



PAC Trading Privacy Policy

Last updated: 12 November 2024

1. Policy scope

- 1.1 Welcome to Pac Trading Pty Ltd (ACN 092 604 343) (**Pac Trading, we, us or our**). We value your trust and take the safe management of your personal information seriously.
- 1.2 When we carry out our activities, we will collect, store, use and disclose personal information. Under Australian law, we are required to protect any personal information you give us.
- 1.3 If you have any questions about how we handle your personal information, please contact our Privacy Officer at the email mentioned at section 12 of this Privacy Policy.

2. Personal information

Personal information is information or an opinion about an identified or reasonably identifiable individual – basically, any information about a person, or that can be used to identify a person. Some examples of personal information include your name, residential and email address, job title and phone number.

3. Types of personal information we collect and hold

- 3.1 When we conduct our business and provide you with our services (together, our **activities**), we will collect and hold the following types of personal information.
 - (a) *Identity and contact details.* Your name, residential and delivery address, mobile number, email address, job title and organisation details.
 - (b) *Account and order history information.* Information about your account, including your username, account email, and other profile information, and information about products that you purchase through our website, including what, how and when you buy from us (to the extent such information is personally identifiable).
 - (c) *Payment information.* We do not store or retain your bank details and payment card details on our website. Please note that payment information is encrypted or tokenized by our third party payment processor, which transforms your payment information into a non-sensitive equivalent.
 - (d) *Interaction information.* We collect text of written and oral communications gathered in the course of our interaction with you, including where you interact on phone calls, social media, emails, provide feedback and online reviews and other information from your interactions with us online.

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- (e) *Digital information.* To the extent such information is personally identifiable, we may collect your digital information when you visit our website or certain third parties' websites, including your device ID and other device metrics, IP address, URLs, search histories and other associated information. For more information on how we use cookies, please see section 8 of this policy.

3.2 Sensitive information is a specific subset of personal information that is afforded a higher level of protection under Australian privacy law. It includes information about your racial or ethnic identity, sexual orientation, health information, political or philosophical beliefs.

3.3 We do not collect your sensitive information. If we do not to collect your sensitive information, we will only ever do this with your consent, or if the collection is permitted or required by law.

4. How we collect and hold personal information

4.1 The ways we may collect your personal information are as follows.

- (a) *Directly from you.* We may collect personal information directly from you in the course of undertaking our activities, when you communicate with us in person (including at any of our stores, other sites or at trade shows), via phone, email and text, as well as from our website and other online platforms, including by using cookies.
- (b) *From publicly available sources.* We may also collect personal information from publicly available sources of information, including via websites, directories, and social media channels.
- (c) *From third parties.* Third parties we engage may provide us with your personal information for the purposes of engaging with our activities, including if we need to validate addresses with Australia Post to improve your delivery experience, or engage third party marketing partners to allow us to better tailor our direct messaging.

4.2 We take reasonable steps to secure your personal information from misuse, loss and unauthorised access, modification or disclosure. Personal information is held securely and is subject to various physical and technical security protections, including access controls, anti-malware and firewall technologies. We also have policies in place to ensure correct handling of personal information, and all personnel handling personal information are trained on its proper handling, storage, and disposal.

5. Purposes for which we hold, use and disclose personal information

5.1 We will use or disclose personal information for the purpose for which we originally collected that information. If we need to use your personal information for any other purpose, we will only do this if we are allowed to under Australian privacy laws. This includes:

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- (a) if that other purpose for which we wanted to use your personal information relates to the original purpose for collection, and you would reasonably expect us to use your personal information in that way; or
- (b) if you give us your consent.

5.2 The purposes for which we collect, hold, use and disclose information include:

- (a) conducting our activities, which includes providing you with our goods and services and engaging with you in respect of those goods and services;
- (b) to communicate information about our activities, including to provide you with customer support when you need this;
- (c) to provide you with information or advertising relating to our activities (including targeted advertisements) or marketing communications we believe may be of interest to you;
- (d) to improve and optimise our platforms (including our websites) and services;
- (e) to help us identify your preferences and shopping patterns, recommend and advertise new features, products and services and personalise your experience on our website;
- (f) for security, safety, investigations and fraud detection purposes, including to respond to your complaints and undertake our own investigations;
- (g) for our internal administrative, research, planning and marketing purposes, including reviewing call recordings for quality and training purposes; and
- (h) to comply with legal obligations and protect our legal interests and rights (including our intellectual property rights).

5.3 We may also disclose personal information to:

- (a) our affiliates and related bodies corporate; and
- (b) our third party service providers, including to:
 - (i) contractors who we engage to deliver our goods and perform services, including delivery providers and couriers who have a need to know your personal information to fulfil your orders;
 - (ii) service providers who offer operational and technical services such as expert data companies (to help us and third parties understand our customers and business);

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(iii) financial services providers (to help us prevent and detect fraud, theft, verify your identity and conduct credit checks when necessary);

(c) third parties when we restructure or dispose of any part of our business. For example, if we are involved in a takeover, merger, restructure and acquisition, we may need to share your personal information as part of those activities; and

(d) law enforcement (where permitted or required by law).

5.4 When we disclose your personal information to third parties, we will comply with our Privacy Policy. However, when it comes to how those third parties use your personal information, this is governed by their privacy policy. We strongly recommend ensuring that you read those policies.

6. Direct marketing communications and targeted advertising

6.1 When you register as a customer or subscribe to receiving communications from us, we may send you direct marketing messages. We may send you these messages via various channels and media (including by email, SMS, phone, chatbot and mail) where you have not opted out of receiving such messages from that exact brand or program in that channel.

6.2 You can unsubscribe or opt out of certain marketing messages by:

(a) using the unsubscribe link in an email or SMS;

(b) adjusting your account settings for advertising on certain websites and social media;

(c) updating the communications preferences in your account settings for the relevant program; or

(d) contacting us and letting us know which communications you no longer want to receive.

6.3 Regardless of whether you unsubscribe from any or all commercial electronic messages, you will still receive information we are permitted by law to provide to you, for example service-based communications. We send different service-based communications (such as communications relating to terms and conditions, your account or your orders).

7. Changes to this Privacy Policy

7.1 We will review and update this Privacy Policy from time to time as needed without notice. Therefore, you should review the terms of this policy periodically to make sure that you are aware of how we collect, hold, store and use personal information. The date listed at the beginning of this page indicates when this Privacy Policy was last updated.

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7.2 If we make a material change to our Privacy Policy and the way in which we handle your personal information, we will inform by issuing a notice that includes a summary of the change. This notice may be provided through our website, via email or through other appropriate communication channels.

8. Cookies

8.1 Like many websites, we use cookies and other similar technologies, for example, to distinguish you from other users when you browse our websites or use our online services and to allow us to improve our online services.

8.2 Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently to improve the user experience, as well as to provide certain information to the owners of the site.

9. Retention, access and correction

9.1 We will only keep records of your personal information as long as they are still necessary for the purposes listed above for which we collected such personal information.

9.2 We will take all reasonable steps to ensure any personal information we collect, use or disclose is up to date and accurate. If you believe personal information that we hold about you is not up to date or accurate, you may ask us to correct it.

9.3 You may ask us to provide you with details of the personal information we hold about you, and copies of that information. We will respond to your request and attempt to provide you with the data within 30 days of receipt of your request.

9.4 Please direct all request for access and correction to our Privacy Officer (see their contact information at section 12 of this policy).

10. Overseas disclosure

10.1 We may, when we conduct our activities, disclose personal information to organisations that are based overseas, including by utilising overseas data servers to process information. Those overseas entities may be located in the Philippines.

10.2 Some of the reasons we may disclose your personal information overseas include:

- (a) where we have made a business decision to engage with a service provider to assist us with certain functions, such as technology and data storage providers;
- (b) for disclosures between our related bodies corporate;
- (c) when you are browsing our products from overseas or ordering from our websites in Australia; or

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(d) where and when we are required to by law.

10.3 Where we share personal information overseas, we take steps to ensure that our overseas service providers are obliged to protect this personal information in accordance with Australian legal requirements and that they are only permitted to use personal information for the purpose for which it is shared.

11. Complaints

11.1 If you consider a breach of the Privacy Act 1988 (Cth) has occurred, you may direct your query to our Privacy Officer using the details set out below and we will attempt to resolve your complaint within a reasonable period (usually, within 30 days).

11.2 If you disagree with our decision, you may contact the Australian Privacy Commissioner at its website www.oaic.gov.au or by telephone on 1300 363 992.

12. Contacting us

If you have any questions about this Privacy Policy or the way in which we handle your personal information, please contact us:

Position Title: Privacy Officer

Email: privacy@pactrading.com.au

Phone: 02 88454888

Post: Building C1/5-7 Shirley St, Rosehill NSW 2142

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