons, you will be required to put your request in writing and provide proof of your identity. If you are able to establish that personal information we hold about you is not accurate, complete or up to date we will take all reasonable steps to correct our records. We will charge a fee for photocopying any information requested by you.

Security of your information

We will take all reasonable steps to secure your personal information. Electronic information is protected by various security measures and access to information and databases is restricted to staff of Bent & Curved Glass that need access to the information, in order to perform their duties. All our staff are bound by obligations of confidentiality.

Others who may have access to your personal information

Sometimes we may use external service providers to perform certain necessary functions and, in performing such functions, these service providers may have access to some of the personal information which we collect. The service providers are bound by obligations of confidentiality and may only have access to the information to the extent to which they require same, for the proper and due performance of their obligations as service providers.

Complaints

We have a Complaints Policy for dealing with your privacy complaints. The purpose of the Complaints Policy is to ensure that any person that has a complaint with the way their personal information is collected, used, disclosed, stored and administered may lodge a complaint under the Complaints Policy. All complaints will be treated seriously and dealt with promptly. The Complaints Policy is our way of ensuring your privacy concerns are raised and addressed promptly. Our Complaints Policy can be accessed on our website (www.bentglass.com.au) or by contacting our Privacy Officer, Joseph Finn.

Our website

A person may use our website anonymously but any information which a person chooses to submit to us will be treated in accordance with this Policy.

Our internet service provider may record details of visits to our site and when visiting our site your visit will/may be logged and the following information collected:

- The visitor's server address, domain name and browser type;
- The date and time of the visit to the site;
- The pages accessed and the documents downloaded;
- The previous website visited;
- The user's operating or browser system; and
- The links followed from other sites to get to the current site.

The information listed above is collected for statistical and research purposes only and will be utilised internally by Bent & Curved Glass. There may be occasions when a law enforcement agency or other government agency may exercise its legal authority to access, review or use this information.

How to contact us

If you would like more information on privacy or have any questions in relation to this Policy please contact our Privacy Officer, Joseph Finn. We can be contacted by telephone, mail or facsimile as follows:

- Bent & Curved Glass, 25 Daisy Street, Revesby, NSW 2212;
- Telephone: (02) 9773 1022; and
- Facsimile: (02) 9773 1055.

We reserve the right to review, and if necessary, change this Policy.

Joseph Finn
Privacy Officer
Bent & Curved Glass Pty Limited
October 2013