

## About this document

This privacy policy outlines:

 the policy of The Trustee for Irvine Moving Trust trading as Caroline Springs Self Storage

ACN: 603 208 466 Address: 16 Waigani A

 Address:
 16 Waigani Ave, Deer Park, VIC 3023

 Contact
 (03) 9360 5599

details: <u>info@carolinespringsselfstorage.com.au</u>

 how and why we need to collect and retain your personal information, and how we handle, protect, use and disclose that personal information.

### **Collection of information**

We need to collect, retain and use information about you, including your personal information, to provide you with storage and do business with you. Generally, this information is collected directly from you, but we may collect information about you that is publicly available, for example from public registers or social media, or made available by third parties. Information we collect may include:

- your name
- licence number and details
- date of birth
- passport number
- telephone number(s)
- email address
- physical address
- CCTV footage and/or audio; and
- any other information reasonably necessary.

We may also need to collect payment information from you, including credit card or direct debit information, and we collect and retain information about your ongoing storage and payment history.

When you use our website or mobile applications, we may collect information about your physical location and/or web activity including your IP address, your telephone number(s) and whether you've accessed or been referred to us via a third-party site. Some of this website information we collect using Cookies.

You may choose not to provide us with any of this information, but not doing so may affect our ability to provide you with storage.

#### **Primary purposes of collection**

We need to collect information from you for a variety of purposes including to provide you with storage and do business with you. We also need to collect information from you to:

- ensure security of the facility and the goods and people within the facility
- establish your identity and assess your application for storage
- be able to contact you during the storage relationship
- provide you with information about your account, including billing and provision of notices
- provide you with information about our business and related entities, including promotions
- be able to answer questions from you about your account and our services
- manage our risk, including enabling us to undertake a search of the StorerCheck database, or any relevant credit history entity

- assist other storage facilities manage their credit risk, by uploading your information to the StorerCheck database
- undertake appropriate searches, including a PPSR search, if your account goes into default
- cooperate with enquiries from government and law enforcement bodies and comply with our legal obligations
- enforce our agreement with you.

#### **Disclosure**

We may disclose any information we have about you including your personal information as is reasonably necessary or as is permitted by law, including but not limited to the following:

- our employees, including temporary workers or externally contracted staff
- service providers engaged by us, such as data storage, IT, software management, insurers and financial services
- third parties engaged to perform specific functions within our business, such as auctioneers, second-hand dealers, building contractors, and maintenance services
- government departments and agencies
- law enforcement agencies, including the police
- investigators
- any person who can demonstrate to our satisfaction a legal or equitable interest in the goods stored
- liquidators, administrators, or other persons appointed to administer your financial affairs
- debt collection services
- your Alternate Contact Person (ACP)
- the StorerCheck database (and in effect, other storage facilities / members of the Self Storage Association of Australasia that may, at their discretion, search the StorerCheck database to verify whether you are a credit risk)
- Storers or third parties who reasonably believe you have caused damage or injury to that Storer or third party
- agents for any of the above.

We may send your information overseas. Some Self Storage Association of Australasia members, as well as some of our service providers or other third parties, including data storage providers, may be located, operate, or hold data outside of Australia. When information is sent or disclosed outside of Australia, we take reasonable efforts to ensure that appropriate data handling and security arrangements are in place.

We utilise service providers who are located in several countries outside Australia, including New Zealand, the UK, the USA.

Please note that Australian laws may not apply to some of these entities in those countries.

#### Alternate Contact Person

You make the following authorisation regarding your Alternate Contact Person:

As you have provided us with personal information identifying your nominated Alternate Contact Person (ACP), you must ensure that you have the right to disclose information about your ACP including their personal information. You must take reasonable steps to ensure your ACP is aware that:

- you have made this disclosure
- we may use this information as we would personal information collected about you
- they may access and correct the information held by us in the same manner you may correct your personal information.

#### Marketing

We may use your contact details, including email and telephone numbers, to contact you for marketing purposes. You may withdraw this consent at any time. We may share your information with our related entities. We will not share your contact details with third party enterprises and will never sell your personal information or contact details. If you wish to opt out of direct marketing, please contact us at: info@carolinespringsselfstorage.com.au

#### **StorerCheck**

For credit and risk management purposes, we use the StorerCheck database. By applying to store with us, including making a web or telephone enquiry, **you agree to the following**:

- We may search the StorerCheck database for information that has been reported by other users of the StorerCheck database about you.
- We may communicate with other users of the StorerCheck database and discuss your information with them.
- We may choose to refuse you storage, or terminate your storage agreement, if you are listed on the StorerCheck database.
- We may release or update any details and personal information listed on the StorerCheck database about you, including but not limited to your name, address, previous addresses, email addresses, licence number and details, passport number and details, date of birth, storage history and account payment history.
- Your details and personal information will be uploaded on the StorerCheck database if you breach your storage agreement or engage in illegal or threatening behaviour including but not limited to not paying for storage, dumping or abandoning goods, being chronically late with payments, being abusive or threatening to staff or other storers, eliciting the involvement of law enforcement agencies, such as law enforcement enquiries regarding your storage activities and the execution of search warrants against you, this facility or your storage space or any other breach of the storage agreement.

We may use the information you provide during this application, including web or telephone enquiries, or information provided at any other time to update any listing currently about you on the StorerCheck database. If you do not consent to these terms, you should not apply for storage with us.

By applying to store with us you consent to the terms and conditions set out in this document and on-line at www.storercheck.com, including our right to search StorerCheck for your details, and to upload your information and details to the StorerCheck database in certain circumstances. For further information about the StorerCheck database go to www.storercheck.com.au.

#### **Security**

We keep your information provided to us in both hard form and electronic form. We take steps to secure this from misuse, loss, unauthorised modification, unauthorised disclosure and access. We employ physical security such as locks on filing cabinet and restricted access to hard files, and other security measures including password protected computers and internet firewalls.

We take reasonable care when engaging third parties to provide services to us where those service may necessitate the third party handling your information, including data storage, file destruction, enforcement of the agreement in any way and debt collection.

# Accuracy of information we hold about you, your right to access and your right to correct

You may view and correct your personal information by:

- giving us reasonable notice in writing that you wish to view your personal information, and
- attending at our Facility at the agreed time, and

• paying reasonable costs for the provision of access. If we refuse access, we will provide you with a written reason for the refusal.

To correct inaccurate information we hold about you, you may advise us in writing that your personal information is not correct and provide us with written corrections. We will endeavour to update within a reasonable time.

#### **Eligible data breach**

Where there are reasonable grounds to believe there has been an eligible data breach we will, within 30 days of when we first become aware of the suspected breach, undertake a reasonable and expeditious assessment of the potential breach.

Where it is determined that an eligible data breach has occurred, we will report the breach to the Office of the Australian Information Commissioner and you.

# Your rights – how to contact us about your privacy

If you believe we have breached the Privacy Act 1988 or Australian Privacy Principles and wish to complain, please contact us info@carolinespringsselfstorage.com.au We will endeavor to resolve your complaint within 21 days.

If you do not believe your complaint has been satisfactorily handled or resolved, you can lodge a complaint with the Office of the Australian Information Commissioner. For more information visit: <u>www.oaic.gov.au</u>