

## Windia Pty Ltd is the holding company of RBA Australia.

ABN 88 003 672 231

Windia Pty Ltd trading as **RBA Australia** is a market leader in commercial bathroom and plumbing services and is committed to providing quality products and services to you. In order to carry out our business we need access to a wide range of “personal information”.

Outlined below is our privacy policy which explains our ongoing obligations to you in respect of how we handle and manage your Personal Information and how we comply with our obligations in relation to personal information under the Australian Privacy Principles [APPs] contained in the **Privacy Act 1988** [Cth] [the **Privacy Act**].

This privacy policy is published on our website [www.rba.com.au](http://www.rba.com.au) or such other website owned and operated by us [Site]. We may update this privacy policy from time to time and if we do, we will post the updated version on our Site.

Our privacy policy deals with the manner in which:

- We collect, use and disclose personal information;
- We store, share, secure and dispose of personal information;
- Access can be granted to personal information; and
- We deal with any complaints concerning privacy.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.aoic.gov.au](http://www.aoic.gov.au).

**Note:** Please carefully read this privacy policy and contact us if you have any questions.

### Your Personal Information

Personal Information is information or an opinion [including information or an opinion forming part of a database] about an identified individual, or an individual who is reasonably identifiable, irrespective of whether that information or opinion is true or not; or recorded in a material form or not [**Personal Information**].

Personal Information that we may collect and hold may include:

- **Identification information** - including name, address, contact details [including telephone numbers and email addresses], age, gender, date of birth and drivers licence number;
- **Financial information** - credit card details, bank account details and other financial information required for the operation of our business.

## Collection of your Personal Information

We will only collect your Personal Information by lawful and fair means. We collect Personal Information in a number of ways including:

- Directly from you, for example when you provide information by correspondence, telephone, email, or when you submit personal information through websites or an application form;
- When you visit our Site and from cookies [see below];
- From media and publications and other publicly available sources;
- From our own records;
- When we are legally required to do so; and
- From third parties such as related companies, credit reporting agencies or your representatives.

We receive Personal Information from various sources including extraction of website information. When you visit our Site, a record of your visit is made. For the purpose of analysing and evaluating the performance and operation of our Site, the following information is logged:

- Your Internet Protocol [IP] address and device used to access the Site;
- Date and time of your visit to the Site and the physical location from where you access the Site;
- Pages you accessed and documents downloaded;
- Previous website you have visited;
- Type of browser you are using.

We use your IP address to help diagnose server issues with our Site. We also analyse our Site logs to improve the relevance and presentation of content on the Site. While these logs may be IP identifiable, no attempt is made by us to link them with any individuals that browse the Site.

The Site uses cookies that are small text files that are placed on your computer by webpage servers. The purpose of cookies is to help analyse web traffic and let the website know when you visit a particular website, which pages you visit and how long you visit them for. Cookies can also record information about your visit to a website, allowing it to remember you the next time you visit the website.

The Site may contain links to other websites. We are not responsible for the information handling practices or contents of these third party or external websites.

## Using and disclosing your Personal Information

We collect your Personal Information for the primary purpose of providing our services to you, and for purposes which are ancillary to the primary purpose of which we collect it and where such use or disclosure would reasonably be expected by you.

Therefore, we may use and disclose your Personal Information to:

- Verify your identity;
- Action any orders placed by you;
- Assist in connection with the provision of services or products you require;
- Inform you of new products or services;
- Register you for any customer reward scheme operated by us;
- Carrying out administrative services such as invoicing and the collection of debts;
- Where appropriate, conduct checks in relation to credit worthiness with credit reporting agencies;
- Consider any complaints or adverse event reports;
- For research and development and improvement of our services and products;
- Assist us to comply with any legal regulatory obligations such as product recalls, product safety notifications; and
- Unless you tell us otherwise we may use your Personal Information to mail out special promotions, newsletters and other marketing material. We will not email or SMS marketing material unless you have consented to this.

You may unsubscribe from our e-newsletter, mailing/marketing lists or other electronic publications at any time by contacting us in writing or by clicking the unsubscribe link at the bottom of digital correspondence.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

## Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record, or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained;
- For a secondary purpose that is directly related to the primary purpose;
- With your consent; or
- Where required or authorised by law.

## Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

## Disclosure of Personal Information

We may disclose your Personal Information in a number of circumstances to:

- Our related companies and professional advisors;
- Contractors, suppliers and agents who assist us with our process and operation of our business;
- Third parties where you consent to the use or disclosure; and
- Government, regulatory bodies and other organisations as required or authorised by law.

We may be required to disclose your Personal Information without your consent when disclosure is:

- Required or authorised by law;
- Required in order to investigate an unlawful activity;
- Required by an enforcement body for investigative activities; or
- Necessary to prevent a serious and imminent threat to a person's life, health or safety order, public health or safety.

## Storage and security of Personal Information

Personal Information may be contained in both hard copy and in electronic format. Irrespective of form, your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification, or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

## Access to your Personal Information

We endeavour to keep all Personal Information up to date. However, we rely on you to assist with keeping your Personal Information up to date. You may access the Personal Information we hold about you and to update and/or correct it by contacting us in writing. Where we hold information that you are entitled to access, we will endeavour to provide a suitable range of choices as to how access may be given. If you believe that information held by us is incorrect, incomplete or inaccurate you may request an amendment of that Personal Information. We will consider if the information requires amendment. If we do not agree that there is any ground for amendment we will, if you require, place with your Personal Information, a statement from you as to why the information is not accurate or up to date.

We will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

## Privacy Policy Complaints and Enquiries

We are committed to providing those persons whose Personal Information we hold, a fair and responsible system for the handling of complaints concerning the collection, accuracy or disclosure of Personal Information.

If you have any queries or complaints about our Privacy Policy, or any complaints about a breach of an APP, please contact us by using the following details:

**Windia Pty. Limited ABN 88 003 672 231**  
trading as RBA Australia  
**Address:** PO Box 30, Oatley NSW 2223  
**Email:** [marketing@rba.com.au](mailto:marketing@rba.com.au)  
**Phone:** 1300 788 778

We will deal with any complaints as quickly and efficiently as possible through our complaints handling process. However, if you feel that we have not adequately dealt with your concerns you may refer the matter to the Office of the [Australian Information Commissioner](#).

**Last updated:** 30 November 2023