



## PRIVACY POLICY

This Privacy Policy applies to all personal information collected by Robway Safety Pty Ltd being the trustee for Andrew Powell Trust and Gavin Stiffle Trust ABN 99 568 505 482 (**Robway**) and its respective successors and assigns.

In this Privacy Policy, “we” and “us” and similar expressions refers to Robway and “you” and similar expressions refers to any individual about whom we collect personal information.

### 1 What is "personal information"?

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1.1 The *Privacy Act 1988* (Cth) currently defines "personal information" as 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.

1.2 If information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as "personal information" and will not be subject to this privacy policy.

### 2 What information do we collect?

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2.1 The kind of personal information that we collect from you will depend on how you use our website, and our services provided to you. The personal information which we collect and hold about you may include:

- (a) personal details such as your name, phone number, email address and home address.
- (b) your bank account details; and
- (c) details relating to your credit history including but not limited to identification information, repayment history, and default information.

### 3 How we collect your personal information

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3.1 We collect personal information directly from you, your trade references, and credit reporting bodies. We may collect and update your personal information over the phone, by email, over the internet or social media, or in person.

The master document is controlled electronically. Printed copies of this document are not controlled.  
Document users are responsible for ensuring printed copies are valid prior to use.

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- 3.2 We also collect cookies from your computer which enable us to tell when you use our website and to help customise your website experience. A “cookie” is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our websites and on third-party websites. You are not identifiable from such information.
- 3.3 You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.
- 3.4 Should you provide your personal details to us through a recruitment process, we will hold these details on file for a maximum of three months and then delete them. Please advise the Privacy Officer if you wish to have your details removed from our recruitment files immediately. Robway Safety will take reasonable steps to ensure that we hold your personal information in a secure environment accessed only by authorised persons for approved business purposes.

#### **4 Purpose of collection**

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- 4.1 Robway collects personal information reasonably necessary to carry out our business, to assess and manage our clients' needs, and provide services including Elog data services. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you or third parties and managing client relationships.
- 4.2 We customarily disclose personal information only to our service providers who assist us in providing goods and services and operating our website. Your personal information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.

#### **5 Access and correction**

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- 5.1 Australian Privacy Principle 12 permits you to obtain access to the personal information we hold about you in certain circumstances, and Australian Privacy Principle 13 allows you to correct inaccurate personal information subject to certain exceptions. If you would like to obtain such access, please contact us as set out below.
- 5.2 You will not be charged for making a request to access your personal information, but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.
- 5.3 We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up to date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.
- 5.4 However, if you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

- 5.5 We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

## **6 Complaint procedure**

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If you have a complaint concerning the manner in which we maintain the privacy of your personal information, please contact us as set out below. All complaints will be considered by our privacy officer, and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

## **7 Overseas transfer**

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Your personal information will not be disclosed to recipients outside Australia unless you expressly request us to do so. If you request us to transfer your personal information to an overseas recipient, the overseas recipient will not be required to comply with the Australian Privacy Principles, and we will not be liable for any mishandling of your information in such circumstances.

## **8 Your right to anonymity**

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- 8.1 Robway will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for Robway to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in our events, programs, or activities we manage or deliver.

## **9 How to contact us about privacy**

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If you have any queries, or if you seek access to your personal information, or if you have a complaint about our privacy practices, you can contact us as follows:

Robway Safety Privacy Officer  
32 West Thebarton Rd  
Thebarton, South Australia 5031

Phone: +61 8 8238 3500

Email: [accounts@robway.com](mailto:accounts@robway.com)