



**TransTank<sup>®</sup>**  
INTERNATIONAL

# PRIVACY POLICY

TRAFFORD GROUP PTY LTD

“HELPING TO DEVELOP AND PROTECT THE LAND”

[www.tti.com.au](http://www.tti.com.au)

# Trafford Group Pty Ltd

## PRIVACY POLICY

### 1) INTRODUCTION

Trafford Group Pty Ltd (ACN 165 797 277) (“**Trafford**”) manages personal information in accordance with the Privacy Act 1988 (Cth) (“**Privacy Act**”) and the Australian Privacy Principles as set out in Schedule 1 of the Privacy Act (“**APP**”).

This Privacy Policy (“**Policy**”) relates to any personal information that Trafford collects, holds, discloses and/or uses via <https://tti.applyeasy.com.au/credit> and <https://www.tti.com.au/> and any related Trafford terms and conditions, website, social media page, internal website or intranet (“**Websites**”) or applications (“**Applications**”) or any other manner.

This Policy incorporates our Credit Reporting Policy which sets out how we use, collect, store and disclose credit information.

This Policy is effective from September 2020.

### CHANGES TO THIS PRIVACY POLICY

Trafford reserve the right to update or change this Policy at any time and you should check this Policy periodically. Your continued use of the service after we post any modifications to this Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

### PERSONAL INFORMATION

Throughout this Policy we refer to “**Personal Information**” which is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

### SENSITIVE INFORMATION

“**Sensitive Information**” is a subset of Personal Information, and includes information or an opinion about a person’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, or health, genetic or biometric information

### 2) WHAT KINDS OF PERSONAL INFORMATION IS COLLECTED AND HELD?

Trafford collects and holds information about Trafford’s employees, contractors who provide us with a service, customers, website users, suppliers, job applicants and other people who may come into contact with us or our businesses from time to time.

### PERSONAL INFORMATION

Examples of Personal Information that may be collected and held by Trafford includes but is not limited to:

- Your first and last name
- Date of birth
- Gender
- Company name and details
- Delivery address, registered address and/or billing address
- Contact phone number
- Mobile phone number
- Email address
- Employment information
- Individual preferences
- Marketing information

- Trade References
- Credit Card details
- Bank account details
- Your signature
- Your IP address
- Credit information/credit eligibility information (for further information see the “Credit

Trafford may also combine your personal information with other information to provide and improve our products, services, content, and advertising.

You are not required to provide the personal information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have. You may be able to deal with Trafford without identifying yourself (for example anonymously or by using a pseudonym) in certain circumstances. Please be aware that this may not be possible for example where Trafford needs to identify you for legal purposes or if it is impracticable to do so.

Trafford collects only personal information that is reasonably necessary for, or directly related to, its functions or activities. The nature and extent of personal information Trafford collects and holds will vary depending on a person’s particular relationship and interaction with Trafford.

### **SENSITIVE INFORMATION**

Trafford will not collect Sensitive Information unless the person to whom it relates consents to the collection of that information, and the information is reasonably necessary for one or more of Trafford’s functions or activities, except where the collection is required or authorised by law, is necessary to prevent or lessen a serious and imminent threat to the Trafford Group Pty Ltd\_Privacy Policy.docx person’s (or another person’s) life or health, or is necessary

in relation to legal proceedings (current, anticipated or potential), or another permitted exception in the Privacy Act applies.

## **3) HOW DO WE COLLECT AND HOLD PERSONAL INFORMATION?**

### **DIRECTLY**

Directly from persons or members when you provide Personal Information. Examples may include when:

- Providing your information for the purpose of applying for credit with Trafford or ordering any of products or services from Trafford including the entering into of any agreement.
- Registering your interest in our products and services at Trafford via our Website or via phone call or email or in person.
- When you interact and/or browse the Website or any Application associated with it generally or for a specific purpose.
- Directly when you subscribe to any newsletter of Trafford.
- When representatives of Trafford such as employees undertake certain business functions for Trafford in the provision of Trafford’s products and services.

### **INDIRECTLY**

#### **THIRD PARTY PROVIDERS**

Data is collected, processed and stored using third party analytics software, that is to the best of our knowledge secure and confidential. Analytical data is used to gain an understanding of user behaviour, perform system critical operations, and in extraordinary

circumstances, for legal reasons. Anonymous user data is shared between third party services in order to gain insight as to aggregate user behaviour.

Analytic data insights are also used to target users through remarketing, demographics, interests and website behaviour. Third party vendors, including but not limited to Google and Facebook may show our ads on sites across the internet. We and third party vendors, including but not limited to Google, make use of third party cookies together in order to inform, optimise and serve ads based on past visits to a website. We make use of demographic data (such as age, gender and interests) obtained through third party tools in order to, but not limited to influence marketing spend and communicate internally and externally the aggregate behaviour.

#### **PUBLIC SOURCES**

When you use some Trafford products, services, or applications or post on a social networking service such as Instagram, Facebook, Twitter or Google, the personal information and content you share is visible to other users and can be read, collected, or used by them and Trafford.

#### **COMBINING/LINKING PERSONAL INFORMATION**

Other than as referred to elsewhere in this Policy, we will not facilitate the merging of personally identifiable information with non-personally identifiable information without prior user consent to that merger to optimise our Website and Website marketing. For example, we may collate Personal Information data and aggregate data for the purpose of comparing marketing costs with revenue on a transactional basis.

#### **PASSIVE COLLECTION OF INFORMATION – DIRECT MARKETING AND BEHAVIOURAL ADVERTISING**

As you navigate through our Websites and access our Applications, certain information can be passively collected (that is, gathered without your actively providing the information) using various technologies, such as cookies, Internet tags or web beacons, and navigational data collection (*log files, server logs, and clickstream data*).

For example, we may collect information about matters including but not limited to the date, time and duration of visits and which pages of a Website or Application are most commonly accessed. This information is generally not linked to the identity of visitors, except where a Website or Application is accessed via links in an email or another electronic message we have sent or where we are able to uniquely identify the device or user accessing a Website or Application, such as when you are logged into an account.

We may share hashed portions of your information with certain strategic partners to make our business more responsive to your interests and/or those of like-minded consumers. For example, we may aggregate your email address together with the email addresses of others who place enquiries on our Website, locally hash such data, and transmit the resulting hashed data to third parties including but not limited to Facebook/LinkedIn/Google for the purpose of creating “Custom Audiences” (where targeted ads are sent to people on Facebook who have already been on our Site), and “Lookalike Audiences” (where targeted ads are sent to people on Facebook/LinkedIn/Google who have similar characteristics to people on our Custom Audience list).

Where we use Personal Information for promotional or direct marketing purposes, a person may at any time request Trafford to not use their Personal Information for sending direct marketing material to that person including if you wish to opt-out of the use of certain hashed portions of your Personal Information. Such a request can be made by contacting Trafford either in writing, by email or by telephone at the contact details below. There is no fee for making such a request.

**Direct marketing** can include for example: Displaying an advertisement on a social media site that an individual is logged into, using Personal Information, including data collected by cookies relating to websites the individual has viewed.<sup>1</sup>

## COOKIES & WEB BEACONS

We use cookies on our Websites. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information. However, once you choose to furnish the Websites with personally identifiable information, this information may be linked to the data stored in the cookie.

We may use web beacons on the Websites from time to time. Web beacons or clear .gifs are small pieces of code placed on a web page to monitor the behaviour and collect data about the visitors viewing a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

## HOW TRAFFORD HOLD INFORMATION

We hold Personal Information electronically and/or in hard copy form, both at our own premises and with the assistance of service providers. Data may be collected, processed and stored using third party software that is to the best of our knowledge secure and confidential.

Trafford retains the information you provide to us including your contact details to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes. This information is held on secure servers in controlled facilities.

## SECURITY

We have systems in place to ensure that information is accessible by our staff on a need-to-know basis.

We act to safeguard the security and privacy of your information, whether you interact with us personally, by telephone, mail, over the internet or other electronic medium. We strive to take reasonable steps to protect the information we hold from misuse, interference, loss and unauthorised access modification or disclosure, however we cannot guarantee its absolute security.

Where the information is of a sensitive nature, we will take particular steps to secure the information.

In certain circumstances we use third party storage providers such as cloud storage and backups to hold information that is stored in soft copy electronic form.

When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information. However most personal information is stored in client files which will be kept for a minimum of seven years.

## 4) THE PURPOSES FOR WHICH WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

Trafford collects Personal Information in various ways in the course of conducting its business, to provide and improve our products, services, content, and advertising including for the purposes of:

- Contacting persons interested or enquiring about the products and services at Trafford
- Providing our products and services to customers
- Providing newsletters to customers via e-mail
- Contacting persons via email with updates
- Responding to customer queries in relation to our products and services
- Interaction with customers who utilise our Website
- To better understand your needs, enabling us to improve our products and services
- To make improvements to the Websites to enhance the user experience
- Promotional and marketing activities
- Monitor the effectiveness of our advertising
- To customise our Websites according to your interests
- Direct Marketing and Behavioural Advertising
- The purposes set out in the “Credit Reporting” section of this Privacy Policy

## 5) HOW CAN YOU CONTROL YOUR PERSONAL INFORMATION?

### ACCESSIBILITY AND CORRECTION OF YOUR INFORMATION

A person may request to access Personal Information about them held by Trafford. Such a request must be made in writing via our contact details below.

Trafford will take reasonable steps to ensure the accuracy and completeness of the Personal Information we hold. However, if a person believes that any Personal Information that we hold about them is inaccurate, out of date or needs correction in anyway, then they should contact Trafford in writing via our contact details below.

Trafford will grant a person access and/or make any corrections to their Personal Information that may be necessary from time to time as soon as possible, subject to the circumstances of the request.

Verification of identity is required with a request to access (or update) Personal Information so that we can ensure your Personal Information is disclosed only to you

### COMPLAINTS

An individual can contact Trafford in relation to lodging a complaint about a breach of the APP, a binding registered APP code or in relation to a credit reporting issue, via our contact details below.

Trafford will make an assessment of the complaint and will respond to you within a reasonable timeframe. Any further action following this initial response will vary depending on the nature of the complaint. If necessary, the complaint may be taken to the Office of the Australian Information Commissioner or to another review body if an external review is required.

## OPT OUTS

There may be options for you to use online services or browser settings to manage behavioural based digital advertising that allow you to opt-out or install blocking programs for example through Google.

You may also opt out of our direct marketing emails by clicking on the link contained in any such emails or by writing to Trafford at [sales@tti.com.au](mailto:sales@tti.com.au).

## FREEDOM OF INFORMATION ACT 1982 (CTH)

An individual also has the right under the Freedom of Information Act 1982 (Cth) to request

access to documents that we hold and ask for information that we hold about that person to

be changed or annotated if it is incomplete, incorrect, out-of-date or misleading.

## 6) CREDIT REPORTING

We may also collect, hold, use and disclose credit information and credit eligibility information about you to:

- Assess and process credit related applications develop our credit assessment and credit worthiness rating system
- Manage credit that we provide
- Assist you to avoid defaults in relation to credit
- Collect overdue payments in relation to credit
- Report serious credit infringements
- Assess the credit worthiness of an applicant to become a guarantor in relation to credit
- Establish and operate our customers' credit accounts

- Obtain credit information about applicants for credit
- Obtain credit references about individuals from their credit providers
- Participate in the credit reporting system
- Allow credit reporting bodies to create and maintain credit information files about
- Individuals and notify defaults to other credit providers, industry credit bureaus and debt collectors
- Deal with complaints or regulatory matters relating to credit or credit reporting
- Assign our debts
- Or otherwise when required or authorised by law.

This includes collecting credit information from or disclosing credit information to credit reporting bodies. They in turn may include it in credit reporting information they provide to other credit providers to assist them to assess your credit worthiness. Credit reporting bodies may use the information in reports provided to credit providers to assist them to assess your credit worthiness. In the event that you default on your payment obligations pursuant to the credit provided to you or commit a serious credit infringement, we may be entitled to disclose this information to a credit reporting body.

### Credit information can include:

- identification information
- details about information requests made about you to credit reporting bodies
- current and historical details about credit applications you have made and credit arrangements you have entered into
- information about overdue payments, default listings and about serious credit infringements and information about payments or subsequent arrangements in relation to either of these

- various publicly available information like bankruptcy and credit-related court judgments
- credit scores or risk assessments indicating an assessment of your credit worthiness.

Credit information relates primarily to your dealings with other credit providers (for example, banks, other financial institutions, or other organisations that may provide you with credit in connection with their products or services). It may also include certain credit worthiness information that we derive from the data that we receive from a credit reporting body.

Sometimes we may collect this information about you from other credit providers.

**You have the right to request credit reporting bodies not to:**

- use your credit reporting information for the purposes of pre-screening of direct marketing from credit providers; and
- use or disclose your credit reporting information if you believe on reasonable grounds that you have been or are likely to be a victim of fraud.

**We primarily use the following credit reporting bodies:**

- **Equifax** (GPO Box 964 North Sydney NSW 2059)
- **Creditor Watch Pty Ltd** (GPO Box 4029 Sydney NSW 2001)

## **7) . DISCLOSURE OF PERSONAL INFORMATION**

Where we receive your personal information and we did not solicit the information we will do our best to notify you of our receipt of your personal information within a reasonable time. If we determine that we could not have received the information under the APP we will use our best endeavours to destroy the information. We may use or disclose the information to make such a determination.

We may disclose your personal information to our related companies, service providers (including credit reporting bodies for the purpose of obtaining credit information upon application for credit with Trafford) and specialist advisers who have been contracted with administrative or other services, insurers, credit providers, a person authorised by you to access the information. We may also disclose personal information to others if you have consented to us doing so or as required to do so by law. We do not guarantee website links or privacy policy of authorised third parties. Trafford or third parties may disclose your personal information to overseas recipients, most likely in circumstances where personal information is disclosed, to an entity which is an overseas recipient, by virtue of the personal information being stored on a third party's cloud based service.

We do not sell, publish or give away your information to any other party where the information could be linked to you without your prior consent. As set out above, when you use some Trafford products, services, Applications or post on a social networking service such as Instagram, Facebook or Twitter if your name, suburb or email address is contained in a public post or your personal preferences set out in a review of our products and services or in relation to Trafford, that information is then public and can be collected and disclosed by Trafford.



## **8) . TRAFFORD CONTACT DETAILS**

Email:  
**admin@tti.com.au**

Postal Address:  
**Privacy Officer  
Trafford Group Pty Ltd  
PO Box 137  
Nathalia, VIC, 3638**

Phone:  
**1800 816 277**