



**BEO-EXPORT®**

# Privacy Policy

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## **BEO-Export Australia Pty Limited**

ABN 55 074 232 830 ☐ AFS Licence Number: 294171

68 Moore St ☐ PO Box 932  
Liverpool NSW 2170 ☐ Liverpool BC NSW 1871  
Australia ☐ Australia

Tel: 02 9822 4979 ☐ Fax: 02 9822 5429  
www.beoexport.com ☐ info@beoexport.com

# Privacy Policy

This Policy applies to Beo-Export Australia Pty Ltd (ACN 074 232 830), Beo-Travel Pty Ltd (103 078 342), Beo-Finance Pty Ltd (ACN 109 603 483) (referred to as "BEO", "we", "our", "us") and extends to and covers all operations and functions of the group of companies.

The word "individual" refers to a customer, client, or any other person with whom we come into contact. All contractors, sub-contractors, vendors, service providers, customers, agents or any other third parties that have access to and/or utilise personal information collected and/or held by BEO must abide by this Privacy Policy.

"Personal information" is information or an opinion relating to an individual, which can be used to identify that individual. Some personal information, which we collect, is 'sensitive information'. Sensitive information includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, that is also personal information, and also includes health information about an individual.

"Sensitive information" means personal information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, that is also personal information, and also includes financial details about an individual, including his bank account details and credit history.

At BEO, we are committed to ensuring the confidentiality and security of the personal information supplied by individuals. BEO is bound by the National Privacy Principles ('NPPs') contained in the *Privacy Act 1988* (C'th) (*Privacy Act*).

## 1. How we collect personal information

We may collect sensitive information about an individual's financial details such as his/her bank account details, and credit history. We generally collect personal and/or sensitive information from the individual by the following methods:

- 1.1 directly from applications, questionnaires and/or forms completed by individuals who wish to use our services or to apply for a position in our organisation;
- 1.2 from information disclosed to us by an individual on the phone, or by sending us correspondence (by letter, fax or email) or contact us in person;
- 1.3 by clickstream on our websites [www.beo.com.au](http://www.beo.com.au), [www.beoexport.com](http://www.beoexport.com), [www.beoexport.com.au](http://www.beoexport.com.au), [www.beotravel.com](http://www.beotravel.com), [www.beotravel.com.au](http://www.beotravel.com.au) and [www.beofinance.com.au](http://www.beofinance.com.au); and
- 1.4 from a variety of third party sources, including our business contacts and financial institutions.

The above list is not exhaustive.

In some circumstances BEO may be provided with personal information about an individual from somebody else, for example a referral from another person. BEO will take reasonable steps to inform the individual that it holds the personal information and the purpose for which it holds the personal information.

BEO must not collect sensitive information unless the individual has consented, or it is required by law - or in other special specified circumstances.

Typically, the type of personal information we collect about the individual includes his or her name, age, date of birth, occupation, mailing address, phone numbers, email address and other information that is relevant to the services we provide. The personal information may also include information about the form of identification used in relation to an individual to send or receive a transaction (required by law in some instances), and information about a transaction in relation to an individual, including details of the amounts paid in or out of an individual's account as well as delivery instructions.

If the personal information we request is not provided, we may not be able to process an individual's application to transfer funds as requested, or provide individuals with the benefit of our services, or meet an individual's needs appropriately.

## **2. Why do we collect personal information?**

BEO collects personal information for the following purposes:

- to conduct our business of facilitating the transfer of money both into and out of Australia;
- to enter into contracts with sub-contractors to conduct our business;
- to assess applications by individuals to provide them with our services;
- to comply with our legal obligations; and
- to help us manage and enhance our services.

## **3. About whom do we collect personal information?**

The type of information we may collect and hold includes (but is not limited to) personal information about:

- individuals;
- third parties;
- prospective employees; and
- other people with whom we come into contact.

## **4. Website Collection**

4.1 BEO collects personal information from the web sites [www.beo.com.au](http://www.beo.com.au), [www.beoexport.com](http://www.beoexport.com), [www.beoexport.com.au](http://www.beoexport.com.au), [www.beotravel.com](http://www.beotravel.com), [www.beotravel.com.au](http://www.beotravel.com.au) and [www.beofinance.com.au](http://www.beofinance.com.au). ("the Websites") through receiving subscription applications and emails. We may also use third parties to analyse traffic at that web site. Information collected through such analysis is anonymous.

4.2 The Websites utilise cookies, which provide a means whereby an individual may provide personal information about themselves which can be accessed by third parties. This might be personal information which the individual has supplied about themselves, their preferences or their requirements. Cookies can be disabled at the request of the individual.

4.3 The personal information which is entered on the Websites is encrypted by BEO. This means that an individual's personal information cannot be accessed by anyone else using the Websites. The encryption process enables all data sent to and from the Websites to be "scrambled" and "reassembled" when transferred to our servers from the computer from which the personal information was entered, in order to protect the security of an individual's personal information.

## **5. How might we use and disclose personal information?**

When we refer to "use" of personal information, we mean use within our organisation, for the purposes outlined above. When we use the word "disclose" we mean providing the information to persons outside our organisation.

BEO may use and disclose personal information for the primary purposes for which it is collected, for reasonably expected secondary purposes which are related to the primary purpose and in other circumstances authorised by the *Privacy Act*. Sensitive information will be used and disclosed only for the purpose for which it

was provided or a directly related secondary purpose, unless the individual agrees otherwise, or where certain other limited circumstances apply (eg, where required by law).

We may use and disclose personal information for the following purposes:

- to conduct our business of facilitating the transfer of money both into and out of Australia;
- to enter into contracts with sub-contractors to conduct our business;
- to assess applications by individuals to provide them with our services;
- to comply with our legal obligations;
- to communicate with individuals, by providing them from time to time with information contained in newsletters, emails or brochures;
- to comply with our legal obligations; and
- to help us manage and enhance our services.

We do not disclose personal information we collect to others for the purpose of allowing them to direct market their products and services. We do not use or disclose sensitive information for direct marketing purposes.

We may engage other people to perform services for us, which involves that person handling personal information we hold. In these situations, we prohibit that person from using personal information about individuals except for the specific purpose for which we supply it.

In relation to sensitive information held by us about an individual's financial history, credit worthiness or bank account details, wherever possible, BEO will attempt to de-identify the information. We also undertake to delete all personal information about an individual when it is no longer needed or relevant.

We may disclose personal and/or sensitive information to:

- third parties;
- consultants we engage to assist individuals;
- organisations involved in a transfer or sale of all or part of our assets or business (including accounts and trade receivables);
- organisations involved in managing our corporate risk and funding functions (eg securitisation);
- regulatory authorities, if required by law; and
- anyone else to whom the individual authorises us to disclose it.

We also collect personal and/or sensitive information from these organisations and individuals, and deal with that information in accordance with this Policy.

## **7. Sending information overseas**

We will not send personal or sensitive information to recipients outside of Australia without: obtaining the individual's consent (in some cases this consent will be implied); or otherwise complying with the NPPs.

We will not send personal or sensitive information to recipients in a foreign country that is not subject to an information privacy scheme similar to the *Privacy Act*, without the consent of the individual.

## **8. Management of personal information**

The NPPs require us to take all reasonable steps to protect the security of personal information. BEO personnel are required to respect the confidentiality of personal information and the privacy of individuals.

BEO takes reasonable steps to protect personal information held from misuse and loss and from unauthorised access, modification or disclosure, for example by use of physical security and restricted access to electronic records. Where we no longer require the personal information for a permitted purpose under the NPPs, we will take reasonable steps to destroy it.

## **9. Identifiers**

We will not use identifiers assigned by the Government, such as a tax file number, medicare number or provider number, for our own file recording purposes.

#### **10. How do we keep personal information accurate and up-to-date?**

BEO takes reasonable steps to ensure that the personal information it holds is accurate, complete and up-to-date. We encourage individuals to contact us in order to update any personal information we hold about them. Our contact details are set out below.

BEO-Export Australia Pty Ltd  
PO Box 932  
Liverpool BC NSW 1871

#### **11. Access to personal information**

Subject to the exceptions set out in the *Privacy Act*, individuals may gain access to the personal information, which BEO holds about them by contacting the BEO Privacy Officer, Vaso Despotovic. If we refuse to provide the information, we will provide reasons for the refusal and inform the individual of any exceptions relied upon under the *Privacy Act*.

We will require identity verification and also require the individual to specify what information is required. An administrative fee for search and photocopying costs may be charged for providing access. We will advise the likely cost in advance.

#### **12. Updates to this Policy**

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment.

#### **13. Responsibilities**

It is the responsibility of management to inform employees and other relevant parties that Privacy Policy is maintained and enforced. Management must ensure that they periodically advise BEO's employees and other relevant parties of any changes or any new Privacy Policies in a timely manner. It is the responsibility of all employees and other relevant parties to ensure that they understand and adhere to this Privacy Policy. Ignorance of the existence of the Privacy Policy will not be an acceptable excuse for non-compliance.

#### **14. Privacy Training**

All new employees must be provided with timely and appropriate access to BEO's Privacy Policy. All employees must be provided with opportunities to attend appropriate and periodic Privacy awareness training and must ensure that they understand the Privacy related issues that could adversely affect BEO's position if not properly adhered to.

#### **15. Non-compliance & disciplinary actions**

Any BEO employee or relevant third party that identifies, knows about or suspects a Privacy breach must immediately report the matter to the Privacy Officer. Employees or other relevant parties that contravene or do not comply with BEO's Privacy Policy may be subject to disciplinary action.

#### **16. Incidents/Complaints Handling**

If an individual has a privacy complaint, they are required to send it in writing to the Privacy Officer.

BEO has an effective incidents/complaints handling process in place to manage privacy risks and issues. The incidents/complaints handling process involves:

- identifying (and addressing) any systemic/ongoing compliance problems;
- increasing consumer confidence in BEO's privacy procedures; and
- helping to build and preserve BEO's reputation and business.

#### **17. Contractual arrangements with third parties**

BEO must ensure that all contractual arrangements with third parties adequately address privacy issues.

Each third party is aware of and understands this Privacy Policy, and has implemented policies in relation to the management of personal information in accordance with the *Privacy Act*, including:

- regulating the collection, use and disclosure of personal information;
- de-identifying personal information wherever possible;
- ensuring that personal information is kept securely, protected from loss or misuse, with access to it only by authorised employees or agents of the related organisations; and
- ensuring that personal information is only disclosed to organisations which are approved by BEO.

The third parties specifically agree only to use personal information for the purposes consented to by BEO or by the individual concerned.

#### **18. Privacy Audits**

BEO conducts periodic privacy audits in order to ascertain:

- what sort of personal and/or sensitive information is collected and held;
- how that information is collected;
- what the reasons are for collection of that information;
- where and how that information is stored;
- how that information is secured;
- who has access to that information;
- whether that information is shared with anyone;
- whether the intended use of collection is communicated; and
- whether that information is current and necessary.

#### **19. Enquiries**

If you have any questions about privacy-related issues please contact the BEO Privacy Officer:

Vaso Despotovic  
Privacy Officer  
Telephone: 02 9822 4979  
Fax: 02 9822 4123  
Office: 68 Moore Street  
Liverpool NSW 2170 AUSTRALIA