



Winthrop Australia  
ABN 74 043 852 709  
Hackett Entrance #2 Level 1, Guild Commercial Centre  
Crawley, West Australia 6009  
Ph (08) 6488 2777 Fax: (08) 6488 1049  
<http://www.winaust.com.au>

---

## WINTHROP AUSTRALIA PRIVACY POLICY

Effective: 12 March 2014

Winthrop Australia Pty Ltd (ABN 74 043 852 709) (“Winthrop Australia,” “we,” “us,” “our”) acknowledge the importance of privacy to our customers, and we strive to be clear about how we collect, use, disclose, transfer and store your personal information. This Privacy Policy provides an overview of our information practices. The Privacy Policy applies to any personal information you provide to us or we otherwise collect (collectively, our “Services”).

The Privacy Act 1988 (Cth) (the “Privacy Act”) applies to Winthrop Australia’s collection, use and disclosure of your personal information as well as other applicable laws protecting privacy. Where appropriate, Winthrop will handle personal information relying on the employee records exemption and the related bodies corporate exemption in the Privacy Act. While this Privacy Policy applies to all our Services, additional consents may be obtained for specific services or certain uses or disclosures of your information.

If you receive a product or service from one of our affiliates or your information is otherwise collected by one of our affiliates, that affiliate may have a separate privacy policy. You should refer to that privacy policy for further details about how the affiliate may collect, process, use, store and disclose your information.

This Privacy Policy should be read in conjunction with, and is subject to: (i) any other privacy or collection statement that Winthrop may provide to you when it collects your personal information or provides a particular Service; and (ii) any terms and conditions of use which govern your access to and use of each of our Services.

The Privacy Policy applies regardless of whether you use a computer, mobile phone, tablet, or other device to access our Services or provide information to us. It is important that you read the Privacy Policy carefully because anytime you use our Services, you consent to the practices we describe in the Privacy Policy. If you do not agree to the practices described in the Privacy Policy, you should not use our Services.

It also is important that you regularly check for updates to the Privacy Policy. If we update the Privacy Policy and you use our Services after the update, the new practice(s) identified in the update will apply to your use of the Services, although in certain cases we also may let you know about changes we consider to be material by placing a notice on relevant Services. The most current version of the Privacy Policy will always be available here <http://www.cdmaust.com.au/grouphome/about/Privacy.html>

## **Information We Collect**

We collect various types of information in connection with the Services, including:

- 1 Information you provide directly to us;
- 2 Information we collect about your use of our Services; and
- 3 Information we obtain from third-party sources.

### **What information do we collect about you and why?**

We collect, hold, use and disclose your personal information for the purpose of providing Services and information to you, for our business operations and for other purposes set out in this Privacy Policy. You can choose not to provide us with certain types of information, but if you do so we may not be able to provide you with certain Services or it may affect your ability to use or receive some Services.

#### *1 Information you provide directly*

We may collect information directly from you:

- **To provide and improve our products and services**—subject to the direct marketing section below, we may also use your information for marketing purposes. We may sometimes also collect personal information for assessment and analysis of our market, customers and Services, to enable us to monitor, review and improve the Services which we offer and for internal record keeping.
- **For surveys, promotions or competitions**—we may collect information from you in customer surveys, prize draws, competitions or promotions. We may also use this information to monitor or improve customer satisfaction and (subject to the direct marketing section below) for marketing purposes.
- **To assist with your queries**—you may also choose to provide us with your name or other contact details when you call us by phone, write to us or email us, so that we can respond to your query and send you information about our products and services.
- **When you use our websites**—in general, you can use parts of our websites without giving us any information, unless you are interacting with us for purposes such as those described above. On certain pages of our websites, for example registration pages, we will request information about you. We will only be able to provide you with our full website environment and services if you have completed and submitted the information required for the registration process and this is accepted by us in accordance with the relevant website terms and conditions. If you send information to any bulletin board, forum or newsgroup that may be available on our websites, please remember that any information you provide will become public, and exercise caution in disclosing it. Please read also the section below about the use of cookies, beacons and similar technologies on our websites.
- **As part of our general business operations and administration**—Winthrop also collects personal information in relation to its general business operations and administration. This may include information about individuals who are, or are employed by, our suppliers (including service providers), contractors, dealers, related companies, agents, advisors, corporate customers and business partners.
- **For employment and contracting**—when you apply for a job or contract with us or otherwise do business with us, we may collect certain information from you, from any recruitment consultant and from your previous employers and others who may be able to provide information to assist us in our decision on whether or not to make you an offer of employment, engage you under a contract or otherwise do business with you. If you are made, and accept, an offer of employment with us, this Privacy Policy will not apply to our acts and practices in relation to employee records about you as a current or former employee to the extent those records are exempt from the operation of the Privacy Act.

## 2 *Information about your use of the Services*

In addition to the information you provide, we may collect information about your use of our Services through software on your device and other means. For example, we may collect:

- **Device and online information**—such as your hardware model, IMEI number and other unique device identifiers, MAC address, IP address, operating system version, and settings of the device you use to access the Services.
- **Log information**—such as the time and duration of your use of the Service, search query terms you enter through the Services, and any information stored in cookies that we have set on your device.
- **As part of our general business operations and administration**—WINTHROP also collects personal information in relation to its general business operations and administration. This may include information about individuals who are, or are employed by, our suppliers (including service and content providers), contractors, dealers, related companies, agents, advisors, corporate customers and business partners.

## 3 *Information from third-party sources*

We may receive information about you from publicly and commercially available sources (as permitted by law), which we may combine with other information we receive from or about you. We may collect information about you from our suppliers (including repair centres, resellers, service providers, content providers and retail stores) who collect your personal information on our behalf for the purposes set out in this Privacy Policy. We also may receive information about you from third-party social networking services when you choose to connect with those services.

### **Use and Sharing of Information**

We use the information we collect (and may combine it with other information about you) to, among other things Provide the Services you request.

We also use the information we collect in ways described to you in this Privacy Policy and any applicable terms and conditions or collection statements. We may share your information with the recipients referred to in this Privacy Policy, including:

- Affiliates—CDM family of companies.
- Service providers and suppliers— including companies that provide services to, for, or on behalf of Winthrop.
- Law enforcement—when we are required to do so or to protect Winthrop and its users.

### **How do we use your information and why?**

We may use information we collect for the following purposes:

- to register you or your device for a Service;
- to provide a Service or feature you request and to operate our websites and online platforms;
- to assist with your queries;
- to maintain and develop our business systems, including for testing and upgrading purposes;
- for our general business operations and administration;
- to register you on our websites, to administer our website Services (including processing any searches or

requests for information about our Services), and to allow you to use those Services (e.g. blogs, open forums, location based services and discussion pages);

- for advertising, such as providing customised advertisements and sponsored content and sending you promotional communications;
- for assessment and analysis of our market, customers and Services (including asking you for your opinions on our Services and carrying out customer surveys);
- to understand the way people use our Services so that we can improve them and develop new products and services;
- to provide maintenance services for your device;
- to conduct customer surveys, competitions, prize draws or promotions, as permitted by law;
- as required or authorised by law; and
- otherwise with your consent.

We may combine all of the information we collect from you, regardless of how you access our Services, and use it for purposes consistent with this Privacy Policy. Where applicable, this means that information you provide in connection with one Service may be used by other Services for the purposes we describe in this Privacy Policy.

### **To whom do we disclose your information and why?**

For the purposes described in this Privacy Policy, we may disclose your personal information to the following entities:

- **Affiliates.** Your information may be shared among CDM affiliates. We may disclose your information to any company in the CDM group (which includes our affiliates and related companies, contractors to whom we have outsourced the provision of services to our customers).
- **Business Partners.** We also may share your information with trusted business partners. These entities may use your information to provide you with services you request, make predictions about your interests and may provide you with promotional materials, advertisements and other materials.
- **Service providers and suppliers.** We also may disclose your information to our service providers, suppliers, contractors, dealers, distributors, resellers, repair centers, agents, and business partners who help us deliver a Service to you or provide services for or on behalf of us, such as companies that help us with billing or that send emails on our behalf.
- **Our Professional Advisers.** We may disclose your information to professional advisors in the course of obtaining professional advice.
- **Other Parties When Required or Authorised by Law or as Necessary to Protect Our Services.** There may be instances when we disclose your information to other parties:
  - to comply with the law or respond to compulsory legal process (such as a search warrant or other court order);
  - to verify or enforce compliance with the policies governing our Services; and
  - to protect the rights, property, or safety of Winthrop, or any of our respective affiliates, business partners, or customers.
- **Other Parties in Connection With Corporate Transactions.** We may disclose your information to a third party as part of a merger or transfer, or in the event of a bankruptcy. We may disclose your personal information to anyone to whom our assets or business (or any part of it) is transferred.
- **Other Parties With Your Consent or At Your Direction.** In addition to the disclosures described in this Privacy Policy, we may share information about you with third parties when you consent to or request such sharing.

## **Your Choices**

We offer a variety of choices about how we use your information. You can make choices about whether to receive promotional communications from us by following the unsubscribe instructions included in the communication. In some cases, you may be able to make choices in specific Services or when we give you a collection statement.

## **Accessing and Correcting Your Information or Making a Complaint**

You may request access to your personal information we hold about you by contacting our Chief Financial Officer using the details set out in this Privacy Policy. If you think that any of the personal information we hold about you is not accurate, complete or up-to-date, you may also request that we correct that personal information by contacting our Chief Financial Officer. We will respond to any such request within a reasonable period. While we will endeavour to allow you to access and correct the personal information we have about you, sometimes that will not be possible, in which case we will notify you and give you the reasons why (except to the extent it would be unreasonable for us to do so). If you wish to make a complaint about our handling of your personal information, you may contact our Chief Financial Officer using the details set out in this Privacy Policy with your full name and contact details and a detailed description of your complaint. We will respond to you within a reasonable period of time to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint. If we are unable to resolve your complaint, we will inform you of the steps available to you in those circumstances.

## **What do we do to keep your information secure?**

We have put in place reasonable physical and technical measures to safeguard the information we collect in connection with the Services. However, please note that although we take reasonable steps to protect your information, no website, Internet transmission, computer system or wireless connection is completely secure.

## **Third-Party Links and Products on Our Services**

Our Services may link to third-party websites and services that are outside our control. We are not responsible for the security or privacy of any information collected by third-party websites or other services. You should exercise caution, and review the privacy statements applicable to the third-party websites and services you use. We also may make available to you certain products or services developed by third parties. Winthrop is not responsible for these third-party products or services.

## **Third Parties that Provide Content, Advertising or Functionality on Our Services**

- Certain third parties may serve advertising or keep track of which advertisements users see, how often they see those advertisements, and what users do in response to them; and
- We enable you to share certain materials on the Services with others through social networking services such as Facebook, Twitter, Google +, and LinkedIn.

These third-parties may collect or receive certain information about your use of the Services, including through the use of cookies, beacons, and similar technologies, and this information may be collected over time and combined with information collected across different websites and online services. Some of these companies participate in industry-developed programs designed to provide consumers choices about whether to receive targeted advertising.

If you connect with a social networking service, we may receive and store authentication information from that service to enable you to log in, as well as other information that you allow us to receive when you connect with these services.

Also, please note that if you choose to connect with a social networking service on a device used by people in addition to you, those other users may be able to see information stored or displayed in connection with your account on the social networking service(s) with which you connect.

### **Direct Marketing**

We may also use or disclose your personal information to provide you with information about products, promotions, special offers and other information which relates to our Services or which we believe may be of interest to you. We may send you such information by email, telephone, SMS text message and/or any other form of electronic messages, post, fax or smartphone applications, social networking websites or any other method which becomes relevant from time to time.

When you provide us with information about yourself, you will usually be given the option to let us know that you do not want that information to be used for direct marketing purposes. You can change your mind about your preferences in respect of direct marketing and make choices at any time by following the unsubscribe instructions included in the relevant communication, or by contacting our Chief Financial Officer.

### **Further information & Contact Details**

If you have any questions or wish to access or correct your personal information, make a complaint or change your preferences in respect of direct marketing, please contact our Chief Financial Officer at:

Attn: Chief Financial Officer  
Winthrop Australia  
PO Box 109, Osborne Park WA 6917

Email: [rays@cdmaust.com.au](mailto:rays@cdmaust.com.au)

Telephone: (08) 9202 4444