

Enable Services Pty Ltd

ACN 605 614 051 ABN 92 605 614 051



Enable 2 Drive POLICIES

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Privacy Policy



Last reviewed and updated: 17 April 2017

Enable 2 Drive (E2D) is committed to maintaining and protecting the privacy of our customers, staff and other individuals. We will not interfere with a person's privacy unless it is directly related to the provision of goods and services, or there is a legal requirement to do so.

We will publish a statement outlining our privacy policy on our website.

We use third parties to provide customers with the best service possible. We use third parties to equip staff with the best tools possible. To that end we may share an individual's details with a third party. These third parties are prohibited from using personally identifiable information for any other purpose.

The privacy policies of third parties we use can be found on their websites. We will review and monitor these policies to ensure they meet the requirements of legislation and the expectations of our customers and staff.

- Timely app.gettimely.com/public/privacy
- Xero www.xero.com/au/about/privacy
- eWay www.eway.com.au/legal#privacy
- Google privacy.google.com

When sensitive information (such as credit card numbers) is entered on our website, we will encrypt that information using secure socket layer technology (SSL). When credit card details are collected, we will pass them on in order to be processed as required. We never permanently store complete credit card details. We will follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it.

We will not record, collect, use or disclose Tax File Number (TFN) information unless this is permitted under taxation, personal assistance or superannuation law. When we request an individual's TFN we will tell the individual the name of the law (or laws) that authorises them to collect the TFN, the purpose for which the TFN is collected, that it is not an offence to refuse to provide a TFN and the consequences of refusing to provide a TFN.

We will not sell personal details to anyone. We will not hold or pass on personal information that came into our possession accidentally or illegally.

Individuals can correct, update, delete or deactivate personal information stored by us by contacting us in writing or by email.

Definitions

The *Privacy Act 1988* regulates how personal information is handled. The *Act* defines personal information as:

...information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

Common examples of 'personal information' are an individual's name, signature, address, telephone number, date of birth, medical records, bank account details and opinion about a person.

The *Act* includes thirteen Australian Privacy Principles (APPs), which do not apply to **Enable 2 Drive**. However, in pursuit of best practice, we will endeavour to comply with these Principles.

Part IIIA of the *Act* regulates consumer credit reporting in Australia. Part IIIA is supported by the *Privacy Regulation 2013* and the Privacy (Credit Reporting) Code 2014 (CR code).

Responsibilities

Director	Responsible for the development and continued improvement of the Privacy Policy. Responsible for company-wide compliance to this policy.
Manager	Responsible for day-to-day compliance to this policy.
Manager	Responsible for training staff in this policy.
Employees	Responsible for ensuring access to personal information is not available to others, without the permission of the person, for example <ul style="list-style-type: none">• by not disclosing information to a third party,• by not giving their passwords to anyone, and• by showing care when information is being displayed on a screen.
Employees	Responsible for ensuring that customers are only contacted in order to deliver the services E2D offers, including via email, SMS, FaceBook and other means.
Employees	Responsible for reporting a breach of privacy to their supervisor.
Driver Trainers	Responsible for ensuring documents containing personal information are kept secure, and are submitted to the office for filing at the first available opportunity.

Relevant Laws and Regulations

Commonwealth

Title: *Privacy Act 1988* (Current as at 1 Jul 2016)
Australian Privacy Principles
Privacy business resource 12: The Privacy (Tax File Number) Rule 2015

Purpose: Eight parts to the purpose of this Act:

1. to promote the protection of the privacy of individuals; and
2. to recognise that the protection of the privacy of individuals is balanced with the interests of entities in carrying out their functions or activities; and
3. to provide the basis for nationally consistent regulation of privacy and the handling of personal information; and
4. to promote responsible and transparent handling of personal information by entities; and
5. to facilitate an efficient credit reporting system while ensuring that the privacy of individuals is respected; and
6. to facilitate the free flow of information across national borders while ensuring that the privacy of individuals is respected; and
7. to provide a means for individuals to complain about an alleged interference with their privacy; and
8. to implement Australia's international obligation in relation to privacy.

Regulatory Body: Office of the Australian Information Commissioner

Website: <http://www.oaic.gov.au/>

Title: *Spam Act 2003* (as of 1 July 2005)

Purpose: Prohibits spam and lays out the rules for legitimate commercial electronic messages. The *Act* defines spam as “unsolicited commercial electronic messaging”.

To be considered spam the messages must be (1) commercial in nature, and (2) sent without the prior permission of the person receiving the message.

All commercial messages must also identify who is responsible for the sending of the message and provide an easy way to unsubscribe from messages.

Regulatory Body: Australian Communications and Media Authority

Website: <http://www.acma.gov.au>

Associated Policies, Procedures and Documents

The following documents are associated with this policy

- How we respect your privacy (... Policies and Procedures\Policies (MASTER))
- Privacy Policy (www.enable2drive.com.au)