

VENTORA Group Pty Limited (“VENTORA”) respects your right to privacy. VENTORA is committed to safeguarding the privacy of our customers, employees, and website visitors and adheres to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (“Privacy Act”). This Policy applies to VENTORA and any associated and related companies or businesses (“Affiliates”) and all websites pertaining to VENTORA and/or its Affiliates.

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## 1. ABOUT THIS POLICY

- 1.1. Under the Privacy Act, “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.
- 1.2. This Policy sets out how VENTORA and its Affiliates collect, use, disclose and treat any Personal Information VENTORA may hold about you.
- 1.3. If you do not understand anything in this Privacy Policy, please contact us using our webform on our website.

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## 2. COLLECTION OF PERSONAL INFORMATION

- 2.1. VENTORA will only collect your Personal Information using fair and lawful means as permitted by law or with your consent.
- 2.2. The types of Personal Information VENTORA may collect about you will depend on the nature of your interaction with us. Generally however, VENTORA may collect your name, phone number, address, email address, date of birth, credit card or other payment details, trading arrangements including guarantee documents, credit reports and other credit and trading information concerning you and/or your business.
- 2.3. VENTORA may also collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, navigate our website and/or communicate with our customer support team.
- 2.4. This Personal Information is collected by VENTORA to allow it to generally interact with you and provide you with our products and services. While you are not required to provide VENTORA with any Personal Information (and can refuse to do so), VENTORA may not be able to supply you with products or provide you with certain (or any) services without this information, and your interactions with VENTORA may be limited as a result.
- 2.5. If it is impracticable for VENTORA to deal with you as a result of your decision to not provide us with your Personal Information, we may refuse to do so.
- 2.6. VENTORA may also collect some information that is not Personal Information, because it does not identify you, or anyone else; for example, anonymous answers to surveys or technical information about the use of VENTORA websites.

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## 3. HOW YOUR PERSONAL INFORMATION IS COLLECTED

- 3.1. VENTORA collects personal information from you in a variety of ways, including but not limited to when you:
  - (a) contact us with an enquiry or request a quotation via email, website, telephone or mail or engage with VENTORA and/or its Affiliates via social media;
  - (b) request that we provide our products and/or services to you;
  - (c) apply for a credit account with us ;
  - (d) subscribe to any publication of VENTORA and/or its Affiliates, including electronic publications;
  - (e) provide details to VENTORA and/or its Affiliates in an application, consent form, survey, feedback form or incident report;
  - (f) enter personal information into, or agree to having your personal information entered into, one of VENTORA’s online systems;
  - (g) use our referral service to tell a friend about our websites; and/or
  - (h) apply for employment with VENTORA or a VENTORA Affiliate.
- 3.2. VENTORA will use best efforts to collect Personal Information about you, directly from you. There may be some circumstances, however, where this is impractical or impossible in which case we may collect Personal Information about you from a third party or from publicly available sources. This may include:
  - (a) when you apply for a credit account with us, from credit reporting agencies or organisations that you have nominated as trade references;
  - (b) when you provide our Affiliates with your Personal Information;
  - (c) where you have given us consent to collect your Personal Information from another source;
  - (d) when it is necessary to refer to third parties or publicly available information sources in order to verify any information you have provided us with; and
  - (e) from third parties you have authorised to disclose your information to us, such as if you are the representative of a business.
- 3.3. From time to time, we may receive unsolicited personal information about an individual (such as if a friend has referred you to us). When this occurs, we will review the information received and determine if that information is reasonably required by us to conduct our business or to supply our products or services, and if not, the information will be either securely destroyed or de-identified.

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## 4. USE OF YOUR PERSONAL INFORMATION

- 4.1. VENTORA, and third parties to whom we may disclose Personal Information in accordance with this Privacy Policy, may collect, hold and use your Personal Information to:
- (a) verify your identity;
  - (b) administer and manage our products and services;
  - (c) provide a quotation or provide our products and services to you;
  - (d) research, promote and market our products and services, and special offers (for more information about marketing, see section 6 of this Privacy Policy);
  - (e) help us manage and enhance our product features and service standards;
  - (f) complete background checks and assess your suitability to obtain a credit account with us; or
  - (g) research, develop and improve our products and services.
- 4.2. VENTORA may also use your Personal Information to contact you in the course of providing you with our products or services, including using a variety of measures such as telephone, email, SMS or mail.
- 4.3. We will delete, destroy or completely anonymise any Personal Information we hold when it is no longer relevant or necessary for the purposes which we collected it.
- 4.4. We will not share, sell, rent or otherwise disclose your Personal Information outside of VENTORA except as stated in this Privacy Policy or as required by law. We will only handle your Personal Information as stated in this Privacy Policy.
- 4.5. There may also be circumstances where we are required by law, or by order of a court of government authority, to use your Personal Information in a particular way (which may include for anti-money laundering purposes, financial reporting obligations, child protection, work health and safety laws, charitable collections, medical treatment or other legislation). These obligations may require us to report our compliance to third parties. We will only handle your Personal Information in this context as required by law or at the request of a relevant government authority.

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## 5. DISCLOSURE OF YOUR PERSONAL INFORMATION

- 5.1. VENTORA may disclose your Personal Information to third parties or its Affiliates in certain circumstances. VENTORA will only supply Personal Information to a third party in accordance with law and this Privacy Policy. These may include:
- (a) where we have your consent for the disclosure;
  - (b) where this is necessary in order to provide you with products or services or for quality assurance purposes, such as to our Affiliates, employees, officers, suppliers, service providers or contractors;

- (c) to our Affiliates, for internal administration purposes;
  - (d) to our insurers or professional advisers (including our accountants, auditors and lawyers);
  - (e) to credit providers and credit reporting agencies (for credit-related purposes such as credit history, verification or reporting obligations); or
  - (f) to our marketing partners (for more information about marketing, see section 6 of this Privacy Policy).
- 5.2. We may, from time to time, be required to disclose Personal Information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement or government agency request.
- 5.3. VENTORA may also disclose your Personal Information to protect the copyright, trademarks, legal rights, property or safety of VENTORA, its customers or third parties.
- 5.4. If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any Personal Information and non-Personal Information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.
- 5.5. If we need to disclose your Personal Information for any other purpose (other than where this is required by law), we will obtain your consent for that disclosure.

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## 6. DIRECT MARKETING

- 6.1. VENTORA, or any of its Affiliates or authorised service providers, may from time to time send you marketing communications about products or services, inviting you to participate in our events or surveys, or otherwise communicate with you for marketing purposes.
- 6.2. When you visit our websites, VENTORA (and our service providers) may also use your Personal Information collected from you and the device you use to access our websites, in order to target advertisements for our goods or services to you on our websites and other sites you may visit (e.g. using cookies to identify your device and direct ads for our Services to you). You can control the cookies used to advertise to you (please see section 11.3 of this Privacy Policy for more information).
- 6.3. If you do not wish to receive any marketing communications from VENTORA, or do not consent to our use of your Personal Information in this way, you can opt-out, withdraw and/or amend your consent at any time, by:
- (a) following the instructions on how to opt-out included within the material that is sent to you (such as the 'opt-out' or 'unsubscribe' link provided in an email correspondence); or

- (b) contacting us and requesting we stop using your Personal Information in this way.
- 6.4. We will comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from VENTORA, we will still send you important administrative messages that we are required to provide you with our products and services and in accordance with law.

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## 7. SECURITY OF YOUR PERSONAL INFORMATION

- 7.1. VENTORA stores information in different ways, including in paper and electronic form.
- 7.2. Security of Personal Information is important to VENTORA. We have taken reasonable steps to protect the information we hold from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures we have implemented to maintain the security and integrity of the Personal Information we hold include (but are not limited to) the use of computer access passwords, lock-up cabinets and firewalls on our systems, and security measures for our website.
- 7.3. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your information or data transmitted to our websites or using electronic means; any such transmission is at your own risk. Once we have received your information, we will implement the abovementioned strict procedures and security features to try to prevent unauthorised access.
- 7.4. If you have registered an account with us, then you must take reasonable measures to ensure the security of your password and any email address you use to register your account. If you have any reason to believe that your interactions or communications with us are no longer secure (for example, if you feel that the security of your account with us, or any email address you use to communicate with us, has been compromised), please contact us immediately.

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## 8. OVERSEAS DISCLOSURES

- 8.1. In some circumstances Personal Information we collect may, from time to time, be stored, processed in or disclosed outside of Australia, for example, information disclosed to VENTORA parent companies in the USA, European Union or Asia. Those countries may have data and information protection rules that are different from those in Australia.
- 8.2. We will at all times take reasonable steps to ensure that any overseas recipients of Personal Information do not hold, use or disclose your Personal Information in a way that is inconsistent with the obligations imposed under the Privacy Act and the Australian Privacy Principles in the Privacy Act.

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## 9. ANONYMITY AND PSEUDONYMITY

- 9.1. Information is anonymous if it is not associated with or linked to Personal Information, and cannot be used to identify an individual.
- 9.2. We may create anonymous data records from Personal Information we collect or hold in relation to you, by anonymising your Personal Information (e.g. removing your contact details) from those data records. We may use this anonymous data to analyse usage patterns or for other aggregate data analysis so that we may enhance the content of our website, products or services. We reserve the right to use anonymous data for any purpose and disclose anonymous data to third parties in our sole discretion.
- 9.3. You may request to engage with us using a pseudonym or whilst remaining completely anonymous, including when you make inquiries or send complaints / feedback. We may be limited in our ability to engage with you if you request to use a pseudonym or remain anonymous.
- 9.4. However, in many instances we will need your Personal Information in order to provide our products and services to you, and it may not be possible for us to provide you with our products or services, or interact with you in particular ways, if you are engaging with us anonymously or using a pseudonym.

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## 10. ACCESS TO YOUR PERSONAL INFORMATION

- 10.1. We will take all reasonable steps to ensure that the Personal Information we collect, use or disclose is accurate, complete and up-to-date. However, we rely on the accuracy of Personal Information as provided to us both directly and indirectly.
- 10.2. You may request details of Personal Information that we hold about you in accordance with the provisions of the Privacy Act . If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please submit an enquiry through our website(s) using our webform and we will take reasonable steps to ensure that it is corrected.
- 10.3. In order to facilitate any such request, you may be asked to provide evidence of your authority to interact with certain Personal Information, including your identity. We may also ask that you be reasonably specific in your request, or otherwise answer any of our queries to assist us to better understand your request.
- 10.4. We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act. This may include if we have reason to believe you are not authorised to receive information, or if we are unable to verify your identity.

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## 11. WEBSITE

- 11.1. When you visit our websites, our systems may collect certain information such as your use of the site, including the web pages visited and the time and date of your visit. We use this information to help analyse and improve the performance of our website.
- 11.2. Our websites include analytical features. These features may collect your IP address, geographical location, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Analytical features are either hosted by a third party or hosted directly on our websites. Your interactions with these features are governed by the privacy policy of the company providing it.
- 11.3. Cookies
  - (a) VENTORA may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Most web browsers automatically accept cookies but you can choose to disable cookies by changing your internet browser settings. However, you may lose the benefit of the enhanced website experience that the use of cookies may offer.
  - (b) VENTORA and our marketing analytics service providers also use other technologies such as beacons, tags and scripts. These technologies are used in analysing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.
- 11.4. Third party sites
  - (a) VENTORA partners with third parties to either display advertising on our website or to manage our advertising on other sites. These websites are not owned or controlled by VENTORA and are meant for your convenience only.
  - (b) Links to third party websites do not constitute VENTORA's sponsorship, endorsement or approval of these websites.
  - (c) Our third party partners may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests.
  - (d) Please be aware that VENTORA is not responsible for the privacy practises of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.
- 11.5. We will treat Personal Information collected via our websites and online systems in the same way as other Personal Information we collect under this Privacy Policy. However, third party websites linked to our websites are not subject to our privacy standards, policies or procedures. VENTORA cannot take responsibility for the collection, use, disclosure or security of any personal information that you provide to a third party website.

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## 12. COMPLAINTS ABOUT PRIVACY

- 12.1. If at any time you have a complaint or issue with this Privacy Policy, or the manner in which VENTORA has handled your Personal Information, you can contact us using our details below. VENTORA will endeavour to treat all complaints and privacy inquiries received seriously, promptly, and confidentially (to the extent permissible at law).
- 12.2. Any complaints about our privacy practices may be made to the VENTORA Privacy Officer at this address:  
VENTORA Australia Pty Ltd  
c/o The Privacy Officer  
Level 3, 78 Waterloo Road  
MACQUARIE PARK, New South Wales, 2113  
  
Or submit an enquiry through our website(s).
- 12.3. We will respond to your complaint within a reasonable period, usually within 30 days, and try to resolve your complaint for you.
- 12.4. In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)).

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## 13. CHANGES TO PRIVACY POLICY

VENTORA reserves the right to modify this Privacy Policy at any time. When amendments occur an updated Privacy Policy will be posted on our websites and the updated Privacy Policy will be effective immediately upon our posting on our websites. We urge you to check back from time to time when you visit to obtain and review the most current Privacy Policy.