

# Empro Pty Ltd Privacy Policy

Empro Pty Ltd (ACN 124 994 574) recognises the importance of protecting personal information and is committed to respecting your privacy rights. This Privacy Policy tells you how we collect information from you and what we do with it.

We are compliant with the Australian Privacy Principles in the *Privacy Act 1988* (Cth) (**Act**) in relation to the handling of personal information. A full version of the Australian Privacy Principles, contained in Schedule 1 of the Act, can be found at the Office of the Australian Information Commissioner website – <http://www.oaic.gov.au/>.

## Definitions

For the purposes of this Privacy Policy, all references to “Empro”, “we”, “us” or “our” in this statement are references to Empro Pty Ltd (ACN 124 994 574).

The terms “customer” or “you” in this statement includes all visitors to our website, growers, suppliers, retailers, wholesalers, importers, purchasers and any other customers of our services and products.

The term “services” refers to the services offered by Empro by importing, wholesaling and distributing market produce to local and national supermarkets, wholesalers and retailers.

The term “our website” refers to our website at <http://emprovegetableswholesale.com.au/>.

## Collection and Use of Information

Empro only collects personal information that is necessary or directly related to our business functions or activities with you. Personal information will always be obtained lawfully and fairly, and will be collected directly from you whenever it is reasonable and practicable to do so in the provision of Empro’s services to you.

We collect information from you when our services are engaged as a wholesaler, importer, distributor or you have any other dealings with us.

The kinds of personal information Empro gathers may include:

- your name and address (including mail, fax, email and telephone details);
  - date of birth;
  - business ABN or ACN;
  - any related trust entities;
  - if applicable, the ABN of the trust entity;
  - details relating to your employment which are relevant to us;
  - payment information, such as credit card or bank details;
  - financial information indicative of a capacity to pay, particularly in circumstances whereby a guarantor is required for a transaction of services;
- and

- any other information pertaining to the services Empro is engaged for by you.

If Empro receives personal information from you that we did not ask for, and that personal information is sensitive information or is not reasonably necessary for our functions or activities, we will destroy or de-identify the information.

It is unlikely that Empro will use the services of an overseas data centre, however if we do store your information in an overseas data centre it will be done in compliance with the *Privacy Act 1988* (Cth) and we will inform you prior to any storage of data overseas.

We may disclose your information to third parties outside of Empro if you give us express permission to do so, or if we are required to do so by law.

We may disclose your personal information to third parties who directly work with us in our business to provide, promote or improve the products or services you have requested or engaged Empro for. Employees of Empro have access to personally identifiable information. All employees are bound to uphold this policy and observe your right to privacy and confidentiality.

You do not have to disclose your personal information to us, however if it is not disclosed, further engagement of our services may not be possible under usual terms of business. Empro will endeavour to accommodate any requests not to disclose personal information to us, however alternative terms of trade may be required for the provision of our services. You may request that we do not transfer any of your information outside of Australia, or revoke our permission to do so, but in such case we may not be able to provide the services or products you have requested from us.

Empro will only use your personal information for the purposes of:

- providing services to you, in accordance with our terms and conditions and the contract entered into between us;
- invoicing and collections of monies. This will include sending you emails, invoices, and notices of delinquency;
- providing customer service and to obtain feedback;
- improving the services we offer;
- meeting legal requirements such as complying with court orders and valid subpoenas;
- prosecuting and defending a court, arbitration or similar proceeding.

We store all emails, invoices, statements and correspondence, and endeavour to keep records of all verbal and written communications so we have a history of our interactions with you to provide our services to you in an accurate and efficient manner.

Should you wish to alter your personal information with Empro, please contact our office and advise of the requested amendment. We confirm our office will amend the information in our system within 5 business days.

## **Opt-out Notifications**

You may opt-out of receiving email communications from Empro at any time. You need to email us to have us exclude your email from our email distribution list. We endeavour to process opt-out notifications immediately, but please allow up to five business days for the removal to be completed. We note that should you opt-out of receiving emails from Empro, invoices and any other related correspondence will be sent to your nominated postal address.

## **Tracking Usage**

The use of cookies and tracking technology may record information such as Internet domain and host names, Internet protocol (IP) addresses, browser software and operating system types, click-stream patterns, and dates and times that our site is accessed. The use of cookies and other tracking technologies allows us to improve our website and your browsing experience. We may also evaluate information that does not contain personal information for trend analysis.

## **Other Websites**

You may be able to access other sites by clicking on links that we have provided on any part of our website. We are not responsible for the privacy practices or the content of these linked websites.

## **Change Notifications**

Any changes to this Privacy Policy will be posted to our website. Changes to our Privacy Policy will become effective as of the date we post on our website and will generally be notified by means of an update on our website. Our Privacy Policy is also available by contacting our Privacy Officer by email at the address detailed below.

## **Data Accuracy and Security**

Every effort will be made to ensure the security of your personal information to protect it from misuse, interference, loss or unauthorised access, and to ensure that your personal information is complete and accurate. If your data changes, then you are responsible for notifying us of those changes so that we can keep your details up-to-date and accurate. When no longer needed, reasonable steps will be taken to ensure that your information is destroyed and/or de-identified. Unless an exemption under the Privacy Act applies, we will, at your written request, provide you with a copy of any personal information which we hold about you. We will inform you of any applicable fee and obtain your agreement to it before providing any information.

## **Privacy Queries, Corrections and Complaints**

To access, correct or update your personal information, or to raise a question or concern or complaint regarding Empro's collection and use of personal information please email us at [admin@empro.com.au](mailto:admin@empro.com.au)

or notify us by mail at:

Empro Pty Ltd  
Mail Point 87  
280 Bannister Road  
Canning Vale WA 6155

Any complaint regarding our collection or use of your personal information (**Privacy Complaint**) must be made in writing either by email or post to our office. Your complaint should set out the type of personal information that is the subject of the complaint, and details of the alleged improper collection or use.

Within 5 business days of receiving a Privacy Complaint, Empro will respond to you acknowledging receipt of the complaint. This acknowledgement will also include the contact details of the person responsible for reviewing your Privacy Complaint, and an estimated substantive response time. Empro will then conduct a review of your Privacy Complaint and provide you with a substantive response within 20 business days of the receipt of your Privacy Complaint. The substantive response will also include information regarding how you may make a complaint to the Information Commissioner should you not be satisfied by our response.

For more information on your rights regarding complaints, please refer to the website for the Office of Australian Information Commissioner at <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>

## **Destruction of records**

When Empro no longer requires your personal information, and has no legal obligation to maintain records of it, we will either destroy or de-identify your personal information.

## **Notifiable Data Breach**

If Empro identifies reasonable grounds to believe that unauthorised access or disclosure of your personal information has occurred, or that your personal information has been lost and is at risk of being subject to unauthorised access or disclosure, then Empro will notify you in writing and provide you with a copy of the written statement which Empro provides to the Information Commissioner. The following information will be included in the written statement:

- a description of the possible data breach that may have occurred;
- what kind of personal information has potentially been affected;
- recommended steps you should take in order to protect yourself; and
- if applicable, the details of the source of the data breach if Empro has reasonable grounds to believe the data breach was constituted by a third party.

Should Empro be unable to contact you, then we will publish the above information on our website.