

Privacy Policy

1 Introduction

Jasnor (Australia) Pty Ltd (**Jasnor**) is a leading supplier, distributor and manufacturer of toys and gifts.

Here at Jasnor, we are committed to the privacy and security of any personal information provided to us. Personal information is information or an opinion about an individual who is reasonably identifiable.

This privacy policy, which can be viewed on our website here (<https://www.jasnor.com.au/privacy>) explains how we handle and protect your personal information. We do this in accordance with the *Privacy Act 1988* (Cth) (**Act**).

Some personal information collected and held about current or former employees is exempt from the Act where it directly relates to their employment relationship with Jasnor.

We may modify or amend this policy at any time. If you have any questions, please submit them to our Data Protection Officer by email to privacy@jasnor.com.

2 What information does Jasnor collect?

How we collect personal information, and what personal information we collect, depends upon our relationship with you. We will do so only where the information is reasonably necessary for one or more of our functions or activities, as permitted under the Australian Privacy Principles under the Act.

If you are a customer or a supplier, we will normally collect specific information relating to your business, such as your business name, address, phone, email and details of your contact person. We may also collect personal information such as your full name, home address and date of birth.

If you are a staff member, we would normally collect details of your name, address, personal phone number, email address and date of birth, as well as details of your employment history, tax number, superannuation details and bank account details so we can pay you.

Jasnor will also collect and record any other information that suppliers or customers give us while using or purchasing our goods and services or otherwise engaging with us.

If you do not provide Jasnor with personal information we request, we may not be able to provide certain (or any) of our goods or services to you nor allow you to take part in provision of any such goods and services. You may view our website anonymously, though.

3 How does Jasnor collect your personal information?

3.1 Jasnor uses cookies

In providing access to our website, Jasnor uses “cookies”. A cookie is a small text file that is stored on your computer for record-keeping purposes.

A cookie does not identify you personally or contain any other information about you but it does identify your computer.

Jasnor uses these cookies to collect or store your preferences or collect information on how you visit and access our web pages, and we use this deidentified information for statistical and analytical purposes.

3.2 Directly from you

Jasnor collects your personal information directly from you unless it is unreasonable or impracticable to do so.

Our methods of collection may include collecting data you have:

- (a) written or entered into our entry points via our website;
- (b) entered into any application forms we have sent to you (either physically or online);
- (c) entered into any emails you have sent to us;
- (d) disclosed in your other communications with us or with our suppliers where they may have passed such information on to us.

3.3 From third parties

Jasnor may also collect personal information from third parties including:

- (a) information provided on your behalf with your consent;
- (b) from any person who has referred to you in their communications with us, referred you to us or to whom you are referred.

4 How does Jasnor store your personal information?

We store all personal information securely on our on-premise server located at our offices. These systems are protected by passwords as well as standard network security and firewalls.

We also use a cloud-based backup disaster recovery system which encrypts data (including personal information) and stores it encrypted.

Jasnor retains personal information only for as long as necessary to fulfil the purposes for which it was collected or as required by law, after which it is securely deleted or de-identified.

5 Why does Jasnor collect and how does Jasnor use your personal information?

5.1 Primary purposes

Jasnor uses your personal information for the primary purposes of providing customers with our goods and services, maintaining our relationships with customers, suppliers and staff, and communicating with you in relation to the relationship we have with you.

5.2 Secondary purposes

Jasnor may use your personal information for secondary purposes including:

- (a) internal review
- (b) training
- (c) improvement of all or any part of our goods and services

- (d) data research and analysis
- (e) direct marketing communications with you (but you may opt out of receiving direct marketing communications from us at any time by contacting sales@jasnor.com or by using the unsubscribe link in our direct marketing communications)
- (f) provision to our contractors for any of the purposes referred to at (a) to (e) above
- (g) obtaining legal advice or exercising or protecting our legal rights and/or those of our staff and/or contractors.

6 Will Jasnor share your information?

Other than as set out above, Jasnor does not disclose personal information to anyone except the relevant suppliers and customers, as well as any of our staff and contractors who need that information in order to provide or facilitate the provision of our goods and services or to procure supplies.

We may be required by law to disclose information you provide to us, in which case we only disclose information to the extent we are required to disclose it and only to those to whom we are required to disclose it, or if necessary to our legal, debt recovery or accounting advisors for the purposes of obtaining legal, debt recovery or accounting advice or services, as the case may be.

Other than in the circumstances outlined above or as otherwise specifically permitted under the Act, the information you supply to us remains stored confidentially on our secure servers and is not shared with third parties.

7 Jasnor can aggregate non-personal information

Jasnor may access, aggregate and use non-personal information we have collected from you. This data will in no way identify you or any other individual. Jasnor may use this aggregated non-personal information to:

- (a) assist us to better understand how customers are using our goods and services,
- (b) assist us to better understand how suppliers are contributing to our goods and services,
- (c) provide further information regarding the uses and benefits of our goods and services,
- (d) enhance business productivity, including by creating useful business insights from that aggregated data, and
- (e) otherwise to improve our goods and services.

8 Anonymity and Pseudonymity

You can view our website anonymously. However, Jasnor will generally need to know who you are in order to provide you with our goods and services.

It will generally not be possible to transact with us anonymously or by using a pseudonym.

9 Automated decision making

Automated decision making takes place when an electronic system uses personal data to make a decision without human intervention. You will not be subject to decisions that will have a significant impact on you based solely on automated decision making, unless Jasnor has a lawful basis for doing so and has notified you.

10 Cross-Border Disclosure

If you are located outside Australia, Jasnor may provide information to you, including personal information relating to you or others associated with you. We may also on some occasions disclose your personal information to advisors we have in New Zealand.

Where Jasnor discloses personal information overseas, we take reasonable steps to ensure that the recipient handles the information in accordance with the Australian Privacy Principles.

Otherwise, Jasnor will not communicate personal information to anyone outside Australia unless legally required to do so, we have your consent or we are permitted to do so under the Act.

11 Notifiable Data Breach

In the event that there is a data breach and Jasnor is required to comply with the notification of eligible data breaches provisions in Part IIIC of the Act or any other subsequent sections or legislation which supersede those provisions, Jasnor will take all reasonable steps to contain the suspected or known breach where possible and follow the process set out in this clause.

Jasnor will take immediate steps to limit any further access or distribution where possible. If Jasnor has reasonable grounds to suspect that the data breach is likely to result in serious harm to any individuals involved, then Jasnor will take all reasonable steps to ensure an assessment is completed within 30 days of the breach or sooner if possible. Jasnor will follow the guide published by the Office of the Australian Information Commissioner (if any) in making this assessment.

If Jasnor reasonably determines that the data breach is not likely to result in serious harm to any individuals involved or any remedial action Jasnor takes is successful in making serious harm no longer likely, then no notification or statement will be made.

Where, following an assessment and undertaking remedial action (if any), Jasnor still has reasonable grounds to believe serious harm is likely, as soon as practicable, Jasnor will provide a statement to each of the individuals whose data was breached or who are at risk. The statement will contain details of the breach and recommendations of the steps each individual should take. Jasnor will also provide a copy of the statement to the Office of the Australian Information Commissioner.

Jasnor will then review the incident and take action to prevent future breaches.

12 Accessing and correcting your personal information

If at any time you want to inquire about any of the personal information that we store, request any data to be deleted or to request any amendment or correction to that information, please contact: privacy@jasnor.com.

Under the Act, you have the right to ask for access to personal information that Jasnor holds about you, and ask that Jasnor corrects that personal information.

You can ask for access or correction by contacting us and we will generally respond within 30 days. If you ask, we must give you access to your personal information, and take reasonable steps to correct it if we consider it is incorrect, unless there is a law that allows or requires us not to.

Jasnor will ask you to verify your identity before we give you access to your information or correct it, and we will try to make the process as simple as possible. If we refuse to give you access to, or correct, your personal information, we must notify you in writing setting out the reasons.

If we make a correction and have disclosed the incorrect information to others, you can ask us to tell those others about the correction. We must do so unless there is a valid reason not to.

If we refuse to correct your personal information, you can ask us to associate with it (for example, attach or link) a statement that you believe the information is incorrect and why.

13 How to make a complaint

If you wish to complain to Jasnor about how we handled your personal information, you should complain in writing. If you need help lodging a complaint, you can contact us.

If we receive a complaint from you about how we handled your personal information, we will determine what (if any) action we should take to resolve the complaint.

Jasnor will tell you promptly that Jasnor received your complaint and will generally respond to the complaint within 30 days.

If you are not satisfied with Jasnor's response you can contact:

Office of the Australian Information Commissioner (OAIC)
Website: www.oaic.gov.au
Email: enquiries@oaic.gov.au
Phone: 1300 363 992

14 How does Jasnor protect your information?

To ensure the confidentiality and integrity of your personal information, Jasnor implements industry-standard security measures to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. These include password-protected systems, firewalls, encryption, staff training, and physical office security.

15 This policy may be updated from time to time

As stated earlier, Jasnor reserves the right to change this policy at any time, and any amended policy is effective upon posting to our website. From time to time we will review this policy to keep pace with changes in our goods or services, the Act and any other relevant data protection laws.