

# PASPALLEY

## Paspaley Privacy Policy – non-retail

20 December 2019

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### 1 Introduction

Pearl Corporation of Australia Pty Limited and its related bodies corporate (**Paspaley**) understand that your privacy is paramount. We take the privacy of our customers very seriously and are committed to protecting your privacy. This policy sets out how we handle information about you.

Please note that separate privacy policies (and not this policy) apply to our retail businesses. Please let us know if you require a copy of those policies (see section 9 for our contact details).

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### 2 Collection of personal information

We may collect personal information from you when you do business with us, including when you:

- supply or purchase products from us; or
- interact with our staff,

or otherwise as notified to you from time to time, including through a collection statement.

The personal information you provide to us may vary depending on the nature of your interaction with us, but may for example include your contact details and any communications you send to us.

There may be occasions when we collect information about you from a third party. In such instances, we will determine whether we would have been entitled to collect such information from you and to the extent we would not have been entitled to do so, we will destroy or de-identify such information as soon as reasonably practical.

We generally do not permit people that we do business with to deal with us anonymously or using a pseudonym. If you do not provide us with your personal information, we may not be able to conduct business with you.

Unless you notify us otherwise, we will assume that you have consented to the collection of all information which is provided to us for use in accordance with this Privacy Policy.

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### 3 Our websites

Our web servers may automatically collect information when you visit our websites, including:

- your IP address;
- the date and time of your visit;
- the parts of our website you access during your visit;

- your actions on our website; and
- the browser you are using.

In using our websites, your personal information may be collected through the use of cookies. These are small text files placed on your mobile device or computer by our websites which automatically collect information about you without you providing that information to us directly. Most browsers are set by default to accept cookies. However, if you do not wish to receive any cookies you may set your browser to either prompt you whether you wish to accept cookies on a particular site, or by default reject cookies.

Please note that rejecting cookies may mean that some or all of the functions on our website will not be available to you.

Sometimes our websites contains links to other websites. When you access a website other than our websites, we are not responsible for the privacy practices of that site. We recommend that you review the privacy policies of each website you visit.

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## 4 Using your personal information

Paspaley only uses personal information for the purpose for which it was collected, for related purposes which we consider come within your personal expectations, or as permitted or required by law.

In particular, the personal information that we collect is generally used in the conduct of our business, or as notified to you at the time the information is collected.

We may contact you from time to time for marketing or promotional purposes, including to provide you with information in relation to the goods or services of our related entities and third parties where we believe they meet the high standards associated with our products. If you would rather not receive any marketing or promotional material from us, you may opt out by notifying us using the contact details in section 9 below, or following the unsubscribe instructions on any marketing email you have received.

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## 5 Sharing your personal information

We may disclose your personal information to other related entities within our corporate group for our own business purposes. Some of our related entities are located overseas, including in Hong Kong, Japan and the United States of America.

We may disclose information to third party contractors, who help us conduct our business. Where information is shared with these third parties, we will take all reasonable steps to ensure that third parties observe the confidential nature of such information and are prohibited from using any or all of this information beyond what is necessary to assist us.

While we may market the goods or services of third parties in limited circumstances as described above, we will always do so ourselves (or using our own third party contractors). We do not sell, rent or trade personal information to third parties for marketing purposes.

We may also disclose your personal information as permitted or required by law.

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## 6 Accessing your personal information

You may contact us to request access to the information we hold about you, including for the purpose of correcting or updating that information. If you require access to your personal information, please contact our Privacy Manager as described in section 9 below.

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## 7 Protecting your personal information

Paspaley is committed to protecting your personal information. We take appropriate security measures to protect your personal information from misuse, interference or loss, and from unauthorised access, modification or disclosure. This includes the use of technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect the privacy of your personal information.

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## 8 Change of policy

We may modify or amend this Privacy Policy from time to time. We will display a notice on our Paspaley group website ([www.paspaleygroup.com](http://www.paspaleygroup.com)) for a reasonable period after any such revisions have been made. We will keep the current version of this Privacy Policy on that website.

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## 9 Contact information

If you have any queries or complaints with regards to our collection, use or management of your personal information, please contact our Privacy Manager:

A: Privacy Manager  
Charles Darwin Centre  
Level 20  
19 The Mall  
Darwin NT 0800

E: [privacy@paspaley.com.au](mailto:privacy@paspaley.com.au)

T: (08) 8982 5555

If you make a complaint, we will endeavour to respond to it as soon as possible. If you are dissatisfied with our response, you have the right to make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).