



Privacy Policy

V1.20250123



Document Control

Prepared By: Richard Grace

Authorised By: Ron Rosenbaum

Revision

Version	Date Release	Pages Affected	Remarks
1.0	23/1/2025	All	Updated format

Proposal Confidentiality Statement

All information in this document is provided on a commercial-in-confidence basis, as its release may benefit our competitors and harm our businesses.

This document and any electronic version thereof may only be copied and/or provided to your employees on a need-to-know basis for the purpose of evaluating this response or as a result of involvement in the project at a later date. It may not be provided to any other organisation, competitor of The IT Agency, service provider, or contractor without the prior written permission of The IT Agency.



Contents

1	Privacy policy	3
1.1	Collection of personal information	3
1.2	Potential breaches of privacy	3
1.3	Disclosure to third parties	5
1.4	Disclosure to credit reporter	5
1.5	Access to and correcting personal information	6
1.6	Registering a breach complaint	6
1.7	Disclosure to overseas recipients	6
1.8	Availability Of This Privacy Policy Manual	6
1.9	Privacy Officer	7

1 Privacy policy

1.1 Collection of personal information

- 1.1.1** The IT Agency Pty Ltd collects personal information for a variety of reasons. This personal information will be collected in the normal course of business and will relate to Goods and/or Services that are provided by The IT Agency Pty Ltd to Clients. This information collected will be done so during business where the Client is a customer of The IT Agency Pty Ltd or when the Client acts as a guarantor for another person or company that is a Client of The IT Agency Pty Ltd. The IT Agency Pty Ltd will not collect information that is not relevant or sensitive in nature unless it is required in the normal course of business.
- 1.1.2** The personal information that is collected may include, but will not be limited to the following:
- (a) full name
 - (b) address
 - (c) date of birth
 - (d) credit references if applicable
 - (e) publicly available information which relate to the Client's activities in Australia
 - (f) any information recorded in the National Personal Insolvency Index
 - (g) the Client acknowledges that provided the correct Privacy Act disclosures have been made that The IT Agency Pty Ltd may conduct a credit report on the Client for the purposes of evaluating the credit worthiness of the Client.
 - (h) driver's license details if applicable
 - (i) electronic contact details including email, Facebook, and Twitter if applicable
 - (j) contact information if applicable
- 1.1.3** The IT Agency Pty Ltd ensures that all personal information is held in a secure manner. Where applicable and to the best of The IT Agency Pty Ltd's knowledge all computers or servers have the required security protections in place to safeguard and protect any personal information that is held by The IT Agency Pty Ltd.
- 1.1.4** We do not use cookies on our websites.
- 1.1.5** The IT Agency Pty Ltd also regularly conducts internal risk management reviews to ensure that its infrastructure (to the best of its knowledge) is secure, and any identifiable risks have been mitigated as much as they can be in the normal course of business.

1.2 Potential breaches of privacy

- 1.2.1** In accordance with the Notifiable Data Breach The IT Agency Pty Ltd is aware of its responsibilities to notify its Clients in the event of a potential data breach that may cause serious harm to Clients. Further, in the event the Client is in the Europe Union ('EU'), The IT Agency Pty Ltd acknowledges that any potential data breaches will be

safeguarded by the provisions of the EU's GDPR (General Data Protection Regulation).

- 1.2.2** The IT Agency Pty Ltd will collect and process personal information in the normal course of business. This personal information may be collected and processed, but is not limited to, any of the following methods:
- (a) Credit applications forms.
 - (b) Work authorisation forms, quote forms or any other business documentation.
 - (c) Publicly available databases that hold information.
 - (d) Websites that detail information such as Sensis, Facebook, Google etc.
 - (e) By verbally asking you for information as part of normal business practices.
- 1.2.3** Where relevant to data processing as per the GDPR, and in particular where The IT Agency Pty Ltd uses new technologies, and takes into account the nature, scope, context and purposes of processing and considers that the data processing is likely to result in a high risk to the rights and freedoms of natural persons, the Privacy Officer shall, prior to the processing of personal information, carry out an assessment of impact of the envisaged processing operations on the protection impact assessment. The data protection assessment will be required in instances whereby:
- (a) a systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing, including profiling, and on which decisions are based that produce legal effects concerning the natural person or similarly significantly affect the natural person.
 - (b) processing on a large scale of special categories of data referred to in Article 9(1) of the GDPR, or of personal data relating to criminal convictions and offences referred to in Article 10 of the GDPR.
 - (c) a systematic monitoring of a publicly accessible area on a large scale.
- 1.2.4** The assessment shall be carried out in accordance with Article 35 (7) of the GDPR and carry out reviews of such data protection impact assessments when there is any change of the risk associated with the processing of personal information.
- 1.2.5** As a Client of The IT Agency Pty Ltd and agreeing to The IT Agency Pty Ltd's Terms and Conditions of Trade, which comprises of The IT Agency Pty Ltd's privacy statement you hereby agree and consent to the provisions of this Privacy Policy Manual, including but not limited to the collection, processing, use and disclosure of your personal information. If you do not wish to agree or consent to any of the above use, processing collection and disclosure, then The IT Agency Pty Ltd warrants that any request by you to withdraw your consent or agreement shall be deemed as confirmation by you to cease any and/or all collection use, processing, and disclosure of your personal information. You may make a request to withdraw your consent at any time by telephone and/or by email to the Privacy Officer.
- 1.2.6** The IT Agency Pty Ltd will ensure that any Information that is to be obtained from you is done so using The IT Agency Pty Ltd's prescribed forms which authorise The IT Agency Pty Ltd:
- (a) To collect personal information.



- (b) Inform the individual what personal information is being collected.
- (c) Inform the individual why (the purpose) the personal information is being collected.
- (d) Inform the individual why & when personal information will be disclosed to 3rd parties.

1.2.7 It is the responsibility of The IT Agency Pty Ltd to ensure that any personal information obtained is as accurate and up to date as possible and information is only collected by lawful means in accordance with the Act and relevantly, in accordance with the GDPR.

1.3 Disclosure to third parties

1.3.1 The IT Agency Pty Ltd will not pass on your personal information to third parties without first obtaining your consent.

1.3.2 In accordance with the Act, and relevantly the GDPR, Personal Information can only be used by The IT Agency Pty Ltd for the following purposes:

- (a) Access a credit reporter's database for the following purposes:
 - i. To assess your application for a credit account.
 - ii. To assess your ongoing credit facility.
 - iii. To notify a credit reporter of a default by you.
 - iv. To update your details listed on a credit reporter's database.
- (b) Check trade references noted on the prescribed form for the following purposes:
 - i. To assess your application for a credit account.
 - ii. To assess your ongoing credit facility.
 - iii. To notify a default.
- (c) Market The IT Agency Pty Ltd's products and services.
- (d) Any other day to day business purposes such as complying with ATO requirements, managing accounting returns or legal matters.

1.4 Disclosure to credit reporter

1.4.1 If notification of a default has been reported to a Credit Reporter and your credit file has been updated (including any changes to the balance outstanding or contact details), then the Credit Reporter shall be notified as soon as practical of any such changes.

1.4.2 The IT Agency Pty Ltd will only gather information for its particular purpose (primary purpose). In accordance with the Act, and relevantly the GDPR The IT Agency Pty Ltd will not disclose this information for any other purpose unless this has been agreed to by both parties.

1.5 Access to and correcting personal information

- 1.5.1 You shall have the right to request from The IT Agency Pty Ltd a copy of all the information about you that is retained by The IT Agency Pty Ltd. You also have the right to request (by telephone and/or by email) that The IT Agency Pty Ltd correct any information that is incorrect, outdated, or inaccurate.
- 1.5.2 Any requests to receive your personal information or to correct personal information should be directed to the Privacy Officer.
- 1.5.3 The IT Agency Pty Ltd will destroy personal information upon your request (by telephone and/or by email) or when the personal information is no longer required. The exception to this is if the personal information is required to fulfil the purpose of The IT Agency Pty Ltd or is required to be maintained and/or stored in accordance with the law.

1.6 Registering a breach complaint

- 1.6.1 You can make a complaint to The IT Agency Pty Ltd's internal dispute resolution team ('IDR') regarding an interference with and/or misuse of your personal information by contacting The IT Agency Pty Ltd via telephone or email.
- 1.6.2 Any complaints should be directed to the Privacy Officer in the first instance.
- 1.6.3 In your communication you should detail to The IT Agency Pty Ltd the nature of your complaint and how you would like The IT Agency Pty Ltd to rectify your complaint.
- 1.6.4 We will respond to that complaint within 7 days of receipt and will take all reasonable steps to decide as to the complaint within 30 days of receipt of the complaint.
- 1.6.5 We will disclose information in relation to the complaint to any relevant credit provider and or CRB that holds the personal information the subject of the complaint.
- 1.6.6 If you are not satisfied with the resolution provided, then you can make a complaint to the Information Commissioner on the OAIC website at www.oaic.gov.au

1.7 Disclosure to overseas recipients

- 1.7.1 The IT Agency Pty Ltd does not disclose information about the Client to third party overseas recipients unless the Client has provided its consent. The IT Agency Pty Ltd will notify you if circumstances change regarding overseas disclosure and will comply with the Act and the GDPR in all respects.
- 1.7.2 Unless otherwise agreed, The IT Agency Pty Ltd agrees not to disclose any personal information about the Client for the purpose of direct marketing. You have the right to request (by telephone and/or by email) that The IT Agency Pty Ltd does not disclose any personal information about you for the purpose of direct marketing.

1.8 Availability Of This Privacy Policy Manual

- 1.8.1 The full Privacy Policy manual is available to all Clients of The IT Agency Pty Ltd. It will be made available (where applicable) on The IT Agency Pty Ltd's website.



1.8.2 This manual will also be available upon request at The IT Agency Pty Ltd's business premises and is available to be sent to you if required.

1.8.3 If you require a copy of this Privacy Policy, please make your request to the Privacy Officer in the first instance.

1.9 Privacy Officer

Richard Grace
The IT Agency Pty Ltd
Suite 48/14 Narabang Way
Belrose NSW 2085
privacy@theitagency.com.au
(02) 83174730

