

PRIVACY POLICY

PRIVACY STATEMENT

Site Pro 1 Australia is a division of Industrial Galvanizers Corporation Pty Ltd ACN 000 545 415 (“Site Pro 1”) and is committed to protecting your privacy and personal information when you deal with us.

Site Pro 1’s privacy policies support and comply with the Commonwealth legislation that deals with how businesses may collect, hold and use personal information about individuals. That legislation is the *Privacy Act 1988* (the “Act”) and the Australian Privacy Principles introduced by that Act. Site Pro 1, as required by the Act (particularly Part IIIA) and the associated Australian Privacy Principles, has two privacy policies. The first is Site Pro 1’s Australian Privacy Principles Privacy Policy (“APP Privacy Policy”), which is Site Pro 1’s general privacy policy in respect of Site Pro 1’s general day-to-day involvement with the public and Site Pro 1’s customers, and which is not related to Site Pro 1’s activities as a credit provider to commercial customers. Site Pro 1 also has a Credit Reporting Privacy Policy. Insofar as Site Pro 1 is a credit provider, it is also required to have a Credit Reporting Privacy Policy under Part IIIA of the *Privacy Act 1988*.

Both the APP Privacy Policy and Credit Reporting Privacy Policy can be viewed by clicking on the links at the bottom of this statement.

Site Pro 1:

- Will only collect personal information from you with your prior knowledge and consent. You can access its website and browse the site without disclosing personal information;
- Will only use personal information provided by you for the purposes for which it was collected and Site Pro 1 will not disclose your personal information to a third party, except when it is required to facilitate a service you have requested or as required by law;
- Has implemented security technology, rules, measures and policies to protect the personal information under our control against unauthorised access, improper use, alteration, unlawful or accidental destruction and accidental loss;
- Will remove personal information from its systems where it is no longer required (except where archiving is required).

If you wish to view the personal information that you have provided and/or which Site Pro 1 holds about you, or you wish to comment on or obtain further information about our privacy policies, please contact our privacy officer:

Privacy Officer
 Site Pro 1
 7 Activity Street
 Acacia Ridge QLD 4110

Telephone: 1300 748 377
 Email: sales@sitepro1.com.au

SECTIONS:

1. [APP PRIVACY POLICY](#)
2. [CREDIT REPORTING PRIVACY POLICY](#)
3. [COMPLAINTS HANDLING POLICY](#)

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APP PRIVACY POLICY

Introduction

1. This APP Privacy Policy of Site Pro 1 Australia, a division of Industrial Galvanizers Corporation Pty Ltd ACN 000 545 415 (“Site Pro 1”), is Site Pro 1’s official privacy policy as required by the *Privacy Act 1988* (the “Act”) and the Australian Privacy Principles (the “APPs”) and it applies to all personal information about individuals collected by Site Pro 1.

This policy explains how and why personal information about individuals is collected, how it is used, and what controls individuals have over its use.

2. Site Pro 1 is committed to complying with Commonwealth legislation (the Act and the APPs) that deals with how businesses may collect, hold and use personal information about individuals and to protecting and safeguarding the privacy of individuals it deals with.

Collection of Information

1. Some information provided to Site Pro 1 by clients, customers and other parties might be considered private or personal. However, without such information Site Pro 1 would not be able to carry on its business activities and provide services. It will only collect such personal information if it is necessary for one of its functions or activities. The kinds of personal information that Site Pro 1 may collect and hold in respect of individuals includes:
 - Names;
 - Contact details and identification information;
 - Financial information, including information about transactions and trading history with Site Pro 1;
 - Information about credit history.
2. In particular, personal information is collected in the following situations by Site Pro 1:
 - If an individual contacts Site Pro 1, a record of that communication or correspondence may be kept;
 - If an individual submits an application or curriculum vitae or another form required to be completed by an individual to enable and/or facilitate services and or/employment to be provided by Site Pro 1;
 - When applying for and/or establishing and/or accessing an account with us or ordering products or services from us;
 - When conducting certain types of transactions such as cheque or credit card purchases or refunds;
 - When an individual submits their contact details to be included on Site Pro 1’s mailing lists;
 - When an order is placed to purchase goods or services, individuals may be required to provide contact information including name, address, telephone number and/or email address and financial information (such as credit card details) for the purposes of processing and fulfilling such an order;
 - Site Pro 1’s overseeing of various research projects;
 - Where CCTV footage is recorded at Site Pro 1 premises.

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3. At or before the time the personal information about an individual is collected, Site Pro 1 will take reasonable steps to ensure that the individual is made aware of the company, the fact that the individual is able to gain access to the information held about the individual, the purpose of the collection, the type(s) of organisations to which the information collected about the individual may be disclosed, any laws requiring the collection of the information and the main consequences if all or part of the information is not collected.
4. Personal information about individuals is usually collected directly from the individual. However, sometimes personal information about individuals may be collected from third parties for the purposes described below in this policy. The circumstances in which this occurs includes, for example, where information from a third party is needed to assist in processing an application or an order (such as to verify information an individual has provided or to assess the individual's circumstances) or to assist in locating or communicating with the individual.

Use of Information Collected and Disclosure of Personal Information to Others

1. Personal information held about an individual may be used or disclosed as permitted by law for the business purposes for which it is collected (e.g. provision of services, including administration of services, notifications about changes to services, record keeping following termination of services and technical maintenance) – that is, to carry on Site Pro 1's business activities and provide services to its customers. Such information about individuals may also be used for a purpose related to the primary purpose of collection and where the individual would reasonably expect that the information be used in such a way. This information is only disclosed to persons outside the business in the circumstances set out in this policy or as otherwise notified at the time of collection of the information.
2. Site Pro 1's business purposes for which personal information is collected, used and disclosed may include:
 - Processing an application for employment form (including verifying a person's identity and employment history);
 - Processing an application or product order or service request (including verifying a person's identity for these purposes);
 - Managing our products and services or other relationships and arrangements, including processing receipts, payments and invoices;
 - Assessing and monitoring credit worthiness;
 - Detecting and preventing fraud and other risks to Site Pro 1 and its customers;
 - Responding to enquiries about applications, accounts or other products, services or arrangements;
 - Understanding our customers' needs and developing and offering products and services to meet those needs;
 - Researching and developing our products and services and maintaining and developing our systems and infrastructure (including undertaking testing);
 - Ensuring workplace health and safety and productivity of individuals and employees at Site Pro 1's premises;
 - Dealing with complaints;
 - Meeting legal and regulatory requirements. Various Australian laws may expressly require Site Pro 1 to collect/and or disclose personal information about individuals, or do so in order to be able to comply with other obligations under those laws;
 - Enforcing its rights, including undertaking debt collection activities and legal proceedings.

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3. In addition, Site Pro 1 is permitted to use or disclose personal information held about individuals:
 - Where the individual has consented to the use or disclosure and is related to the primary purpose for which the information was collected;
 - Where it is reasonably believed that the use or disclosure is necessary to lessen or prevent a serious, immediate threat to someone's health or safety or the public's health or safety;
 - Where it is reasonably suspected that unlawful activity has been, is being or may be engaged in and the use or disclosure is a necessary part of an investigation or in reporting the matter to the relevant authorities;
 - Where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process);
 - Where it is reasonably believed that the use or disclosure is necessary for prevention, investigation, prosecution and punishment of crimes or wrongdoings or the preparation for and conduct of proceedings before any court or tribunal or the implementation of the orders of a court or tribunal by or on behalf of an enforcement body.
 - Where a customer (being the individual or related to the individual) has requested a service be provided and it is required to disclose the information to a third party in order to facilitate the provision of the service. In most, if not all cases, any such disclosure will be with the consent of the individual.

4. Third parties to whom personal information about individuals may be disclosed in accordance with Site Pro 1's business purposes set out above may include:
 - Site Pro 1's legal advisors;
 - Site Pro 1's IT service providers;
 - Regulatory bodies in Australia;
 - Site Pro 1's financial advisors;
 - Participants in financial and payment systems, such as other banks, credit providers, and credit card associations;
 - Guarantors and security providers associated with individuals;
 - Debt collectors;
 - Cloud information storage providers;
 - Other credit providers and trade suppliers.

Anonymity and Pseudonymity

1. Individuals have the option of dealing with Site Pro 1 anonymously. However, this only applies where it is not impracticable for Site Pro 1 to deal with individuals acting anonymously or under a pseudonym. For example, individuals making general enquiries of Site Pro 1 may do so anonymously or under a pseudonym. However, if the dealing with Site Pro 1 is for Site Pro 1 to supply goods and services and/or to enter into contractual relations then it is impractical for individuals to deal with Site Pro 1 on an anonymous basis or under a pseudonym.

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Direct Marketing

- As part of Site Pro 1's functions and business activities and to promote the services provided to its customers, Site Pro 1 may use personal information that individuals have provided to Site Pro 1 for the purposes of direct marketing. Direct marketing includes, but is not limited to, sending to customers and other parties (including individuals) and/or contacting customers (including individuals) in relation to promotions, information about Site Pro 1. Recipients of direct marketing are always able to opt out of receiving direct marketing communications by sending an email to Site Pro 1's Privacy Officer at: sales@sitepro1.com.au. In any direct marketing communication recipients are reminded of their right to opt out of receiving direct marketing communications.

Links

- Site Pro 1's website may contain links to other websites and those third-party websites may collect personal information about individuals. It is not responsible for the privacy practices of other businesses or the content of websites that are linked to its website. Site Pro 1 encourages users to be aware when they leave the site and to read the privacy statements of each and every website that collects personally identifiable information.

Security and Storage

- Site Pro 1 places a great importance on the security of all information associated with its customers and clients and others who deal with the company. It has security measures in place to protect against the loss, misuse and alteration of personal information under its control. Site Pro 1 takes all reasonable steps to protect personal information that is under Site Pro 1's control from misuse, interference, loss and/or unauthorised access, modification or disclosure. All personal information held is kept securely and that which is held electronically is held on secure servers in controlled facilities.
- Personal information is de-identified or destroyed securely when no longer required.
- Site Pro 1 retains information it is provided including individuals' contact and financial and transactional information to verify transactions and customer details and to retain adequate records for legal and accounting purposes. Such information is held securely, including on secure servers in controlled facilities.
- Information stored within Site Pro 1's computer systems or by its agents who provide electronic storage facilities can only be accessed by those entrusted with authority and computer network password sanctions. Site Pro 1 has taken all reasonable steps to ensure the security of information stored with Site Pro 1's cloud-service provider.
- No data transmission over the internet can be guaranteed to be absolutely secure. As a result, while Site Pro 1 strives to protect users' personal information, it cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once Site Pro 1 receives a transmission, it makes every effort to ensure the security of such transmission on its systems.

Transfer of Information Overseas

- Site Pro 1 utilises local and overseas cloud services for the purpose of storing information. Customers' and clients' personal and/or sensitive information may be disclosed to a Site Pro 1 cloud-service provider for that purpose. While Site Pro 1's cloud-service providers are located in such places as Australia and Singapore, the country location of those providers may periodically change. Site Pro 1 may also from time to time be required to send your information overseas to other members of the Valmont Industries Inc. Group or related entities. More information may be obtained about any of those entities by contacting Site Pro 1.

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Access To and Correction of Personal Information

1. Site Pro 1 is committed to and takes all reasonable steps in respect of maintaining accurate, timely, relevant, complete and appropriate information about its customers, clients and website users.
2. Any individual may request access to personal information about them held by Site Pro 1. Such a request for access to personal information is to be made to Site Pro 1's Privacy Officer:

Privacy Officer
Site Pro 1
7 Activity Street
Acacia Ridge QLD 4110

Telephone: 1300 748 377
Email: sales@sitepro1.com.au

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CREDIT REPORTING PRIVACY POLICY

Introduction

1. This Credit Reporting Privacy Policy of Site Pro 1 Australia, a division of Industrial Galvanizers Corporation Pty Ltd ACN 000 545 415 (“**Site Pro 1**”), is Site Pro 1’s official credit reporting privacy policy as required by the *Privacy Act 1988* (the “Act”) and particularly Part IIIA of that Act and the Credit Reporting Code (the “CR Code”) and it applies to all credit information and credit eligibility information about individuals (“credit information”) collected, held and used by Site Pro 1 in its activities as a credit provider. In this policy it is explained how and why credit information about individuals is collected, how such information is used, and what controls individuals have over its collection and use of information about them. This policy is relevant to individuals who are current and former credit customers, as well as other individuals that Site Pro 1 deals with in connection with credit provided to its credit customers (for instance, such individuals may be guarantors or directors of corporate customers).
2. Site Pro 1 is committed to complying with Commonwealth legislation and regulations (the Act and the CR Code) governing privacy of credit information about individuals by credit providers and to protecting and safeguarding the privacy of individuals when they deal with the company.

Collection of Information and Types of Information Collected

1. Site Pro 1 collects, holds and uses various types of credit-related information about individuals, which includes:
 - Identification information such as current and prior names and addresses, age, contact details and driver’s licence number;
 - Applications for credit (including the name of each relevant credit provider), the type and amount of that credit and the fact that Site Pro 1 has accessed credit information to assess a relevant application;
 - That Site Pro 1 and other credit providers are or have been a provider of credit to an individual (or an entity associated with an individual) and the type, characteristics and maximum amount of credit that have been provided or will be provided;
 - The date that any credit contract Site Pro 1 or other credit providers have or had with an individual was entered into and the date that it comes to an end;
 - Payments owed to Site Pro 1 or another credit provider, in connection with credit provided to an individual (or an entity associated with an individual) or in relation to which an individual is a guarantor (and, if there is subsequently paid any such overdue payment, the fact of that payment);
 - Whether in Site Pro 1’s or another credit provider’s opinion an individual has committed a serious credit infringement;
 - Whether an individual has entered into arrangements with Site Pro 1 or other credit providers in connection with credit provided to the individual (or an entity associated with the individual);
 - Court proceedings information, personal insolvency information and credit-related publicly available information;
 - Scores, ratings, summaries, evaluations and other information relating to an individual’s credit worthiness, which is derived by Site Pro 1 or its agents or by Credit Reporting Bodies (“CRB’s”) wholly or partly on the basis of the information above;
 - Certain administrative information relating to credit, such as account and customer numbers.

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While the Act uses a variety of terms to refer to such information as referred to above, for ease of understanding and reading this policy, such information is referred to hereinafter as "credit information".

2. Credit information may be collected by Site Pro 1 in a number of ways including:

- Being provided by an individual directly to Site Pro 1 or by persons acting on behalf of the individual (such as on applications or other forms);
- Being provided by CRB's and/or other credit providers and/or trade suppliers with the consent of the individual;
- Being information that is in the public domain;
- Being information that is derived by Site Pro 1 from an individual's usage and (where applicable) trade on and transactional history on any account (of the individual or of an entity associated with the individual) held with Site Pro 1.

How Credit Information is Held

1. At or before the time any credit information is collected by Site Pro 1 about an individual, reasonable steps will be taken to ensure that the individual is made aware of who the company is, the fact that the individual is able to gain access to the information held about the individual, the purpose of the collection, the type(s) of entities to which such information collected about the individuals is usually disclosed, any laws requiring the collection of the information and the main consequences for the individual if all or part of the information is not collected.
2. Site Pro 1 may hold credit information about an individual in physical form or in electronic form on its systems or the systems of Site Pro 1's IT service providers. The credit information Site Pro 1 holds about individuals is protected by physical, electronic and procedural safeguards and Site Pro 1 also requires its service providers that hold and process such information on Site Pro 1's behalf to follow appropriate standards of security and confidentiality. Any credit information collected from an individual or about an individual is kept securely and held on secure servers in controlled facilities.
3. Site Pro 1 trains its staff and others who work for it on how to handle credit information appropriately and Site Pro 1 restricts access to what is necessary for specific job functions.

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Use of Information Collected and Disclosure of Personal Information to Others

1. Site Pro 1 may, as permitted by law, collect, hold, use or disclose credit information held about an individual for the purposes for which such information is collected. These purposes include:
 - To form decisions as to whether to provide an individual, or an entity associated with an individual, with credit or to accept an individual as a guarantor;
 - To make assessments relating to an individual’s credit worthiness which are used in Site Pro 1’s ongoing decision-making processes regarding provision of credit and the amount of such credit;
 - To participate in the exchange of credit information with other credit providers including obtaining from and providing information to CRB’s and/or other credit providers and/or trade suppliers as permitted by Part IIIA of the Act and the CR Code;
 - To assist an individual or entity associated with the individual to avoid defaulting on credit-related obligations to Site Pro 1 or other credit providers;
 - To undertake debt recovery and enforcement activities, including in relation to guarantors, and to deal with serious credit infringements;
 - To deal with complaints and meet legal and regulatory requirements; and
 - To assist other credit providers to do the same.

(Some credit information may only be used or disclosed under the Act for some of the above purposes or in some particular circumstances. Certain such particular circumstances are set out in clause nine (9) below.)

2. Generally, Site Pro 1 will be permitted to use or disclose credit information held about an individual where the individual has consented to its use or disclosure. Site Pro 1 may disclose credit information about an individual to a CRB and/or to other credit providers for such purposes as set out at clause eight (8) above as permitted by the Act. For example, Site Pro 1 may be permitted to disclose credit information to a CRB in such circumstances as where the individual has consented to the disclosure or where the individual has failed to meet payment obligations in relation to credit provided by Site Pro 1 or if the individual has committed a serious credit infringement. Similarly, Site Pro 1 will generally be permitted to disclose credit information to another credit provider about an individual where the individual has consented to such disclosure.

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3. CRB's may include credit information provided by Site Pro 1 in reports provided to other credit providers to assist such other credit providers to assess the individual's credit worthiness. Site Pro 1 shares credit information with the following CRB:

Dun & Bradstreet
 PO Box 7405
 St Kilda Rd
 MELBOURNE VIC 3004
 Email: clientservices@dnb.com.au

A copy of Dun & Bradstreet's credit reporting policies is able to be obtained from its website:
<http://dnb.com.au/privacy-policy.html>

Site Pro 1 may, in the future, disclose credit information to a CRB other than Dun & Bradstreet, but prior to disclosing any credit information about individuals to any other CRB, Site Pro 1 will amend its Credit Reporting Privacy Policy to set out the name and contact details of any such other CRB and will post a notification of the change to the Credit Reporting Privacy Policy on Site Pro 1's website.

Rights in Relation to CRBs

- Individuals have certain rights in respect of CRB's and the information a CRB holds about the individual and those rights include:
 - Opting out of direct marketing pre-screenings. A CRB may use an individual's credit information to assist a credit provider to market to that individual by pre-screening the individual for direct marketing by the credit provider. This process is known as a 'pre-screening'. If an individual does not want a CRB (including the CRB listed above) to use that individual's information for the purpose of pre-screening, the individual has the right under the Act to contact the CRB to request that they exclude the individual from such processes;
 - If an individual is a victim of fraud (including identity-related fraud), an individual is entitled under the Act to request that a CRB not use or disclose credit reporting information they hold about the individual in circumstances where the individual reasonably believes that they have been or are likely to be a victim of fraud, including identity-related fraud. The period while this applies is called a 'ban period'. An individual can make such a request to any CRB, including those listed above.

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Direct Marketing

- As part of Site Pro 1's functions and business activities and to promote the services, Site Pro 1 can provide to its customers, including in respect of Site Pro 1's credit-related activities, Site Pro 1 may be permitted to use personal information about individuals that individuals have provided to Site Pro 1 for the purposes of direct marketing. Direct marketing includes, but is not limited to, sending to and/or contacting individuals in relation to promotions and information about Site Pro 1. All recipients, including individuals, can opt out of receiving direct marketing communications by sending an email to Site Pro 1's Privacy Officer at sales@sitepro1.com.au. In any direct marketing communication recipients are reminded of their right to opt out of receiving direct marketing communications. Moreover, as a general rule, a credit provider such as Site Pro 1 is not permitted to disclose to others credit information about individuals for the purposes of direct marketing.

Anonymity and Pseudonymity

- Individuals would generally have the option of dealing with Site Pro 1 anonymously. However, this only applies where it is not impracticable for Site Pro 1 to deal with individuals acting anonymously or under a pseudonym. For example, individuals making general enquiries of Site Pro 1 may do so anonymously or under a pseudonym. However, if the dealing with Site Pro 1 is for Site Pro 1 to supply goods and services and/or to enter into contractual relations (such as a commercial credit account) with a customer that is the individual or is associated with the individual, then it is impractical for such individuals to deal with Site Pro 1 on an anonymous basis or under a pseudonym.

Links

- Site Pro 1's website may contain links to other websites and those third-party websites may collect personal information about individuals. It is not responsible for the privacy practices of other businesses or the content of websites that are linked to its website. Site Pro 1 encourages users to be aware when they leave the site and to read the privacy statements of each and every website that collects personally identifiable information.

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Security and Storage

1. Site Pro 1 places a great importance on the security of all information associated with its customers, clients and contractors. It has security measures in place to protect against the loss, misuse and alteration of personal information (including credit information) under its control. Site Pro 1 takes all reasonable steps to protect individuals' personal information that is under Site Pro 1's control from misuse, interference, loss and/or unauthorised access, modification or disclosure. All personal information (including credit information) held is kept securely and that which is held electronically is held on secure servers in controlled facilities.
2. Personal information (including credit information) is de-identified or destroyed securely when no longer required and no longer required to be held by the company.
3. Site Pro 1 retains information provided to its staff including individuals' contact and financial and transactional information to verify transactions and customer details and to retain adequate records for legal and accounting purposes. Such information is held securely, including on secure servers in controlled facilities.
4. No data transmission over the internet can be guaranteed to be absolutely secure. As a result, whilst Site Pro 1 strives to protect users' personal information (including credit information), it cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once Site Pro 1 receives a transmission, it makes every effort to ensure the security of such transmission on its systems.

Access To and Correction of Personal Information

1. Site Pro 1 is committed to and takes all reasonable steps in respect of maintaining accurate, timely, relevant, complete and appropriate information about its customers, clients and website users.
2. Any individual may request access to personal information (including credit information) about them held by Site Pro 1. Such a request for access to personal information is to be made to Site Pro 1's Privacy Officer:

Privacy Officer
 Site Pro 1
 7 Activity Street,
 Acacia Ridge QLD 4110

Telephone: 1300 748 377
 Email: sales@sitepro1.com.au

3. Please note Site Pro 1 does require that, as part of any request by an individual for access to personal information (including credit information), the individual verify their identity so that Site Pro 1 may be satisfied that the request for access is being made by the individual concerned.
4. Please note that Site Pro 1 is not required to give an individual access to credit information about them in circumstances where:
 - Giving access would be unlawful; or
 - Denying access is required or authorised by or under an Australian law or a court/tribunal order; or
 - Giving access would be likely to prejudice one or more enforcement-related activities conducted by, or on behalf of, an enforcement body.

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5. Inaccurate information will be corrected upon receiving advice to this effect. To ensure confidentiality, details of an individual's personal information (including credit information) will only be passed on to the individual if Site Pro 1 is satisfied that the information relates to the individual. From time to time, and having regard to the purpose of the collection and use of personal information (including credit information) about individuals, Site Pro 1 may contact individuals to seek confirmation that the personal information provided by the individual is accurate, up to date and complete.
6. If Site Pro 1 refuses to provide an individual with access to their personal information (including credit information) or to correct the personal information (including credit information) held about them, then reasons for such refusal will be provided. Such reasons will set out the grounds for refusal, the mechanisms available to complain about the refusal and any other matters that are required by the Act.
7. Site Pro 1 will respond to any requests for access or correction within a reasonable time of receipt of the request, but by no later than thirty (30) days of the request being received.

Complaints

1. If an individual has a complaint that Site Pro 1 has not complied with its obligations under the Act then any such complaint should be directed in the first instance to Site Pro 1's Privacy Officer at the contact details set out at clause twenty (20) of this policy.
2. Upon receiving a complaint, within seven (7) days, Site Pro 1 will give the complainant written notice acknowledging receipt of the complaint and set out the process of how it will be dealt with. Unless a longer time is agreed by the complainant, the complaint will be investigated and a decision made within thirty (30) days of receipt of the complaint. The decision will be communicated to the complainant. Site Pro 1 aims to resolve all complaints within thirty (30) days of receipt. If it cannot resolve a complaint within thirty (30) days it will notify the complainant of the reasons and specify a date when a decision or resolution is expected to be made and seek the complainant's agreement to extend the thirty (30) day period. If the complainant does not agree then the complaint may not be able to be resolved.
3. It may be necessary (and it may be required by the Act), in order to deal with a complaint, to consult with a credit reporting body or another credit provider. Further, if, while a complaint remains unresolved, Site Pro 1 is disclosing information subject to the complaint to a third party, it may be required to advise the third party about the complaint.
4. If Site Pro 1 finds a complaint is justified it will resolve it and do what is required to rectify any breach. Site Pro 1 is committed to fulfilling its obligations as an APP entity and a credit provider under the Act.
5. If a complainant is not satisfied with the outcome of Site Pro 1's internal complaints procedure in respect of Site Pro 1's privacy practices, then the complainant may refer their complaint to the Office of the Australian Information Commissioner ("OAIC"). The website for the OAIC is: www.oaic.gov.au.

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Transfer of Information Overseas

1. Site Pro 1 utilises local and overseas cloud services for the purpose of storing information. Customers' and clients' personal and/or sensitive information may be disclosed to a Site Pro 1 cloud-service provider for that purpose. While Site Pro 1's cloud-service providers are located in such places as Australia and Singapore, the country location of those providers may periodically change. Site Pro 1 may also from time to time be required to send information overseas to other members of the Valmont Industries Inc. Group or related entities. More information about any of those entities may be obtained by contacting Site Pro 1.

Changes to Privacy Policy

If Site Pro 1 decides to or is required to change this Credit Reporting Privacy Policy, such amendments will be published on its website via the privacy policy page so that users may be aware of any such changes and how they may affect them. As such, please remember to refer back to Site Pro 1's privacy policy page regularly to check whether there are any amendments.

Contacting Us

For further information regarding its privacy policies, please contact Site Pro 1 at the following address:

E-mail: sales@sitepro1.com.au

For more information on privacy legislation and the CR Code please visit the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

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COMPLAINTS HANDLING POLICY

INTRODUCTION

1. Objectives and Purposes of Complaints Handling Policy

Site Pro 1 Australia, a division of Industrial Galvanizers Corporation Pty Ltd ACN 000 545 415 (“Site Pro 1”), is committed to delivering high-quality products and services to those who deal with it. Site Pro 1 is committed to understanding and responding to the needs and concerns of its customers and clients.

The aim of this policy is to provide guidance as to the manner in which Site Pro 1 receives and handles complaints made to Site Pro 1 in respect of Site Pro 1’s business activities and dealings with its customers and clients.

The objective of this policy is to assist Site Pro 1 in dealing with and resolving complaints in an efficient, effective and professional manner.

2. Background

In creating this policy, Site Pro 1 has sought to ensure that its procedures accord with relevant legal requirements and best practice. In particular, this policy has been created to satisfy the requirements of AS ISO 10002-2006 Customer Satisfaction – Guidelines for complaints handling in organisations.

3. What is a Complaint?

AS ISO 10002-2006 defines, a complaint as follows:

“An expression of dissatisfaction made to an organisation, related to its products, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected.”

Site Pro 1 adopts that definition of ‘complaint’ for the purposes of this policy.

Any person or entity who is dissatisfied with a product or service provided by Site Pro 1 for any reason, may contact the company to complain. A complaint may be made in writing or verbally. Certain types of ‘complaints’ may be by way of negative feedback, which may not require a resolution or any response. Whilst Site Pro 1 acknowledges this type of feedback can be useful and valuable, this policy does not apply to such feedback as such feedback does not fall under the definition of a complaint as set out above.

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4. Guiding Principles for Effective Handling of Complaints

Site Pro 1 abides by the guiding principles as set out at section 4 of AS ISO 10002-2006 for effective handling of complaints. The guiding principles set out at section 4 of AS ISO 10002-2006 are as follows:

Principle	Explanation of Principle
Visibility	Information about how and where to complain should be well publicised to customers, clients, Site Pro 1 personnel and other interested parties. This policy is available on Site Pro 1's website and also internally.
Accessibility	The complaints-handling process as outlined in this policy should be easily accessible to complainants and all relevant representatives of Site Pro 1. This policy is drawn in a manner that is easy to understand and sets out simply the process of making and resolving of complaints.
Responsiveness	Receipt of each complaint is acknowledged to the complainant immediately. Complaints will be addressed promptly in accordance with their urgency. Complaints will be handled in an efficient and effective manner and complainants will be treated courteously and kept informed of the process of the complaint through the complaints-handling process.
Objectivity	Each complaint will be addressed in an equitable, objective and unbiased manner through the complaints-handling process.
Charges	The complaints-handling process is free of charge to the complainant.
Confidentiality	Personally identifiable information concerning the complainant is actively protected from disclosure unless the complainant expressly consents to its disclosure.
Customer-focused approach	Site Pro 1 is committed to adopting a customer-focused approach to dealing with complaints. It is open to feedback, including in respect of the form of complaints and it acknowledges the right of customers and clients to complain.
Accountability	Site Pro 1 and its employees accept responsibility for effective complaints-handling procedures, including being accountable for and reporting on the actions and decisions of Site Pro 1 in respect to complaints handling.
Continual improvement	Site Pro 1 is committed to continually improving its complaints-handling processes.

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COMPLAINTS HANDLING

1. Filing a Complaint

Where possible, complaints should be made in writing so that the details of the complaint are clear and complete so that Site Pro 1 may more effectively deal with the complaint.

Complaints should be directed to:

Complaints Officer
 Site Pro 1
 7 Activity Street
 Acacia Ridge QLD 4110

Telephone: 1300 748 377

Email: sales@sitepro1.com.au

2. Information to be Provided When Making a Complaint

When making a complaint, please provide the following information:

- Your name, the organisation you are from (if applicable), your position and contact details;
- Your relationship with Site Pro 1;
- The name of any contact person at Site Pro 1;
- Details of the complaint (including when the conduct giving rise to the complaint occurred);
- Details of any persons or persons of Site Pro 1 involved (if applicable);
- Copies of any documentation that supports the complaint.

3. Help With Making a Complaint

If you require any assistance in formulating or lodging a complaint, please contact the Complaints Officer at the contact details set out above.

4. Acknowledgment of Complaint

Site Pro 1 will acknowledge receipt of a complaint immediately upon receipt and endeavour to resolve complaints within four (4) weeks of receiving the complaint. However, this may not be possible in all instances. Where time to deal with a complaint will exceed four (4) weeks, Site Pro 1 will contact the complainant to inform of the reasons for the delay and indicate when it expects to be in a position to complete its review of the complaint.

5. Your Rights in the Complaints Process

Complainants have the right to enquire as to the status of their complaint by contacting the Complaints Officer or any other employee or representative of Site Pro 1 who has been identified to the complainant as handling the complaint.

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6. Responding to a Complaint

Once Site Pro 1 has reviewed a complaint, it will provide the complainant with a written response. If the complainant is dissatisfied with the response, the complainant has a right to ask for the response to be re-considered by the Complaints Officer. Such a request should be made in writing to the Complaints Officer and forwarded by post or email to the addresses provided above.

7. Further Action

If a complainant remains dissatisfied with the manner in which the complaint has been handled, the complainant may have a right to refer the complaint to some other external resolution body.

QUALITY ASSURANCE

Complaints will be analysed by Site Pro 1's Complaints Officer at regular intervals to identify any recurring or systemic problems. If any such problems are identified, they will consider what actions need to be taken to address any such problems.

Site Pro 1's complaints-handling process will be reviewed periodically in order to enhance its delivery of efficient and effective outcomes in respect of complaints received.

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