

## PRIVACY, SECURITY & CREDIT REPORTING POLICY

This privacy, security and credit reporting policy applies to your use of our website ([www.rapidglobal.com](http://www.rapidglobal.com)) and to the purchase of any goods and services, or other communications or dealings you may have with us.

The terms and conditions that apply to the sale of any products via our website, or otherwise can be found [here](#) (**Trading Terms**). The terms that apply to the use of our website can be found [here](#) (**Website Terms**).

### 1. INTRODUCTION

- 1.1 Rapid Global Nominee Pty Ltd ACN 161 913 882 as agent for Rapid Global Nominee Pty Ltd as trustee for the Rapid Global Unit Trust and TAPAI Pty Ltd ACN 131 827 426 as trustee for the TAPAI Family Trust trading as Rapid Global ABN 54 229 322 834 (we, us or our) is covered by the 13 Australian Privacy Principles (**APPs**). The APPs apply to the collection and use of Personal Information as set out in the *Privacy Act 1988* (Cth (**Act**)) (as amended from time to time). For the purpose of this Policy:
  - 1.1.1 **Personal Information** means information, including financial 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 in a material form or not.
  - 1.1.2 **Sensitive Information** means information or an opinion (that is also Personal Information) about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual practices, criminal record or health information.
- 1.2 We recognise the importance of protecting your Personal Information. We will take reasonable steps to ensure all Personal Information held by us is secure and all Personal Information collected, used or disclosed by us is accurate, complete and up to date. Our handling of Personal Information is regulated by the Act and the Credit Reporting Privacy Code (as amended from time to time)(**Code**).
- 1.3 This Policy is published on our website and may be updated from time to time at our discretion. By continuing to use our website, or otherwise continuing to deal with us, you accept this Policy as it applies from time to time.

### 2. TYPES OF PERSONAL INFORMATION

- 2.1 Depending on the particular circumstances, we may collect and hold a range of different Personal Information about you.
- 2.2 This may include, but is not limited to:
  - 2.2.1 your name;
  - 2.2.2 date of birth;
  - 2.2.3 contact details (including address, email address and telephone number);
  - 2.2.4 driver's licence number;
  - 2.2.5 credit history;
  - 2.2.6 information about your computer or device and about your visits to and use of our website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation);
  - 2.2.7 other details requested by us to provide the services you have requested; and
  - 2.2.8 payment, transaction and financial information.
- 2.3 We use Google Analytics to analyse the use of our website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.
- 2.4 We may hold credit card details and bank account numbers if provided to us directly.

- 2.5 However, credit card details are not processed through or retained on our servers if goods or services are purchased via our website (in which case credit card information is processed via the eWay, St George Bank or National Australia Bank credit card processing system).

### **3. SOURCES OF PERSONAL INFORMATION**

- 3.1 Where possible, we will collect Personal Information directly from you. In some instances, we may collect Personal Information from other sources such as third parties, publically available sources, press reports or other publications, in which case, we will endeavour to verify such details with the person concerned.
- 3.2 We acknowledge that there is no obligation for you to provide us with Personal Information except as required by law. However, if you choose not to provide us with certain necessary details, we may not be able to provide you with our full range of services or employment.
- 3.3 We collect Personal Information in a number of ways, including but not limited to:
- 3.3.1 directly from you when you order or purchase goods or services from us, set up an account with us;
  - 3.3.2 when you browse our website;
  - 3.3.3 if you apply for employment with us, from any third parties that you nominate as your referees (and you consent to use obtaining Personal Information about you from third party sources such as social sites).

### **4. PURPOSE FOR USE AND DISCLOSURE**

- 4.1 The purpose for which we use and disclose Personal Information will depend on the circumstances in which it is collected. Generally, we may use or disclose Personal Information:
- 4.1.1 for the purposes for which it was collected;
  - 4.1.2 for a related secondary purpose, if the use or disclosure could be reasonably expected;
  - 4.1.3 for other purposes to which you have consented; and
  - 4.1.4 as otherwise authorised or required by law (for example, to comply with occupational health and safety, industrial relations and taxation laws).
- 4.2 Specific purposes for which we may use or disclose Personal Information include the purposes of:
- 4.2.1 providing you with products and/or services;
  - 4.2.2 dealing with customer care related activities;
  - 4.2.3 marketing and developing our products and services;
  - 4.2.4 the operation and administration of accounts;
  - 4.2.5 carrying out certain checks (for example, in relation to credit);
  - 4.2.6 considering an individual for employment;
  - 4.2.7 interacting with companies or organisations with whom we have a business relationship;
  - 4.2.8 complying with our obligations under agreements with third parties; and
  - 4.2.9 carrying out any activity in connection with a legal, governmental or regulatory requirement that we have to comply with, or in connection with legal proceedings, crime or fraud prevention, detection or prosecution.
- 4.3 In the event we collect Sensitive Information about you, you consent to us collecting, using and disclosing the Sensitive Information for the purpose for which it was disclosed and as permitted by the Act and other relevant laws.
- 4.4 It is not likely that we will disclose Personal Information that we collect and hold about you to any overseas recipients (as defined in the Act).

## 5. ANONYMITY AND PSEUDONYMITY

- 5.1 You can deal with us anonymously (without identifying yourself) or under a pseudonym (fictitious name) unless you are applying for credit from us, applying for employment with us, dealing with us in relation to the provision of goods or services or in any other situation where it is impractical or unlawful to deal with you anonymously or under a pseudonym.

## 6. SECURITY

- 6.1 We will take reasonable steps to keep your Personal Information confidential and to protect the Personal Information we hold from misuse and loss or unauthorised access, modification and disclosure.
- 6.2 All Personal Information collected by us will be retained as part of our business records, which will be securely monitored and maintained. We hold Personal Information in a number of ways, including:
- 6.2.1 on secure servers in our secure facilities;
  - 6.2.2 on our web server computer, which is protected by firewalls;
  - 6.2.3 as part of customer records and other electronic documents on which Personal Information is contained which are stored on our information technology systems and servers operated by third parties who provide services to us in connection with our business; and
  - 6.2.4 by securely storing hard copy documents on which Personal Information is contained, at our various premises and using third party document management and archiving services.
- 6.3 While we take reasonable technical and organisational precautions to ensure the security of your data on our systems (and without limiting anything set out in our Trading Terms or Website Terms):
- 6.3.1 data transmission over the internet is inherently insecure and we cannot guarantee the security of data sent over the internet; and
  - 6.3.2 without limiting the above, we do not take responsibility for any unauthorised access to your Personal Information or loss of or corruption of data caused by any computer virus or Trojan horse or via any system from an internet service provider linking your computer system to ours.

## 7. RETENTION OF PERSONAL INFORMATION

- 7.1 If we receive Personal Information where we have not taken any steps to collect such information, then within a reasonable time we will decide whether we could, under the APPs, have solicited that Personal Information ourselves. If we determine that we would not, under the APPs, have been permitted to solicit the Personal Information, we will as soon as practical (where lawful and reasonable to do so) destroy or de-identify that unsolicited Personal Information. If we could, under the APPs, have solicited the Personal Information then we may use and disclose the Personal Information for the purpose for which it was disclosed and as permitted by the Act and other relevant laws.
- 7.2 Where Personal Information held by us is no longer required to be held, and its retention is not required by law, when we will destroy such Personal Information by a secure means.

## 8. CREDIT REPORTING

- 8.1 If you apply for credit from us, we will need to collect Personal Information from you so we can assess your Credit Application. In order to assess your Credit Application, you consent to your Personal Information being disclosed to, and us obtaining your Personal Information from, third parties. Such third parties may include credit reporting bodies (**CRB**), companies who provide commercial credit references, people you authorise us to contact in connection with your Credit Application or any approved Business Credit Account, mercantile agencies and other companies who provide outsourced services to us. For contact details and information on how a CRB manages credit related Personal Information, please see their privacy policies available at the websites set out above.
- 8.2 CRBs may include your Personal Information in reports that they provide to credit providers to assist those providers in assessing your credit worthiness. If you fail to meet your payment obligations in relation to consumer credit or commit a serious credit infringement, we may be entitled to disclose this to a CRB.

- 8.3 CRBs offer a service to credit providers wanting to send direct marketing material about credit services to individuals (**credit pre-screening**). You have the right to request that CRBs do not use your Personal Information for credit pre-screening. To opt-out of credit pre-screening, contact the CRB, using the contact details on their websites set out above. You can also ask a CRB not to use or disclose your Personal Information for a period if you believe on reasonable grounds that you have been or are likely to be a victim of fraud.

## 9. THIRD PARTY LINKS

- 9.1 Our website may from time to time contain links to other websites. Without limiting anything set out in the Website Terms, these websites may have a different privacy policy to ours and it is important that you check the policy of each website you visit. Once you leave our website, we have no control or responsibility over the privacy policies or data collection activities at another website.

## 10. ACCESS TO PERSONAL INFORMATION

- 10.1 You can gain access to your Personal Information, subject to certain exceptions contained in the Act. To request access to your Personal Information, or to update or correct that Personal Information, please send a written request to either Rapid Global, Level 2, 118 Franklin Street, Adelaide SA 5000 or to email address [support@rapidglobal.com](mailto:support@rapidglobal.com) (**Contact Address**). We will check the identity of individuals making requests to determine within 14 days whether the request will be met.

## 11. DIRECT MARKETING

- 11.1 We may send you marketing communications in line with your previously expressed marketing preferences or as otherwise permitted under the Act and other relevant laws. If you do not wish to receive such communications, please contact us via the Contact Address or follow the opt-out instructions contained in each marketing communication.

## 12. COMPLIANCE

- 12.1 If you are concerned that the way in which we collect, hold, use or disclose your Personal Information may be in breach of the APPs or the Code, please send written details of your complaint to the Contact Address.
- 12.2 After receiving a complaint, we will conduct internal discussions and evaluate whether we believe that such collection, holding, use or disclosure of your Personal Information was in breach of the APPs and/or the Code. We will endeavour to notify you of the results of our investigation of your complaint within 30 days of receiving your complaint. However, if your complaint involves complex issues or requires extensive investigation, it may not be possible to respond within this timeframe. If the conclusion of our investigation is that our collection, holding, use or disclosure of your Personal Information was in breach of the APPs and/or the Code, we will take steps to remedy the breach as soon as reasonably practicable. If after dealing with us you are still not satisfied, you are entitled to make a complaint to the Office of the Australian Information Commissioner or the Financial Ombudsman Service.