

# **BEO Group**

## **Privacy Policy**

### **1. INTRODUCTION**

This Policy applies to BEO-Export Australia Pty Ltd (ACN 074 232 830), BEO-Travel Pty Ltd (ACN 103 078 342) and BEO-Finance Pty Ltd (ACN 109 603 483) (referred to as 'we', 'our', 'us') and covers all operations and functions of the group of companies. We are bound by the Privacy Act 1988 ('Privacy Act'), including the Australian Privacy Principles ('APPs'), and recognises the importance of ensuring the confidentiality and security of your personal information.

All third parties (including customers, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by us must abide by this Policy.

Copies of this Policy are available free of charge by contacting our Privacy Officer or can be downloaded from our website [www.beo.com.au](http://www.beo.com.au).

In this Policy:

- 'Disclosing' information means providing information to persons outside of us;
- 'Personal information' means information or an opinion relating to an individual, which can be used to identify that individual;
- 'Privacy Officer' means the contact person for questions or complaints regarding our handling of personal information;
- 'Sensitive information' is personal information that 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, and also includes health information; and
- 'Use' of information means our use of information.

### **2. WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?**

We may collect and hold a range of information about you to provide you with our services, including:

- your full name;
- contact details;
- date of birth;
- occupation;
- copies of identification documents and the form of identification used to send or receive funds;
- transaction information, including details of amounts paid in or out of an individual's account and delivery instructions;
- passport numbers and other government identifiers;
- banking details; and
- credit history.

### **3. HOW DO WE COLLECT PERSONAL INFORMATION?**

We generally collect your personal information by the following methods:

- directly from applications, questionnaires and other forms you complete when you wish to use our services or apply for a position with us;

- from information disclosed to us by you on the phone, or by sending us correspondence (including letters, faxes and emails) or visiting us in person;
- from a variety of third party sources, including our business contacts, identity verification service providers, financial institutions, fund recipients, referrers or travel companies.

The above list is not exhaustive.

In some circumstances we may be provided with personal information about you from a third party. If so, we will take reasonable steps to inform you that we hold the personal information and the purpose for which we hold the personal information. We will take reasonable steps to make you aware of this Policy.

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If you do not provide us with the personal information we request, we may not be able to process your application to transfer funds as requested, provide you with our products or services, or meet your needs appropriately.

We do not give you the option of dealing with us anonymously, or using a pseudonym. This is because it is illegal for us to deal with individuals who are not identified.

#### **4. UNSOLICITED PERSONAL INFORMATION**

We may receive personal information about you when we have taken no active steps to collect that information. This is known as 'unsolicited' personal information. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

#### **5. WHY DO WE COLLECT PERSONAL INFORMATION?**

We collect and hold personal information about you so that we may:

- conduct our business of facilitating the transfer of money both into and out of Australia;
- conduct our travel agency business, including booking flights, accommodation and tours;
- provide banking solutions as an authorised representative of Bendigo Bank limited;
- assist customers to invest in real estate overseas;
- operate our community radio program;
- review and meet your ongoing needs;
- enter into contracts with our subcontractors to conduct our business;
- assess applications by you or others to provide them with our services;
- let you know about other products or services we offer, send you information about special offers or invite you to events;
- consider any concerns or complaints you may have;
- comply with relevant laws, regulations and other legal obligations, including anti-money laundering and financial services laws; and

- help us improve the products and services offered to our customers and enhance our overall business.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or 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 you agree otherwise or an exemption in the Privacy Act applies.

## **6. WHO DO WE COLLECT PERSONAL INFORMATION ABOUT?**

The personal information we may collect and hold includes (but is not limited to) personal information about the following individuals:

- customers;
- potential customers;
- recipients of customer's funds;
- vendors and purchasers of real estate;
- other individuals travelling with a customer using our travel agency service;
- visitors to our website;
- service providers or suppliers;
- beneficiaries and controllers of entities that wish to transfer or receive funds;
- prospective employees; and
- other people with whom we come into contact.

## **7. WEBSITE COLLECTION**

We collect personal information from our website [www.beo.com.au](http://www.beo.com.au) (our Website) through receiving subscription applications and emails. We may also use third parties to analyse traffic at our Website. Information collected through such analysis is anonymous.

Our Website utilises cookies to gather information about how users come to visit our Website, which pages they visit, and what products or services might be of interest to them. Cookies can identify a specific browser on a computer or other device, but are not able, by themselves, to determine the identity of the individual using the device.

The personal information which is entered on our Website is encrypted by us. This means that an individual's personal information cannot be accessed by anyone else using our Website. The encryption process enables all data sent to and from our Website 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.

## **8. WHO DO WE DISCLOSE PERSONAL INFORMATION TO?**

We may disclose personal information to:

- a related entity of ours;
- our business partners that assist us to transfer funds to recipients located overseas;
- entities involved in managing our payments (including payments made on your instructions) and money transfer services, such as our overseas representatives, banks and post offices;
- travel companies, including airlines, wholesalers, hotels and tour companies, involved in your travel booking;

- real estate agents, vendors and purchasers, involved in your purchase of real estate;
- an agent, consultant or service provider we engage to carry out our functions and activities, such as our lawyers, accountants and IT contractors;
- identity verification service providers;
- organisations involved in a transfer or sale of our assets or business;
- organisations involved in managing our corporate risk and funding functions;
- regulatory bodies, government agencies, law enforcement bodies and courts; and
- anyone to whom you authorise us to disclose it.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues and will make third parties aware of this Policy.

In relation to personal information held by us about your 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.

## **9. SENDING INFORMATION OVERSEAS**

We are likely to disclose your personal information to recipients located in the following countries:

- Serbia
- Montenegro
- Bosnia and Herzegovina
- Croatia
- Macedonia
- Slovenia

We may disclose your personal information to countries other than those listed above depending on the services you obtain from us. For example, if you buy travel products from us we may disclose passenger details to overseas travel companies, or if you use our money transfer service we will disclose personal information to entities in the recipient's country that assist us to transfer your funds. If you would like further details about the overseas recipients your personal information may be disclosed to, please contact our Privacy Officer.

We will not disclose your personal information to overseas recipients without your consent unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act, or the APPs; or
- the recipient is subject to a similar information privacy regime.

## **10. MANAGEMENT OF PERSONAL INFORMATION**

We recognise the importance of securing the personal information of our customers. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure.

Your personal information is generally stored in our computer database or using cloud data storage. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines:

- passwords are required to access the system and passwords are routinely checked;
- data ownership is clearly defined;
- we change employees' access capabilities when they are assigned to a new position;
- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- unauthorised employees are barred from updating and editing personal information;
- all computers which contain personal information are secured both physically and electronically;
- data is encrypted during transmission over the network; and
- print reporting of data containing personal information is limited.

## **11. DIRECT MARKETING**

We may use your personal information to send you direct marketing material. We will only use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information; and
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing; and
- we provide a simple way of opting out of direct marketing; and
- you have not requested to opt out of receiving direct marketing from us.

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.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time.

## **12. IDENTIFIERS**

We do not adopt identifiers assigned by the Government (such as passport numbers) for our own file recording purposes, unless one of the exemptions in the Privacy Act applies.

## **13. HOW DO WE KEEP PERSONAL INFORMATION ACCURATE AND UP-TO-DATE?**

We are committed to ensuring that the personal information we collect, hold, use and disclose is relevant, accurate, complete and up-to-date.

We encourage you to contact us if any personal information we hold about you needs to be updated. If we correct information that has previously been disclosed to another entity, we will notify the other entity of the correction within a reasonable period. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We will not charge you for correcting your personal information.

#### **14. ACCESSING YOUR PERSONAL INFORMATION**

Subject to exceptions in the Privacy Act, you can access the personal information that we hold about you by contacting the Privacy Officer. We will generally provide access within 30 days of your request. If we refuse to provide you with access to the information, we will provide reasons for the refusal.

We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged.

#### **15. UPDATES TO THIS POLICY**

This Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment. Notification of changes to this Policy will be published on our Website, or sent directly to individuals (if appropriate).

#### **16. OUR RESPONSIBILITIES**

It is the responsibility of management to inform employees and other relevant third parties about this Policy. Management must ensure that employees and other relevant third parties are advised of any changes to this Policy. 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 Privacy Policy will not be an acceptable excuse for non-compliance.

#### **17. TRAINING**

All employees must be provided with timely and appropriate access to this 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 affect our business.

#### **18. PRIVACY AUDITS**

We conduct 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 disclosed to anyone;
- whether the intended use of the collection is communicated; and
- whether that information is current, relevant and necessary.

## **19. NON-COMPLIANCE & DISCIPLINARY ACTIONS**

Any 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 this Policy may be subject to disciplinary action.

## **20. CONTRACTUAL ARRANGEMENTS WITH THIRD PARTIES**

We must ensure that all contractual arrangements with third parties adequately address privacy issues. Each third party is made aware of this Privacy Policy, and is required to implement policies in relation to the management of personal information in accordance with the Privacy Act, including:

- regulating the collection, holding, use and disclosure of personal information;
- de-identifying and destroying 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 third party; and
- ensuring that personal information is only disclosed to organisations which are approved by us.

## **21. MAKING A COMPLAINT**

If you have any questions about this Policy, or wish to make a complaint about how we have handled your personal information, you can contact our Privacy Officer on the contact details below.

We aim to respond to complaints within 30 days of receipt. If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner by:

- telephoning - 1300 363 992
- writing - Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
- emailing - [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## **22. ENQUIRIES**

If you have any questions about privacy-related issues please contact our Privacy Officer by:

- telephone – 02 8781 1950
- fax – 02 9822 5429
- visiting – 68 Moore Street, Liverpool NSW 2170 AUSTRALIA
- letter – Privacy Officer, PO Box 932, Liverpool BC NSW 1871
- email – [info@beoexport.com](mailto:info@beoexport.com)