

1. Purpose

- 1.1. Shayher Group and its related entities (referred to as we, our, us) recognise that your privacy is important. We are committed to protecting the personal information we collect, use and hold, and to complying with the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**), and the Notifiable Data Breaches (NDB) scheme.
- 1.2. This Privacy Policy explains how we collect, hold, use, disclose and protect your personal information, and how you can access, correct or complain about the handling of your information.

2. What is Personal Information?

- 2.1. "Personal information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable, regardless of whether it is true or recorded in a material form. Examples include your name, address, date of birth, email address, phone number, and employment details.
- 2.2. "Sensitive information" is a special category of personal information (e.g. health information, racial or ethnic origin, political opinions, religious beliefs, trade union membership, sexual orientation, criminal record). We only collect, use or disclose sensitive information with your consent or where permitted by law.

3. What Information We Collect

- 3.1. We may collect and hold information such as:
 - (a) name, mailing/street address, email, telephone number, and date of birth;
 - (b) details of services or products you purchase or enquire about;
 - (c) information you provide directly via forms, applications, surveys, our websites, and other interactions;
 - (d) records of your communications with us;
 - (e) technical information (IP address, device type, browser, location data, website usage statistics) collected through cookies and tracking technologies;
 - (f) information from third parties acting on your behalf (e.g. financial advisers, agents).
- 3.2. We may also collect de-identified or aggregated information for analytical and reporting purposes.

4. How We Collect Information

- 4.1. We collect personal information:
 - (a) directly from you (online forms, conversations, applications);
 - (b) automatically through our websites, online platforms, cookies and similar technologies; and
 - (c) from third parties, such as referrers, contractors, and service providers.
- 4.2. You may choose to disable cookies in your browser, but some site features may not function properly.

5. Why We Collect, Hold, Use and Disclose Information

5.1. We collect, hold, use and disclose personal information to:

- (a) provide products and services you request;
- (b) respond to enquiries and communicate with you;
- (c) improve our services, websites, systems and customer experience;
- (d) conduct business operations and engage contractors, service providers and related entities;
- (e) undertake marketing and promotional activities (with opt-out options);
- (f) update and maintain accurate records;
- (g) investigate and resolve complaints; and
- (h) comply with legal obligations, cooperate with regulators, and manage risk.

5.2. We do not sell your personal information. We only disclose it to third parties where reasonably necessary for our functions, or with your consent.

6. Direct Marketing

- 6.1. We may use your contact details to send information about our services, updates or events.
- 6.2. You can opt out at any time by using the unsubscribe link or contacting us.
- 6.3. We do not provide your information to unrelated third parties for their marketing without your consent.

7. Cross-Border Disclosures

- 7.1. Some of our contractors, cloud service providers or data processors may be located overseas. Where we transfer your personal information outside Australia, we take reasonable steps to ensure the recipient protects it in accordance with the Privacy Act.

8. Data Retention & Security

- 8.1. We retain personal information only as long as reasonably necessary for our business purposes and legal obligations. When no longer required, it will be securely destroyed or de-identified.
- 8.2. We take reasonable physical, technical and organisational measures to protect your information, including encryption, access controls, monitoring and secure storage systems. However, no system is completely secure, and we cannot guarantee against all risks of misuse, loss or unauthorised access.

9. Data Breaches

- 9.1. In the event of an eligible data breach (where unauthorised access, disclosure or loss is likely to cause serious harm), we will promptly notify affected individuals and the Office of the Australian Information Commissioner (**OAIC**) in accordance with the NDB scheme.

10. Access and Correction

- 10.1. You may request access to, or correction of, the personal information we hold about you by contacting us (see section 12). We will respond within a reasonable time and may need to verify your identity.
- 10.2. We may refuse access in certain circumstances (e.g. privacy of others, legal restrictions).
- 10.3. If we do not agree to a correction, you can request a note be attached stating you disagree.

11. Children's Privacy

- 11.1. Our services are not directed to children under 15, and we do not collect their personal information without parental or guardian consent.

12. Complaints

- 12.1. If you believe your privacy has been breached, please contact us in writing with details of the issue.
- 12.2. We will investigate and provide a written response.
- 12.3. If you are not satisfied with our response, you may escalate the complaint to the OAIC (www.oaic.gov.au).

13. Contacting Us

Privacy Officer
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George St QLD 4003

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Email: info@shayher.com.au