

## Privacy Policy

This privacy policy sets out how Johns Lyng Group Pty Ltd and its subsidiaries and related entities (collectively “we”) treat the privacy of customers and others with whom we interact. For the purpose of this policy the businesses covered by this policy are those trading under the names Johns Lyng Commercial Builders, Johns Lyng Insurance Builders, Johns Lyng Express Builders, Johns Lyng MAKESAFE Builders, Johns Lyng Regional Builders, Sankey Glass, Restorx, Easy2Call, Shopfit, Global Home Response and Your Caretaker.

In this privacy policy, the term “personal information” has the meaning in the *Privacy Act 1988* (Cth) and under that legislation includes information and or opinion about an identifiable individual, including name, address, telephone and fax numbers, email address, date of birth, gender, marital status, driver’s licence details, credit information and history, banking details, income and other financial details, information about use of our product or services, insurance history, employment details and history, information about properties individuals currently own or rent, and if and where applicable, includes information that constitutes “sensitive information” as defined in the *Privacy Act* such as criminal record and health information.

### 1. Collection and Storage of Personal Information and Data

We may collect personal information (such as the above types of information) about individuals. Our approach is to collect personal information directly from the individual concerned unless it is impracticable or unreasonable to do so or in circumstances where you would reasonably expect us to do otherwise, including as outlined further in this document.

For example, we collect personal information in circumstances including:

- (i) during communications between individuals and our staff (including in person and over the telephone), through text messages you send us, through written forms through which you provide information and via the internet, including websites (including social media sites such as LinkedIn);
- (ii) when you telephone us or visit our website and make an enquiry to which a later response is requested and to do so requires your contact details;
- (iii) in communications with landlords, tenants, leasing agents, council officials;
- (iii) when you enter into a contract with us for goods or services ;
- (iv) when you pay for our goods or services with methods other than cash;
- (iii) when we conduct credit checks through credit reporting bodies, various public domain databases;
- (v) when we make enquiries through ASIC, Centrelink or Titles Office;
- (vi) when liaising with insurers, for the purposes of considering, processing and administering claims;
- (vii) when you ask to be included on a marketing distribution list; and
- (viii) when evaluating job applicants and personnel, including their contact details, employment history and educational qualifications. This may include “sensitive information” as defined in the Privacy Act. Further details about our privacy policy and practices for job applicants will be available at the time of application.

We may use ‘cookies’ to collect data (typically not personal information) relating to your general internet usage. This data may include IP-addresses, browser versions, number of visits and similar such data relating to your navigation of the internet and our site. A cookie is a small text file that is placed on your computer’s hard drive. Cookies help us to improve our site and to deliver a better and more tailored service, for instance by storing information about your preferences and allowing us to recognise you when you return to our site.

You may refuse to accept cookies by activating settings on your internet browser. However, please note that if you select such settings you may be unable to access certain parts of our site.

We collect personal information directly from you, from publicly available sources of information (such as ASIC searches) and from other persons or organisations, such as insurers.

We hold personal information in our own secure databases and in secure hard copy files on our premises.

If you do not provide us with the personal information we request or require, we may not be able to provide our services to you or may not be able to do so to the same standards.

## **2. Use of Personal Information**

We may use personal information for the purpose of marketing but only where such use complies with the Privacy Law and the Australian Privacy Principles in particular.

We use the personal information collected from you for the purpose it was provided or collected, including in the following ways:

- (a) For the purposes referred to in section (1) above;
- (b) To identify you and conduct appropriate verification checks and other enquiries;
- (c) To help determine the best and most appropriate goods and services for you;
- (d) To administer our products and services, including when dealing with insurers;
- (e) To otherwise respond to enquiries received from you;
- (f) To process, confirm, fulfil and update you about your enquiries and to carry out our obligations arising from any contracts entered into between you and us;
- (g) To perform authorised financial transactions with you;
- (h) To discuss claim handling and history with insurers;
- (i) To communicate with you and provide you with information (whether by email, post or other means) about our products or services, where you have requested or consented to receiving this from us or where this provision is otherwise permitted under the Australian Privacy Principles;
- (j) To notify you about changes to our goods and services;
- (k) To receive and address feedback or complaints from you; and
- (l) To protect our legal interests and fulfil our regulatory obligations (if and to the extent necessary).

All our customers and others with whom we interact have the option to opt-out of receiving marketing communications from us. If you do not wish to continue to receive electronic marketing communications from us and/or selected third parties you should opt-out by clicking on the "unsubscribe" link in any email communications that we might send you.

## **3. Disclosure of Personal Information**

We disclose personal information for the purposes for which it has been collected, as set out above. We may disclose your personal information to any of our related group companies. They will only use it for the same purposes that we may under this policy. We may provide personal information to insurers, and also to other third parties for limited purposes, such as to help us in providing goods and services to customers.

Those persons and business may include:

- (a) Organisations who carry out credit, fraud and other security checks;
- (b) Subcontractors carrying out works;
- (c) Couriers and delivery business (where we arrange to deliver goods to you or persons you have requested us to send deliveries to); and
- (d) Third party software providers who store details of customer account for us or who provide other IT services.

We may also disclose your personal information to third parties outside our group of companies:

- (a) Where we have your express permission to do so;
- (b) Where it can reasonably be inferred from the circumstances that you consent to the disclosure to the third parties;
- (c) If a Johns Lyng company or substantially all of its respective assets are acquired by a third party, in which case personal information which we hold about our customers may be one of the transferred assets (subject to the same constraints on use and disclosure as under this policy); and
- (d) If we are under a duty or authorised to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions; or to protect the rights, property, or safety of our staff or customers . This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We deal with third parties that are required to meet the privacy standards required by law in handling your personal information, and use your personal information only for the purposes that we gave it to them.

#### **4. Overseas disclosure**

We may disclose some personal information overseas for limited purposes, to the extent necessary to perform our functions or activities. The recipients of this information are located in the Philippines and or the USA. We do so under an agreement with them obliging them to comply with privacy obligations and/or on the basis that the laws in their territories provide similar protection for personal information. We also disclose some information overseas when you have asked us to do so or we have your consent

#### **5. Security of personal information**

We take reasonable steps to protect your personal information, including internal and external security, restricting access to personal information to those who have a need to know, maintain technological products to prevent unauthorised computer access and regularly reviewing our technology to maintain security.

#### **6. Questions and concerns and access to/ correction or updating of your personal information**

You have a right to access the personal information we hold about you, with some exceptions, to find out the information held and/or to correct it. To obtain a copy of the personal information we hold about you, please write to us at:

The Privacy Officer  
Simon Plummer  
Johns Lyng Group  
1 Williamsons Road, Doncaster VICTORIA 3108

Or by e-mail:

[splummer@johnslyng.com.au](mailto:splummer@johnslyng.com.au)

Please provide sufficient detail about the information in question to help us locate it. We will then use commercially reasonable efforts to promptly determine if there is a problem and take the necessary corrective action within a reasonable time.

We may not be able to provide you with access to information in some situations including where doing so may create a serious threat to life or the health of any individual, where it may constitute an unreasonable intrusion into the privacy of another, where your request is in our opinion frivolous or vexatious or where otherwise permitted at law.

#### **7 Changes to our privacy policy**

We may modify, alter or otherwise update this privacy policy at any time. We will post revisions on our website. We encourage you to review this policy from time to time.

**Last update: January 2015**