



# Devco Australia Holdings Pty Ltd

P O Box 14, Pinkenba QLD 4008 | 398 Tingira Street, Pinkenba QLD 4008

Ph: +61 7 3260 2361 |

Web: [www.sulphur.com.au](http://www.sulphur.com.au) | Email: [customerservice@sulphur.com.au](mailto:customerservice@sulphur.com.au)

## PRIVACY POLICY

### 1. Privacy Policy

1.1 Devco Australia Holdings Pty Ltd ABN 45 098 077 662 (“**Devco**”) takes all reasonable steps to implement processes and procedures to safeguard Personal Information. While not claiming to be a statement of compliance, this Privacy Policy outlines Devco’s use, collection, and storage of Personal Information in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988* (as amended).

1.2 This Privacy Policy applies to all Personal Information collected by Devco in the course of providing products and services to Customers (**Customers**) regardless of the source of that Personal Information. This Privacy Policy may be available at .

1.3 This Privacy Policy should be read in conjunction with the Terms and Conditions of Devco which may be available at <https://www.sulphur.com.au/>.

### 1.4 Definitions

**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.

**Privacy Policy** means this privacy policy and amendments made to it.

## 2. Collection of Personal Information

### 2.1. Personal Information

Devco collects Personal Information about Customers and potential Customers in order to provide the Customers with the products and services they have requested. If this information is not provided, Devco may not be able to provide Customers with the requested products and/or services. Devco endeavours to collect Personal Information from Customers directly.

Personal Information Devco obtains from third parties or publicly available information is limited to circumstances where the Customer has consented whether that be expressly or impliedly.

### 2.2 Types of Personal Information Collected

Personal Information Devco collects includes a person’s first and last names, email address, business name and any other Personal Information supplied to them.

### 2.3 Purpose of collection and use

Devco collects, holds, uses, and discloses the Personal Information to deliver and improve the products and services Devco provides to Customers. Generally, Customers are only obliged to provide Devco with information necessary for Devco to provide products and services to the Customer. However, if Customers do not provide Devco with certain types of



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Personal Information, Devco may be unable to provide the Customer the products and services they have requested.

## 3. Access, correction, and complaints procedure

### 3.1 Accessing Personal Information about you

If a Customer would like to access or correct any Personal Information that Devco holds about them, please contact:

Devco Australia Holdings Pty Ltd  
398 Tingira Street  
PINKENBA QLD 4008

Email: [customerservice@sulphur.com.au](mailto:customerservice@sulphur.com.au)

The Customer will need to identify themselves to the reasonable satisfaction of Devco before it will provide the Customer with Personal Information about an individual which Devco may or may not have in its possession.

### 3.2 Complaints procedure

If a Customer has a complaint about Devco's collection or use of Personal Information pertaining to that Customer, then the Customer is requested to contact Devco at first instance.

After investigating the Customer's complaint and reporting to the Customer about an alleged breach of the Australian Privacy Principles and reporting the results of Devco's investigations to the Customer, the Customer is not satisfied, then Devco requests that the Customer consult:

The Australian Information Privacy Commissioner  
GPO Box 5218  
SYDNEY NSW 2001  
Telephone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

A complaint form can be found at:

[https://forms.business.gov.au/smartforms/landing.htm?formCode=APC\\_PC](https://forms.business.gov.au/smartforms/landing.htm?formCode=APC_PC)

### 3.3 Anonymity and use of pseudonyms

Where practical and reasonable to do so, Devco provides Customers with the opportunity to use pseudonyms in relation to information Customers provide to it. Where appropriate Devco will provide Customers with the option to interact anonymously.

### 3.4 How Devco deals with unsolicited Personal Information

Devco only collects Personal Information about individuals by lawful and fair means.



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## **3.5 Notice of Collection of Personal Information**

Where possible, Devco notifies the Customers when it is collecting Personal Information about the Customers, the use of which is subject to this Privacy Policy.

## **4. Use of Personal Information in Direct Marketing**

### **4.1 Direct Marketing**

Devco may use Personal Information for the purposes of promoting products and services to Customers where they would reasonably expect it to be used for this purpose. If Devco uses a Customer's Personal Information to provide them with promotional and marketing information, Devco will provide the Customer with an option to opt out of this service.

### **4.2 Opting Out**

Customers can unsubscribe to Devco's marketing material by clicking on the functional unsubscribe facility contained in an email or can contact The Privacy Officer on the details set out above.

## **5. Integrity of Personal Information**

### **5.1 Security measures taken for Personal Information**

Devco takes reasonable steps to protect the Personal Information it holds from misuse and loss and from unauthorised access. Further, Devco takes reasonable steps to destroy or permanently de-identify Personal Information if it is no longer needed for the purpose it was collected.

### **5.2 Accuracy**

Devco takes reasonable steps to ensure that the Personal Information it collects, uses, or discloses is accurate, complete and up to date.

### **5.3 Security**

Devco takes reasonable steps to safeguard the disclosure of Personal Information from third parties, contractors, and staff. Devco has up to date procedures and policies relating to information technology as it relates to staff and strives for best practice in this area. This may include training for staff in relation to privacy, access control of sensitive data, clear communication of policies, procedures, and the importance of respecting privacy guidelines.

## **6. Changes to Privacy Policy**

This Privacy Policy may change from time to time. The current version of this Privacy Policy can be found at <https://www.sulphur.com.au/>. This Privacy Policy was last updated on 24 August 2022.