

Privacy Policy



-  Structural
-  Geotechnical
-  Civil
-  Residential
-  Forensic
-  Building Services
-  Surveying

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1 Privacy Policy

1.1 Privacy Statement

Intrax takes privacy seriously and is covered by 13 Australian Privacy Principles (APPs) as set out in the Privacy Amendment (Enhancing Privacy Protections) Act 2012, which amends the Privacy Act 1988. From 14 March 2014, the APPs replace the National Privacy Principles (NPPs) and Information Privacy Principles (IPPs).

To comply with our obligations under the APPs Intrax have a Privacy Policy, which sets out how we manage privacy in our organisation.

Intrax Consulting Engineering ("us", "we", or "our") operates the www.intrax.com.au website (the "Service").

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from www.intrax.com.au

1.1.1 Definitions

Service

Service is the www.intrax.com.au website operated by Intrax Consulting Engineering

Personal Data

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Cookies

Cookies are small pieces of data stored on your device (computer or mobile device).

Data Controller

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

Data Processors (or Service Providers)

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

Data Subject (or User)

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

1.2 Intrax Privacy Compliance Officer

The Intrax Privacy Compliance Officer is the Managing Director, who is the first point of contact for all privacy issues, including handling access requests and complaints should they arise.

1.3 Privacy and Confidentiality

As responsible corporate citizens we appreciate the importance of confidentiality. This part of the obligation remains unchanged by this privacy policy.

The privacy policy deals with our customers and our employee's additional right to privacy and is independent of our contractual and ethical obligations.

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally, identifiable information may include, but is not limited to:

- Your name
- Date of birth
- Address
- Next of kin
- Contact Information (phone, e-mail)
- Occupation
- Career history
- Career plans
- References
- Results of aptitude and other tests
- Tax file numbers
- Superannuation details
- Banking details
- Performance reviews
- Training and qualification details
- Resumes

Intrax collects the following personal information on Customers:

- Company Trading Name
- Company address and contact information including e-mail address
- Trading record
- Trading references
- Details of Directors
- Sales trading history
- Purchasing history from Intrax
- Meeting records between Intrax and client
- Phone call and e-mail records between Intrax and client
- Cookies and usage data

1.4 Collection of Information

Intrax collects personal information in order to provide commercial services to our customers, and to maintain legitimate employee and client records.

We do not as a rule collect sensitive information, (as defined in the Privacy Act), however should we do so, we explain the reasons for doing so at the time of collection and collect it only with the employee's consent or the consent of our customer.

1.5 Access to your Personal Information

Intrax provides access to the personal information that we hold about employees and customers. Access will be provided in accordance with our Access Policy.

1.6 Complaints

If you have any complaints about our privacy practices or wish to make a complaint about how your personal information is managed, please contact the Intrax Privacy Compliance Officer. Complaints will be handled under the Intrax Privacy Complaints Policy.

1.7 Storage, Review and Disposal

We take all reasonable steps to protect the security of the personal information that we hold. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

The majority of personal information collected by Intrax is securely stored in our Cloud based CRM and ERP systems, which are stored on Cloud based servers. The storage of this data may change location based on the 3rd party company's storage location. This data is encrypted and complies with International Privacy Policies.

Personal information that Intrax collect, use, or disclose on an employee will be reviewed annually during the employee's annual review to ensure the information is accurate, up-to-date, relevant, and complete. Any changes or corrections required to the information held may be made at that time, or at a time when identified or requested.

Any information held by the company that is no longer needed for any authorised purpose will be reasonably destroyed or de-identified, subject to the exceptions defined in APP 11. This includes any information, such as interview notes, held by the company on candidates making application for employment with the company.

1.8 Use of Data

Intrax Consulting Engineering uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

1.9 What happens if you choose not to provide the information?

You are not obliged to give us your personal information. However, if you choose not to provide Intrax with personal details, we may not be able to provide employees or customers with our full range of support and services.

1.10 Disclosure of Personal Information

The information collected by Intrax is strictly confidential. Intrax will not reveal, disclose, sell, distribute, rent, licence, share, or pass that information on to third parties other than those contractors which may from time to time be required to provide services to the company and which are contractually bound to impose similar restrictions to the Intrax Privacy Policy.

However we may disclose personal information, other information, or data we collect from you for the purpose specified to you at the time of collection or for other purposes if you would reasonably expect us to disclose such information for that purpose.

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

1.11 Sources of Information

Where possible Intrax will solicit and collect information directly from Intrax customers, or directly from Intrax employees.

If personal information about an individual was not solicited by Intrax, or not collected from the individual but from another party, Intrax will advise that individual of the collection and provide the other party with the Intrax Privacy Policy. Unsolicited personal information will only be retained if reasonably necessary and with consent from the individual, and will be given the same privacy protection as solicited personal information, as defined in the APP 4.

1.11.1 Location data

We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customize our Service.

You can enable or disable location services when you use our Service at any time, through your device settings.

1.12 Web Site use of cookies

A cookie is a small message given to your web browser by our web server. The browser stores the message in a text file, and the message is then sent back to the server each time the browser requests a page from the server.

1.12.1 Tracking cookies data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.

- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

1.13 Security

We use a variety of physical and electronic security measures including restricting physical access to our offices, firewalls and secure databases to keep personal information secure from misuse, loss, unauthorised use or disclosure, and interference. Cloud based storage is encrypted and complies with International Privacy Policies. The Internet is not a secure environment. If you use the Internet to send Intrax any information, including your email address, it is sent at your own risk.

1.14 Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Intrax Consulting Engineering legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Intrax Consulting Engineering may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes
- To comply with the law

1.15 Retention of Data

Intrax Consulting Engineering will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Intrax Consulting Engineering will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

1.16 Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Australia and choose to provide information to us, please note that we transfer the data, including Personal Data, to Australia and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Intrax Consulting Engineering will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization

or a country unless there are adequate controls in place including the security of your data and other personal information.

1.17 Disclosure of Data

1.17.1 Business Transaction

If Intrax Consulting Engineering is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

1.17.2 Disclosure for Law Enforcement

Under certain circumstances, Intrax Consulting Engineering may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

1.17.3 Legal Requirements

Intrax Consulting Engineering may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Intrax Consulting Engineering
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

1.18 Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

1.19 "Do Not Track" Signals

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

1.20 Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Intrax Consulting Engineering aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- **The right to access, update or to delete the information we have on you**
Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- **The right of rectification**
You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object**
You have the right to object to our processing of your Personal Data.
- **The right of restriction**
You have the right to request that we restrict the processing of your personal information.
- **The right to data portability**
You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- **The right to withdraw consent**
You also have the right to withdraw your consent at any time where Intrax Consulting Engineering relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

1.21 Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

1.21.1 Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

- **Google Analytics**
Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.
You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.
For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

1.21.2 Behavioural Remarketing

Intrax Consulting Engineering uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

- **Google AdWords**
Google AdWords remarketing service is provided by Google Inc.
You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

- **Facebook**

Facebook remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting this page:

<https://www.facebook.com/help/164968693837950>

To opt-out from Facebook's interest-based ads follow these instructions from Facebook:

<https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy:

<https://www.facebook.com/privacy/explanation>

- **Perfect Audience**

Perfect Audience remarketing service is provided by NowSpots Inc.

You can opt-out of Perfect Audience remarketing by visiting these pages: Platform Opt-out

(<http://pixel.prft.co/coo>) and Partner Opt-out (<http://ib.adnxs.com/optout>).

For more information on the privacy practices of Perfect Audience, please visit the Perfect Audience Privacy Policy Opt-out web page: <https://www.perfectaudience.com/privacy/index.html>

1.21.3 Payments

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

- **Apple Store In-App Payments**
Their Privacy Policy can be viewed at <https://www.apple.com/legal/privacy/en-ww/>
- **Google Play In-App Payments**
Their Privacy Policy can be viewed at <https://www.google.com/policies/privacy/>
- **Stripe**
Their Privacy Policy can be viewed at <https://stripe.com/us/privacy>
- **PayPal or Braintree**
Their Privacy Policy can be viewed at <https://www.paypal.com/webapps/mpp/ua/privacy-full>
- **FastSpring**
Their Privacy Policy can be viewed at <http://fastspring.com/privacy/>
- **Authorize.net**
Their Privacy Policy can be viewed at <https://www.authorize.net/company/privacy/>
- **2Checkout**
Their Privacy Policy can be viewed at <https://www.2checkout.com/policies/privacy-policy>
- **Sage Pay**

- Their policies can be viewed at <https://www.sagepay.co.uk/policies>
- **Square**
Their Privacy Policy can be viewed at <https://squareup.com/legal/privacy-no-account>
- **Go Cardless**
Their Privacy Policy can be viewed at <https://gocardless.com/en-eu/legal/privacy/>
- **Elavon**
Their Privacy Policy can be viewed at <https://www.elavon.com/privacy-pledge.html>
- **Verifone**
Their Privacy Policy can be viewed at <https://www.verifone.com/en/us/legal>

1.22 Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

1.23 Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

1.24 Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

2 Access and Correction Policy for Private Information

The purpose of this Policy is to set out how Intrax will provide access to and correction of your personal information. The Policy is part of our Privacy Policy and our desire to provide for, maintain and give effect to your right to privacy.

2.1 Overriding Principles

At all times the conduct under this Policy will be governed by the following principles:

- All requests for access or correction will be treated seriously
- All requests will be dealt with promptly
- All requests will be dealt with in a confidential manner
- Your request to access or correct your personal information will not affect your existing obligations or effect the commercial arrangements between you and Intrax.

2.2 Form of Access

Employee private information will be stored and accessible to you, via our on line HR system.

For any other information, you can make a request to access the information in writing by contacting the Intrax Privacy Compliance Officer.

2.3 When will Access or Correction be denied?

Where possible, Intrax will favour providing access in the manner requested by the individual if reasonable to do so. Where there is a refusal or dispute about the right or forms of access or correction, the company will provide the individual with written reasons and these will be dealt with in accordance with the Intrax Grievance Procedure.

Access will be denied if:

- The request does not relate to the personal information of the person making the request; providing access would pose a serious and imminent threat to life or health of a person; Providing access would create an unreasonable impact on the privacy of others;
- The request is frivolous and vexatious;
- The request relates to existing or anticipated legal proceedings;
- providing access would prejudice negotiations with the individual making the request; Access would be unlawful;
- Denial of access is authorised or required by law;
- Access would prejudice law enforcement activities;
- Access discloses a 'commercially sensitive' decision making process or information; or Any other reason that is provided for in the Australian Privacy Principles (APPs) set-out under the Privacy Act.

2.4 Time

We will take all reasonable steps to provide access within 30 days of your request. In cases where the request is not complicated or does not require access to a large volume of information, we will provide information within 14 days.

2.5 Costs and Charges

Intrax may impose the following charges:

- Photocopying
 - Delivery cost of information stored off-site – where information is stored off-site, the cost of obtaining access to the information.
- Access to electronic databases
- Any other fees as may be applicable at the time of request

Intrax will make these fees and charges known to the individual prior to processing their request. Costs and charges will not apply to the making of the request, for correcting the personal information, or for associating the statement with the personal information.

2.6 Privacy Complaints

Intrax is committed to protecting the privacy of the personal information that we hold and is also committed to handling complaints quickly and fairly

All complaints will be:

- Treated seriously
- Dealt with promptly
- Dealt with in a confidential manner

The privacy complaint will not affect your existing obligations or the commercial arrangements that exist between this organisation and you.

2.7 Who may complain under this policy?

If you have provided us with personal information, you have a right to make a complaint, have it investigated and dealt with under this policy.

2.8 What is a privacy complaint?

A privacy complaint relates to any concern or dispute that you have with our privacy practices as it relates to your personal information.

This could include matters such as how:

- Personal information is collected
- Personal information is stored
- This information is used or disclosed
- Access is provided

2.9 What do I do if I have a complaint about privacy practices?

Intrax resolves grievances at the local level if possible. If you have a complaint about privacy please contact the Intrax Privacy Compliance Officer, or advise your usual recognised Intrax contact. Your Intrax contact will on-forward your complaint to the Intrax Privacy Compliance Officer.

You may complain orally or in writing. The Intrax Privacy Compliance Officer will have the authority to resolve your complaint.

2.10 Anonymity and Pseudonymity

Intrax will do its best to deal with anonymous or pseudonym complaints from clients or employees, although we may not be able to investigate fully and follow-up such complaints. However, in the event that an anonymous or pseudonym complaint is received Intrax will note the issues raised and try and resolve them appropriately.

2.11 Grievance Procedure

The goal of this policy is to achieve an effective resolution of your complaint within a reasonable set timeframe of approximately 28 days or as soon as practicable.

Once the complaint has been made, and the matter is in the hands of the Intrax Privacy Compliance Officer, the matter can be resolved in several ways:

2.11.1 Request further information and investigation

The Intrax Privacy Compliance Officer may request further information from you. You should be prepared to give as many details as possible including details of any relevant dates and documentation. This will enable Intrax to investigate the complaint and determine an appropriate and useful solution. All details provided will be kept confidential.

The complaint may be investigated. The organisation will try to do so as soon as possible. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.

2.11.2 Discuss options

We will discuss options for resolution and if you have suggestions about how the matter might be resolved you should discuss these with the Intrax Privacy Compliance Officer. The Intrax Privacy Compliance Officer could also suggest other solutions or give examples of how the personal information can be revised or stored in a different way.

2.11.3 Refer to Executive Director

If your complaint is not resolved at the local level, it will be referred to one of the Executive Directors. The Director would be provided with the history and may discuss the complaint with the employees, or other parties that are involved.

2.11.4 Resolution

You will be informed of the outcome and the reasons for the decision. If this does not resolve the complaint, the matter will be referred to a mutually agreed intermediary.

If after the above steps have been followed you are still dissatisfied with the outcome you may refer the complaint to the Federal Office of the Privacy Commissioner.

2.11.5 Records

The organisation will keep a record of your complaint and the outcome.

2.12 Information

For further information about this policy, please contact the Intrax Privacy Compliance Officer.

- By email: info@intrax.com.au
- By phone number: 0383710100
- By mail: 35 Bank St, South Melbourne, Victoria 3205