

Royal International Commerce Pty Ltd Unit 3 / 153-163 Beauchamp Road, Matraville NSW 2036 Phone: 02 8018 7456 ABN 68 605 424 851

# **PRIVACY POLICY**

# **1.Privacy Policy**

- **1.1** Royal International Commerce Pty Ltd ACN 605 424 851 (ABN 68 605 424 851) ("**Royal**") takes all reasonable steps to implement processes and procedures to safeguard Personal Information. While not claiming to be a statement of compliance, this Privacy Policy outlines Royal's use, collection, and storage of Personal Information in accordance with the Australian Privacy Principles contained in the *Privacy Act* 1988 (as amended).
- **1.2** This Privacy Policy applies to all Personal Information collected by Royal in the course of providing goods and services to Customers (**Customers**) regardless of the source of that Personal Information. This Privacy Policy may be available at <a href="http://www.royalinternational.net.au/">http://www.royalinternational.net.au/</a>.
- **1.3** This Privacy Policy should be read in conjunction with the Terms and Conditions of Royal which may be available at <a href="http://www.royalinternational.net.au/">http://www.royalinternational.net.au/</a>.

# **1.4 Definitions**

*Personal Information* means information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not.

*Privacy Policy* means this privacy policy and amendments made to it.

# 2. Collection of Personal Information

# 2.1. Personal Information

Royal collects Personal Information about Customers and potential Customers to provide the Customers with the goods and services they have requested. If this information is not provided, Royal may not be able to provide Customers with the requested goods and/or services. Royal endeavours to collect Personal Information from Customers directly.

Personal Information Royal obtains from third parties or publicly available information is limited to circumstances where the Customer has consented whether that be expressly or impliedly.

# 2.2 Types of Personal Information Collected

Personal Information Royal collects includes a person's first and last names, email address, business name and any other Personal Information supplied to them.

## 2.3 Purpose of collection and use

Royal collects, holds, uses, and discloses the Personal Information to deliver and improve the goods and services Royal provides to Customers. Generally, Customers are only obliged to provide Royal with information necessary for Royal to provide goods and services to the Customer. However, if Customers do not provide Royal with certain types of Personal Information, Royal may be unable to provide the Customer the goods and services they have requested.

## 3.Access, correction, and complaints procedure

## 3.1 Accessing Personal Information about you

If a Customer would like to access or correct any Personal Information that Royal holds about them, please contact:

Royal International Commerce Pty Ltd Unit 3 / 153-163 Beauchamp Road Matraville NSW 2036 Email: <u>accounts@royalinternational.net.au</u>

The Customer will need to identify themselves to the reasonable satisfaction of Royal before it will provide the Customer with Personal Information about an individual which Royal may or may not have in its possession.

#### **3.2 Complaints procedure**

If a Customer has a complaint about Royal's collection or use of Personal Information pertaining to that Customer, then the Customer is requested to contact Royal at first instance.

After investigating the Customer's complaint and reporting to the Customer about an alleged breach of the Australian Privacy Principles and reporting the results of Royal's investigations to the Customer, the Customer is not satisfied, then Royal requests that the Customer consult:

The Australian Information Privacy Commissioner GPO Box 5218 SYDNEY NSW 2001 Telephone: 1300 363 992 Email: <u>enquiries@oaic.gov.au</u>

A complaint form can be found at: <u>https://forms.business.gov.au/smartforms/landing.htm?formCode=APC\_PC</u>

#### 3.3 Anonymity and use of pseudonyms

Where practical and reasonable to do so, Royal provides Customers with the opportunity to use pseudonyms in relation to information Customers provide to it. Where appropriate Royal will provide Customers with the option to interact anonymously.

#### 3.4 How Royal deals with unsolicited Personal Information

Royal only collects Personal Information about individuals by lawful and fair means.

# 3.5 Notice of Collection of Personal Information

Where possible, Royal notifies the Customers when it is collecting Personal Information about the Customers, the use of which is subject to this Privacy Policy.

# 4.Use of Personal Information in Direct Marketing

# 4.1 Direct Marketing

Royal may use Personal Information for the purposes of promoting goods and services to Customers where they would reasonably expect it to be used for this purpose. If Royal uses a Customer's Personal Information to provide them with promotional and marketing information, Royal will provide the Customer with an option to opt out of this service.

# 4.2 Opting Out

Customers can unsubscribe to Royal's marketing material by clicking on the functional unsubscribe facility contained in an email or can contact The Privacy Officer on the details set out above.

## **5.Integrity of Personal Information**

## 5.1 Security measures taken for Personal Information

Royal takes reasonable steps to protect the Personal Information it holds from misuse and loss and from unauthorised access. Further, Royal takes reasonable steps to destroy or permanently de-identify Personal Information if it is no longer needed for the purpose it was collected.

#### **5.2 Accuracy**

Royal takes reasonable steps to ensure that the Personal Information it collects, uses, or discloses is accurate, complete, and up to date.

#### **5.3 Security**

Royal takes reasonable steps to safeguard the disclosure of Personal Information from third parties, contractors, and staff. Royal has up to date procedures and policies relating to information technology as it relates to staff and strives for best practice in this area. This may include training for staff in relation to privacy, access control of sensitive data, clear communication of policies, procedures, and the importance of respecting privacy guidelines.

#### 6.Changes to Privacy Policy

This Privacy Policy may change from time to time. The current version of this Privacy Policy can be found at <u>http://www.royalinternational.net.au/</u>. This Privacy Policy was last updated on 25 January 2022.