



Privacy Policy

Moveage Group Pty Ltd – ABN 83 605 673 658

Last Updated 09 April 2019

Moveage Group Pty Ltd takes protecting the privacy of our customers seriously.

In order to interact with us and use our services you will need to provide some personal information to us. This Privacy Policy explains why this is so, how we use the personal information that you provide, and how we keep that information safe.

This Policy is subject to any terms and conditions that may apply to our services or offers from time to time.

This Policy may be amended from time to time. When an amendment is made, we will post a revised version of the Policy on our website.

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1 DEFINITIONS

The Act means the *Privacy Act 1988* (Cth) incorporating the National Australian Privacy Principles contained in Schedule 1 of the Act, and the amendments of the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Cth).

The Company/“we” means Moveage Group ABN 83 605 673 658.

Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

Privacy Officer is the person appointed to the position of Privacy Officer for the Company whose contact details are available in section 11 of this Privacy Policy.

Sensitive Information means information or an opinion about an individual's:

- Racial or ethnic origin; or
- Political opinions; or
- Membership of a political association; or
- Religious beliefs or affiliations; or
- Philosophical beliefs; or
- Membership of a professional or trade association; or
- Membership of a trade union; or
- Sexual orientation or practices; or
- Criminal records;

that is also personal information; or

- Child Support Assessments from the Department of Human Services;
- Right to work in Australia;
- Visa details.

2 WHY WE COLLECT PERSONAL INFORMATION AND HOW WE USE IT

We collect personal information primarily so that we can provide our products and services to you. Your personal information may be required for a number of reasons, including but not limited to:

- Allowing our friendly removalist to relocate your home or office;
- Assisting you with your storage needs;
- Allowing us to respond to enquiries, feedback or complaints;
- Processing orders;
- Third party scheduling, operating or payment systems such as Stripe and CRM;
- Notifying customers of changes to removal dates or times;
- Promoting our products and services;
- Staff recruitment; and
- Complying with legal and regulatory requirements.

The types of information we collect may include:

- Your name, address and contact details;
- Payment details/history;
- Details/history relating to your transactions, and interaction with our products and services;
- Itemised inventory lists of items moved and stored, including the aggregate insured value;
- Images of items to be moved or stored and images of your property or premises, in particular the entry and exit points.
- Images and voice recordings from CCTV footage, dashcam, and internal workplace cameras;
- GPS tracking of work vehicles;
- Bank Account details, superannuation member number, tax file number, drivers licence, next of kin and medical certificates; and
- Complaint details.

Where we do collect personal information, we will make all reasonable attempts to ensure it remains accurate and up to date.

3 EXEMPTIONS IN RELATION TO EMPLOYEE RECORDS

The Australian Privacy Principles do not apply to employee records. Records that are directly related to the employment of Moveage Group employees are exempt from the operation of this Policy.

4 SENSITIVE INFORMATION

We will only collect sensitive information that is reasonably necessary for, or directly related to our functions or services.

Where we do collect sensitive information, we will only do so after obtaining your consent or if we are required to do so by Australian legislation.

5 HOW WE COLLECT PERSONAL INFORMATION

There are several ways in which we may collect personal information from you including, but not limited to:

- Our website forms (get a quote or contact us);
- Booking forms;
- Telephone calls;
- Email;
- The use of credit and debit payment cards; and
- Employment information forms and questionnaires.

When you visit our website, we may collect information other than personal information. This may happen even if you are only browsing. Rest assured we will only ever use this information in an anonymous and aggregated form. Information of this type includes:

- Your server's IP address (an identifier unique to the device that you use to surf the web);
- Your browser and operating system details;
- The date, time and duration of your visit; and
- Information about your visit, such as which pages you viewed.

6 HOW WE PROTECT PERSONAL INFORMATION

The security of personal information is very important to us. We take all reasonable precautions to protect the personal information that we hold from misuse, loss, unauthorised access, modification or disclosure.

Our site also has SSL installed – a standard security technology for establishing an encrypted link between a web server and a browser. This link ensures that all data passed between the web server and browser remains private.

7 UNAUTHORISED ACCESS OF YOUR PERSONAL INFORMATION

Moveage Group Pty Ltd does not anticipate any unauthorised access to personal information will occur and takes all reasonable steps to ensure that it does not. If we have reason to believe unauthorised access has occurred amounting to an eligible breach pursuant to the Privacy Act 1988, Moveage Group Pty Ltd will respond in accordance with **Appendix 1 – Data Breach Response Plan**.

8 ACCESSING YOUR PERSONAL INFORMATION

Should you require a copy of your personal information that we hold on file, we will happily provide this within 30 days of your request.

We will only ever use your personal details to contact you for marketing purposes where you have given us consent to do so. Consent is implied by enquires through a comparison portal, our website, or where you do not inform us that you do not wish to receive promotional material. Consent is also implied if your details are on the officially contactable list of an external data provider.

9 COOKIES AND WEBSITE ANALYTICS

A cookie is a small piece of data created by a website and stored by your web browser. Cookies make it possible for a website to keep track of your actions and preferences over time. Our website is configured to use cookies to make your visit more enjoyable, but you do not need to accept cookies to use our website.

10 LINKS TO THIRD PARTY WEBSITES

This website may contain links to websites owned or operated by third parties. We take no responsibility for the privacy practices or content of such websites. Please click with caution, and read the privacy policies of any such websites carefully.

Our website also incorporates interfaces to certain social media websites, including Facebook and Twitter. Before using these interfaces, please read the privacy policy of those websites carefully.

Whether or not you provide personal information to us is entirely up to you, but we may not be able to provide our services or products to you without it.

When we collect personal information, we endeavour to let you know why we are doing so, and how we intend to use that information.

11 COMPLAINTS

If you wish to make a complaint about our Privacy Policy or the way your information has been handled, you may do so by lodging a written complaint with our Privacy Officer. Our Privacy Officer will investigate the complaint and you will be advised of the result of the investigation within 30 days of the complaint. Should you be dissatisfied with the response, you may make a complaint to the Office of the Australian Information Officer.

The details of our Privacy Officer are outlined below:

The Privacy Officer

Katharina Haire

Moveage Group Pty Ltd
30 French Avenue
BRENDALÉ QLE 4500
1300 013 279
info@moveage.com.au

12 CONTACT INFORMATION

If you have any queries or concerns about anything you have read in this Policy, please do not hesitate to contact us (info@moveage.com.au).

ANNEXURE 1 – Data Breach Response Plan

In the event of a Data Breach, staff members must adhere to the four step process set out below (as described in the Office of the Australian Information Commissioner's (**OAIC**) *Notifiable Data Breaches scheme: Resources for agencies and organisations.*) It is important that appropriate records and any evidence are kept of the Data Breach and the response.

Step 1 - Confirm, contain and keep records of the Data Breach and do a preliminary assessment

1. The staff member who becomes aware of the Data Breach or suspects a Data Breach has occurred must immediately notify the Privacy Officer. That person must take any immediately available steps to identify and contain the Data Breach and consider if there are any other steps that can be taken immediately to mitigate or remediate the harm any individual could suffer from the Data Breach.
2. In containing the Data Breach, evidence should be preserved that may be valuable in determining its cause.
3. The Privacy Officer must make a preliminary assessment of the risk level of the Data Breach. The following table sets out examples of the different risk levels.

Risk Level	Description
High	Large sets of personal information or highly sensitive personal information (such as criminal records) have been leaked externally.
Medium	Loss of some personal information records and the records do not contain sensitive information. Low Risk Data Breach, but there is an indication of a systemic problem in processes or procedures.
Low	A few names and email addresses of customers accidentally disclosed to trusted third party (e.g. where email accidentally sent to wrong person). Near miss or potential event occurred. No identified loss, misuse or interference of personal information.

4. Where a **High Risk** incident is identified, the Privacy Officer must consider if any of the affected individuals should be notified immediately where serious harm is likely.

Step 2 - Assess the Data Breach and evaluate the risks associated with the Data Breach including if serious harm is likely

5. The Privacy Officer is to take any further steps (i.e. those not identified in Step 1) available to contain the Data Breach and mitigate or remediate harm to affected individuals.
6. The Privacy Officer is to work to evaluate the risks associated with the Data Breach, including by:
 - a. identifying the type of personal information involved in the Data Breach;

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- b. identifying the date, time, duration, and location of the Data Breach;
 - c. establishing who could have access to the personal information;
 - d. establishing the number of individuals affected; and
 - e. establishing who the affected, or possibly affected, individuals are.
7. The Privacy Officer must then assess whether the Data Breach is likely to cause serious harm to any individual whose information is affected by the Data Breach, in which case it should be treated as an Eligible Data Breach (EDB).
8. The Privacy Officer should also consider whether any of the limited exceptions apply to the Data Breach if it is otherwise an EDB.
9. All reasonable steps must be taken to ensure that the assessment is completed as soon as possible and in any event within **30 days** after they suspect there has been a Data Breach.

Step 3 - Consider Data Breach notifications

10. As soon as the Privacy Officer knows that an EDB has occurred or is aware that there are reasonable grounds to believe that there has been an EDB, they must prepare a statement using the **Notification Statement of an Eligible Data Breach** form and submit it to the Information Commissioner.
11. After completing the statement, unless it is not practicable, the Privacy Officer, must also take such reasonable steps to notify the contents of the statement to affected individuals or those who are at risk from the EDB.
12. If it is not practicable to notify some or all of these individuals, the Privacy Officer must publish the statement on their website, and take reasonable steps to otherwise publicise the contents of the statement to those individuals.

Step 4 -Take action to prevent future Data Breaches

13. The Privacy Officer must enter details of the Data Breach and response taken into a Data Breach log. The Privacy Officer must, every year, review the Data Breach log to identify any reoccurring Data Breaches.
14. The Privacy Officer must conduct a post-breach review to assess the effectiveness of the Moveage Group's response to the Data Breach and the effectiveness of the Data Breach Response Plan.