



APCO – Privacy Policy

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General

The Australian Packaging Covenant Organisation Ltd. (“APCO”) (ABN 99 056 538 480) is a public company limited by guarantee and a provider of services to the Australian consumer packaging industry.

This Privacy Statement sets out how we collect, store, disclose and update any data we collect about you. Please contact us if you have a question that is not answered by this Privacy Statement.

APCO complies with the *Privacy Act 1988* and the Australian Privacy Principles (APPs).

From time to time we will update this Privacy Statement without prior notice. It is up to you to review this Privacy Statement each time you use our Website, provide personal information or make any purchases.



Collection of information

We collect personal information from you when it is reasonably necessary for a business purpose. Personal information may include information like your name, address, date of birth, gender, occupation, interests, location, contact details, payment details, financial information, and information about how and where you purchase and use our services.

We collect personal information in a number of ways including by personal contact, as well as via mail, telephone, email and our Website. Information may also be collected from publically available sources including from telephone records or public registers and from private sources, including real estate agents, where it is necessary to identify customers.

When requesting services from APCO you may be required to provide personal information that will allow us to identify you and provide you with any services you request. If you fail to provide us with the personal information we request, we may not be able to offer you our services. The information that we collect as part of this process may change from time to time.

You may be required to provide us with additional information by other means including, but not limited to, email, phone or mail. When we ask you for further information in addition to that you provide to us when registering we will tell you why we are collecting that information. Any information we collect about you will be kept securely by us. We use up-to-date security, firewall, and anti-virus and encryption software to ensure the security of the data we keep.

What we collect straight from you

We collect most personal information directly from you. For example, you may fill out a form online or in person or give information to one of our representatives on the phone.

You can choose not to provide your personal information or may just want to deal with us anonymously. If this happens we may not be able to provide you with the services you have asked for or give you the level of service that you expect.

What we collect while you are with us

We also collect personal information during our relationship with you. For example, we may collect personal information:

- When you pay a bill or purchase services.
- When you use our services, apps or website.

What we collect from your online activity

Our websites and apps use cookies and other digital identifiers. These may include:



- Site performance identifiers: these give us information about how our websites or apps are used. This helps us provide you with more user-friendly experience.
- Analytics cookies: we use these to gather statistics about our site and apps. For example they help us monitor how many users are on the site or app, and what sections are most popular.

We may also use cookies or digital identifiers so that when you visit third party websites, relevant advertising from APCO can be displayed to you.

It is important to know you can clear cookies or digital identifiers from your device and also disable future use of them by changing the security settings on your web browser.

What we collect from others

Other people may give us personal information about you.

We may also collect personal information from other companies that are able to disclose it to us, if it is not practical to collect it from you. We will take reasonable steps to make sure that you know that we have your personal information, how we got it and how we'll use it.

Your credit situation

We collect some types of personal information to assess your credit situation when you apply for certain services. For more information, see the section on 'Credit-related information' below.

Sensitive personal information

When we talk about sensitive information, we mean details about your race, ethnicity, politics, religious or philosophical beliefs, sexual preferences, health, genetics or criminal record.

Generally speaking, we don't usually need sensitive information about you unless we are required to obtain it as part of our legal obligations.

There may be times when you choose to tell us about your health, and we might collect biometric information for use with new technologies like voice or fingerprint recognition. This could happen as technology changes and evolves over time.

Remember, this kind of information will only be collected with your permission, and we will only use it for the purpose for which you provided it.

Use of anonymous information

Any visitor to our Website will leave a trace in the form of an IP address. This information is not personal in that we cannot use it to identify you. However, you should be aware that we do collect this information to help us determine how and why people visit our Website and to improve our Website and the Services that we offer.



Use of personal information

APCO uses your personal information to provide you with any services that you request, to update our Website, to comply with our legal or regulatory obligations, to improve the services that we provide and to develop our business. We may use your personal information to send you marketing messages including by electronic means, SMS, MMS for an unlimited period. You may opt out of receiving such messages at any time provided such messages are sent by us. We will give you the opportunity to opt out within the message that we send to you.

Advertising

We may use your personal information to send you advertising that is customised or more relevant to your interests, characteristics or general location. This doesn't necessarily mean you'll get more advertising. It just means that the advertising that you see will hopefully be more relevant to you.

Advertising our services

We advertise by mail, phone, email, text, and online via the internet and in apps.

Advertising other service or products

We also work with other organisations. We don't give them access to your personal information when we do this. Instead, we work with them to understand the type of audience they want to advertise to, and deliver the promotional material for them.

Opting out

We'll make sure that any marketing emails, texts and letters we send you clearly tell you how to opt out, or you can tell our phone staff.

If you opt out, you can choose to opt out of particular direct marketing, or all direct marketing. Of course, there are some types of marketing we can't control on an individual basis, like general promotional campaigns or online promotions that are not targeted specifically to you.

Credit information

We use personal information to assess your credit situation when you apply for some services.

We might ask you for information about yourself and things like your employment details and credit history, and then seek a credit report from a credit reporting agency.

We'll always tell you before we seek a credit report, and we won't get one if you're under 18.

The credit report provided by a credit reporting agency may include information like your employment history, previous credit checks, any problems you've had paying bills and whether those issues were resolved. We use this information to assess whether we're entering into an arrangement that is sensible for both you and us.

After you become a member, we store the crucial bits of information from the credit report and our own credit assessment. We may continue to use this information to manage credit, and to make sure we're offering and providing the right services to you.



We don't use credit related information to generate marketing lists. We work with customer service partners inside and outside Australia on credit related matters. Where necessary, we give our partners access to the credit information they need to help manage credit and your services.

You can get access to credit related information we hold about you, ask us to correct it, or make a complaint, as described elsewhere in this policy. If we agree that our records need to be corrected, and we've previously disclosed that information to a credit reporting agency or other person, we'll tell them about the correction too.

You can ask the credit reporting agencies not to use or disclose the information in their files if you think you have been or are likely to become a victim of fraud.

Other Websites

Our Website will also contain links to third party websites. In visiting third party websites, the collection, use or disclosure of any personal information will not be subject to this Privacy Policy. We are not able to determine or control how a third party will use your personal information.

Disclosure

We may disclose your personal information to the following people/ organisations:

- **Essential service providers.** These are the companies that we rely on to provide Services to you. We may be required to provide your personal information to these companies to ensure that we can deliver services to you.
- **Law enforcement or government bodies.** There are exceptions under the *Privacy Act* with regards to the provision of personal information to law enforcement or government bodies. When a legitimate request is sent to us by a law enforcement or government body we will comply with that request and may provide personal information about you without your consent.
- **Companies related to us or who take control or part or all of our business.** In providing personal information to us, you will need to be aware of the possibility that, in future, another company may take control of part or all of our business. In that case, your personal information will be provided to that company.
- **Companies not related to us who we enter into contracts with to help to deliver services to you.** In providing personal information to us, you will need to be aware of the possibility that, in future, personal information held by us may be given to another organisation. In that case, your personal information will be provided to that organisation and we use reasonable endeavours to ensure that those organisations protect your personal information.



Security

We're committed to protecting your personal information.

Some of the security measures we may use include:

- Firewalls and access logging tools that protect against unauthorised access to your data and our network.
- Secure work environments and workflow systems that prevent unauthorised access and copying of your personal information.
- Secure server and closed network environments.
- Encryption of data in transit.
- Virus scanning tools.
- Management of access privileges, to ensure that only those who really need it can see your personal information.
- Ongoing training and security reviews.

These measures are robust, but security risks do change. We will remain vigilant in our efforts to protect your personal information.

Access and correction: personal data

You can request access to the personal information that we hold about you by contacting us. We will endeavour to provide a written response to you within 5 business days. If any changes are required, we take reasonable steps to correct the information so that it is accurate, complete and up to date.

Complaints

If you are concerned about how we have dealt with your personal information you should first contact us. We will endeavour to send you a written response within 5 business days.

If you are not satisfied with the way we have dealt with your complaint, you may then complain to the Federal Privacy Commissioner:

Officer of the Federal Privacy Commissioner
133 Castlereagh Street
Sydney NSW 2000
02 9284 9800
www.privacy.gov.au



Contact Us

You may contact us using the following details:

ADDRESS: Attention to the CEO
Australian Packaging Covenant Organisation Ltd.
Level 4, 332 Kent Street
Sydney NSW 2000

PHONE: (02) 8381 3700

EMAIL: apc@packagingcovenant.org.au

WEBSITE: www.packagingcovenant.org.au

Version Control

Version	Amendment	Author and date
Version 1	Draft	KG 29.06.2016
Version 23032017	References to "NPCIA" replaced with "APCO". Contact details updated.	KG 23.03.2017