

# Privacy Policy

## JWH Group Pty Ltd

### Vision:

In all our endeavours, to be considered the benchmark by our peers, staff and clients. An exciting, ground breaking organisation.

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## Who are we?

'We', 'us' and 'our' refer to **JWH Group Pty Ltd ACN 098 664 709**, and our related businesses:

- Oswald Homes (1972) Pty Ltd ACN 092 237 879
- Rural Building Company Pty Ltd ACN 105 364 823
- WA Country Builders Pty Ltd ACN 105 402 140
- Constructive Media Pty Ltd ACN 105 896 713
- Residential Building WA Pty Ltd ACN 106 262 382
- Ceiling Force Pty Ltd ACN 119 677 057
- Plunkett Homes (1903) Pty Ltd ACN 009 250 373
- Active Plumbing Pty Ltd ACN 009 340 096

This document is our privacy policy and it tells you how we collect and manage your Personal Information. We respect your rights to privacy under the Privacy Act 1988 (Cth) (**Act**) and we adopt the Act's requirements which govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.aaic.gov.au](http://www.aaic.gov.au).

## What is Personal Information

When used in this privacy policy, the term 'Personal Information' has the meaning given to it in the Act.

In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. It may also include details of your visits to our websites including but not limited to traffic data, location data and web logs.

If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered Personal Information.

## What Personal Information we collect and why

We collect your Personal Information directly from you unless it is unreasonable or impracticable to do so. When collecting Personal Information from you, we may collect it:

- During conversations between you and our representatives;
- When you contact us via our 'Enquiries' and/or our other e-mail addresses with a request for assistance;
- From media and publications;
- From other publicly available sources;
- From cookies, when you provide information to us by filling in forms on this web site;
- When you contact us, for example, to enquire about our services;
- When we collect publicly available information about you or your business (including through electronic data sources); and
- When we collect your personal data from our clients, consultants, suppliers and other advisers including finance brokers and other sources such as accountants and lawyers.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing or clicking on appropriate links.

## What happens if you don't give us your Personal Information?

If you do not provide us with the Personal Information described above, we may not be able to:

- Provide the requested services to you, either to the same standard or at all;
- Provide you with information about our activities and services that you may be interested in;
- Tailor the content of our website to your preferences; or
- Provide a beneficial experience of our website.

## Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will only be used by us:

- For the primary purpose for which it was obtained;
- For a secondary purpose that is directly related to the primary purpose;
- With your consent; or
- Where required or authorised by law.

## Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such cases, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

## Who we share your data with?

We may disclose your Personal Information to our employees, contractors or service providers for the purposes of our business activities or operation of our website, fulfilling requests by you, and to otherwise provide services to you including, without limitation:

- Web hosting providers;
- IT systems administrators and Electronic network administrators;
- Mailing houses;
- Couriers;
- Data entry service provider;
- Professional advisors such as accountants, solicitors, business advisors and consultants; or
- Any organisation for any authorised purpose with your express consent.

## Direct marketing

From time to time we may use your Personal Information to provide you with current information about offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time decline to receive such information by telephoning us on **(08) 9464 7800** or by writing to us at **JWH Group Pty Ltd, PO BOX 55, Westfield Shopping Centre, Innaloo WA 6918. Please mark your envelope "Privacy Policy"**. If the direct marketing is by email, you may also use the unsubscribe function.

We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

## Disclosure of Personal Information

We may disclose your Personal Information:

- to companies that provide information and infrastructure systems to us;
- to anyone, where you have provided us consent;
- where we are required to do so by law, such as under the *Anti-Money or Laundering and Counter Terrorism Financing Act 2006 (Cth)*; or
- to investors, agents or advisers, or any entity that has an interest in our business.

## Security of Personal Information

We have security procedures in place to protect the Personal Information we hold from misuse, loss, unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online.

We also cannot guarantee that the information you supply will not be intercepted whilst being transmitted over the internet. Accordingly, any Personal Information or other information which you transmit to us online is transmitted at your own risk.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Access to this Personal Information is restricted to authorised employees who may require the information in order to perform their duties.

## Access to your Personal Information

We will provide you with access to the Personal Information we hold about you. You may request access to any of the Personal Information we hold about you at any time.

There may be situations where we are not required to provide you with access to your Personal Information, for example, if the information relates to existing or anticipated legal proceedings, if your request is vexatious or if granting access would breach confidentiality or privacy of others.

An explanation will be provided to you if we deny you access to the Personal Information we hold about you.

Where we hold information that you are entitled to access, we will endeavour to provide you with suitable means of accessing the data, for example by posting or emailing it to you. In order to protect your Personal Information, we may require identification from you before releasing the requested information.

## Updating your Personal Information

It is important to us that the Personal Information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your Personal Information has changed.

If you wish to make any changes to your Personal Information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.

If we refuse to correct Personal Information, we will provide you with our reasons for not correcting the information.

## Our Website

In general, we collect statistical information from all our websites collectively, such as what site pages users visit more frequently, time online and what services users most frequently access. This data is used anonymously and in the aggregate. We use this information to evaluate our website performance, continually improve our services and to assess the success of our marketing and advertising campaigns.

### Cookies

Some of this statistical information is collected automatically by using cookies, such as when you access our websites, we may send a 'cookie' to your computer - a small summary file containing a unique ID number. We use cookies to measure traffic patterns, site page visits and to measure transaction patterns in the aggregate. We research this data so that we can improve our online services. If you do not wish to receive cookies, you can set your browser settings so that your computer does not accept them.

We may log IP addresses (electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users' movements, and gather broad demographic information.

### Analytics

We use Google Analytics to help us understand how our customers engage with our websites. For information on how Google uses your Personal Information here: <https://privacy.google.com/intl/en-GB/yourdata.html>. To opt-out of Google Analytics, visit: <https://tools.google.com/dlpage/gaoptout>.

## Comments and Contact Forms

When visitors leave comments or contact information on our sites, we collect the data shown in the comments or contact forms, and also the visitors IP address and browser user agent string to help spam detection.

## Other Websites

Clicking links on our website may result in your transfer to another website where data privacy policies and practices may be different to JWH Group Pty Ltd. It is your responsibility to familiarise yourself with these privacy policies as we have no control over them or any information or data collected by or for them and accept no responsibility for them.

## Third-party plugins

Some services integrate third-party plug-ins, such as the Facebook “like” button. Even if you do not click on these plug-ins, they may collect information about you, such as your IP address and the pages that you view. They also may set and/or access a cookie. These third-party plug-ins are governed by the privacy policy of the company providing them.

## Complaints

If you are dissatisfied with how we have dealt with your Personal Information, or you have a complaint about our compliance with the Privacy Act, you may contact our office in writing with sufficient details regarding your complaint with any supporting evidence and/or information at **JWH Group Pty Ltd, PO BOX 55, Westfield Shopping Centre, Innaloo WA 6918. Please mark your envelope “Privacy Policy”**

We will acknowledge your complaint within seven days. We will provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer you may make a complaint to the Privacy Commissioner which can be contacted on either [www.oaic.gov.au](http://www.oaic.gov.au) or 1300 363 992.

## Change in our privacy policy

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices. As a consequence, we may change this privacy policy from time to time or as the need arises. You may request this privacy policy in an alternative form.