

1. Your right to privacy?

TITAN CONTAINERS NZ LIMITED (5625006), of 23 Boardmans Close Beresfield 2322, trading as **TITAN CONTAINERS AUSTRALIA (ABN 99 131 959 059)** (hereafter "**TITAN**") respects your right to privacy and will take all reasonable steps to protect personal information disclosed to TITAN in accordance with the *Privacy Act 1988* (Cth) ("**Privacy Act**").

The purpose of this Privacy Notice is to inform you how we collect and treat your personal information.

For the purpose of this Privacy Notice, "**personal information**" means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

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

2. Collection of personal information

TITAN will, from time to time, collect and store personal information in a variety of ways, including (but not limited to): when you disclose the personal information to us, when you interact with us electronically or in person, when you access our website, when we engage in business with you (including sale and receipt of products and services), or when personal information is provided to us by third parties.

TITAN may collect and store personal information, such as (but not limited to):

- (a) name;
- (b) date of birth;
- (c) details of identification documents (i.e. driver's licence and/or passport number)
- (d) postal address;
- (e) email address;
- (f) telephone number and/or facsimile number;
- (g) banking details and/or credit card details;
- (h) CCTV footage and/or audio; and
- (i) any other information reasonable necessary.

By providing us with information, you consent to the collection, storage and use of that information subject to the terms of this Privacy Notice.

If you withhold your personal information, it may not be possible for us to interact or engage in business with you.

3. Use of personal information

You hereby consent to us using your personal information to:

- (a) provide you with products and services;
- (b) provide you with information regarding products and services;
- (c) administer our business;
- (d) fulfil any State or Commonwealth bodies' requests for information or reporting;
- (e) manage, research and develop our products and services;
- (f) communicate with you by a variety of measures including (but not limited to): telephone, email, sms or mail; and
- (g) investigate any complaints.

4. Disclosure of personal information

TITAN may disclose your personal information to any employees, officers, insurers, professional advisers, agents, suppliers or subcontractors of TITAN or any of its related bodies corporate (as defined in the *Corporations Act 2001* (Cth), insofar as reasonably necessary for the purposes set out in this Privacy Notice.

TITAN may need to disclose your information to others outside our business, including services providers, law enforcement agencies, government agencies and departments, debt collection agencies, storer screening databases and others.

If we do disclose your personal information to a third party, we will take all reasonable steps to protect it in accordance with this Privacy Notice.

We may disclose your personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, legal proceedings or in response to a law enforcement agency request.

5. StorerCheck Database

TITAN may also collect and use your personal information for credit and risk management purposes, including to enable us to use and contribute to the Self Storage Association of Australasia's (**SSAA**) internal credit and behaviour database (the **StorerCheck Database**). Your personal information, including the details of your government-issued identifying documents, may be disclosed on, and shared with SSAA members accessing, the StorerCheck Database. Some SSAA members reside in New Zealand, so your personal information may be disclosed to recipients in New Zealand.

Your personal information will be stored on the StorerCheck Database until the later of the date on which we, SSAA, or another SSAA member no longer needs your personal information, or the date that is 5 years after you cease using the services of a SSAA member.

6. Storage and security of personal information

We are committed to ensuring that the personal information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

7. Access to personal information

You may request details of personal information that we hold about you in accordance with the Privacy Act.

We reserve the right to refuse to provide you with personal information that we hold about you, in certain circumstances set out in the Privacy Act or any other applicable law.

It is important that the personal information we hold about you is accurate, complete and up-to-date in order to effectively engage you in business. If you find that personal information we hold about you is incorrect, inaccurate, out-of-date, incomplete, irrelevant or misleading, you can ask us to correct it by contacting us.

8. Direct marketing

We may deliver direct marketing communications to you about our products and services and any other products or services you might be interested in. If you notify us that you do not want to receive these communications, we will comply with your instruction and will not use your personal information for such purposes.

Subject to any other term of this Privacy Notice, we will only use or disclose your personal information for the purposes of direct marketing if:

- (a) Where we collected the information from you:
 - it is reasonable in the circumstances to expect that we would use or disclose the information for direct marketing purposes;

- we provide you with a simple means to 'opt-out' of direct marketing communications from us; and
 - you have not elected to 'opt-out' from receiving such direct marketing communications from us.
- (b) Where we collected the information from a third party:
- you have consent to use or disclosure of your personal information for direct marketing purpose, or it is impracticable to obtain that consent; and
 - we provide you with a simple means to 'opt-out' of direct marketing communications from us; and
 - you have not elected to 'opt-out' from receiving such direct marketing communications from us.

You may opt-out of receiving direct marketing communications by:

- (a) checking the relevant box on the form used to collect your personal information;
- (b) clicking a link on the email communication sent to you; or
- (c) contacting us using our contact details set out at section 17.

9. General Data Protection Regulation (GDPR) for the European Union (EU)

If you are an individual residing in the EU, TITAN will comply with the principles of data protection set out in the GDPR for the purpose of fairness, transparency and lawful data collection and use. TITAN agrees to the following:

- (a) We process your personal information as a 'Processor' and/or to the extent that we are a 'Controller' as defined in the GDPR.
- (b) We must establish a lawful basis for processing your personal information. The legal basis for which we collect your personal information depends on the data that we collect and how we use it.
- (c) We will only collect your personal information with your express consent for a specific purpose and any data collected will be to the extent necessary and not excessive for its purpose. We will keep your data safe and secure.
- (d) We will also process your personal information if it is necessary for our legitimate interests, or to fulfil a contractual or legal obligation.
- (e) We process your personal information if it is necessary to protect your life or in a medical situation, it is necessary to carry out a public function, a task of public interest or if the function has a clear basis in law.
- (f) We do not collect or process any personal information from you that is considered 'Sensitive Personal Information' under the GDPR, such as personal information relating to your sexual orientation or ethnic origin unless we have obtained your explicit consent, or if it is being collected subject to and in accordance with the GDPR.

10. Your rights under the GDPR

If you are an individual residing in the EU, you have certain rights as to how your personal information is obtained and used. TITAN complies with your rights under the GDPR as to how your personal information is used and controlled if you are an individual residing in the EU.

If you are an individual residing in the EU, you have the following rights:

- (a) to be informed how your personal information is being used;
- (b) to access your personal information (we will provide you with a free copy of it);
- (c) to correct your personal information if it is inaccurate or incomplete;
- (d) to delete your personal information (also known as "the right to be forgotten");
- (e) to restrict processing of your personal information;
- (f) to retain and reuse your personal information for your own purposes;
- (g) to object to your personal information being used; and

(h) to object against automated decision making and profiling, except as otherwise provided in the GDPR.

Please contact us at any time to exercise your rights under the GDPR using the contact details provided in this Privacy Notice. We may ask you to verify your identity before acting on any of your requests.

11. Hosting and International Data Transfers

We and our other group companies may have offices, facilities and/or operations in various locations around the world and may host data in those countries. Personal information that we collect may from time to time be stored, processed in or transferred between parties or sites located in those countries.

If your personal information is disclosed to a recipient overseas, we will do so in compliance with this Privacy Notice. Transfer of your personal information will be protected by appropriate safeguards, including to the extent required by GDPR. We will take all reasonable steps to ensure that any recipient of the personal information will comply with the requirements of the Privacy Act. You hereby consent to the transfer of your personal information outside of Australia in accordance with this clause.

Where we employ data processors to process personal information on our behalf, we only do so on the basis that such data processors comply with the requirements under applicable privacy laws (including Privacy Act 1988 (Cth) and the GDPR) and that have adequate technical measures in place to protect personal information against unauthorised use, loss and theft.

12. Use of website

When you come to our website, we may collect certain non-personal information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

We use information from cookies to monitor usage of the website, identify returning users, enable targeted services and opportunities to be directly marketed to you based on your browsing history. Cookies are uniquely numbered identification numbers like tags which are placed on individuals' browsers. Cookies are necessary for TITAN to create a better user experience on its websites. You can delete cookies and change the settings on your web browser not to accept cookies, however, certain features and content may not be available to you.

You can read more about the use of cookies in our Cookie Policy, which you can find at the following link: <https://titancontainers.com/ql/about-us/privacy>

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that TITAN is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

13. Minors

Services provided by TITAN are not directed to persons under the age of 18 years old. We do not knowingly collect personal information online from children under 18 years of age. A parent or guardian of a child under the age of 18 that believed the child has provided us with personal information without their consent as required by law should contact us. If we become aware that a child under the age of 18 has provided us with personal information, we will delete such information.

14. Changes to Privacy Notice

We may modify this Privacy Notice at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website. Please check back from time to time to review our Privacy Notice.

15. Complaints about privacy

If you have any complaints about our privacy practices, please feel free contact us. We take complaints very seriously and will respond shortly after receiving written notice of your complaint. Our contact detail is provided below.

16. Notifiable Data Breaches Scheme

TITAN will notify individuals whose personal information is involved in a data breach that is likely to result in serious harm. This notification will include recommendations about the steps individuals should take in response to the breach. The Australian Information Commissioner will also be notified of such data breaches.

If you believe there has been a data breach, you should contact us as soon as possible.

17. Contact details

Further information can be obtained by contacting	Privacy Officer - TITAN Containers Australia PO Box 403 Beresfield NSW 2322 1300 484 826 privacy@titancontainers.com.au
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