



## **Bearing360 Limited Privacy Policy**

This policy sets out how Bearing360 Limited (“**Bearing360**”) collects, uses, and discloses “personal information” concerning job applicants, customers, suppliers, guarantors and other third parties.

### Scope

This policy applies to all personal information that Bearing360 collects from job applicants, customers, suppliers, guarantors and other third parties.

### Principles

#### **1. Applicable Laws**

The Privacy Act 2020 (“**New Zealand Privacy Act**”) and the Privacy Act 1988 (cth) (“**Australian Privacy Act**”) apply to personal information collected by Bearing360. The New Zealand Privacy Act and the Australian Privacy Act are referred to in this policy as “**Privacy Legislation**”.

#### **2. What is personal information?**

“Personal information” is information or an opinion about an identified individual, or an individual who is reasonably identifiable; whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.

#### **3. What personal information does Bearing360 collect and hold?**

The types of personal information Bearing360 may collect, and hold includes, without limitation:

- Name and contact details (including phone numbers, addresses and emails)
- Details from curriculum vitae and information provided by nominated referees
- Date of birth
- Identification details (such as drivers licence details or other form of ID)
- Details of products and services provided
- Details needed to deliver products and services or answer any questions
- Marketing preferences
- Details held by an individual’s employer (such as job titles)
- Feedback about Bearing360’s products or services
- Financial details including annual earnings

289 Great South Road, Ellerslie, Auckland 1051

Private Bag 92004, Auckland 1142

Email: [sales@bearing-360.com](mailto:sales@bearing-360.com) | [shipbookings@bearing-360.com](mailto:shipbookings@bearing-360.com)

Web: [www.bearing-360.com](http://www.bearing-360.com) LinkedIn: [Bearing360](#)



- Payment information (such as credit card or bank details)
- Trade reference details
- Assessments, evaluations, scores, and other information relating to creditworthiness
- Credit information
- Online identifiers such as cookies and IP addresses

Bearing360 may also collect sensitive personal information including information about an individual's financial position, criminal record, or their membership of a trade union or other professional body.

#### **4. How does Bearing360 collect personal information?**

Bearing360 collects personal information where an individual:

- When that individual submits a job application to Bearing360
- Provides information to Bearing360 in account application forms or through an online inquiry
- Purchases goods from Bearing360
- Contacts Bearing360 or where Bearing360 contacts an individual (by phone, email or in person)
- Takes part in a competition or survey or subscribes to a mailing list
- Visits Bearing360's website or online portals

Bearing360 may also collect personal information from third parties such as:

- Bearing360's related companies
- Publicly available sources of information including government database services and social media accounts
- Market research providers
- Credit reporting bodies
- Law enforcement agencies and other government entities
- Trade references
- Service providers, such as recruitment or temporary staffing agencies, background check providers, former employers
- An individual's authorised representative or legal advisor

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An individual may choose not to share their personal information with Bearing360. In such cases, Bearing360 may be unable to assess or progress an application for employment, provide products or services, or may be delayed or prevented from fulfilling contractual or legal obligations.

## 5. How does Bearing360 use personal information?

Bearing360 may use personal information for any of the following purposes:

- For the particular purpose for which an individual shared personal information
- To assess a person's eligibility for employment at Bearing360
- To provide products and services
- To maintain, manage and develop Bearing360's relationship with customers, potential customers, suppliers, and service providers
- For marketing purposes
- To carry out market research and analysis and improve the provision of goods or services
- For internal administrative purposes, such as (but not limited to) procedural assessment, risk management, staff training, accounting, billing, product, and service reviews
- To assess eligibility to be provided with credit
- To assess credit history, including creditworthiness or credit capacity
- To process payments and to assist in the collection of overdue payments
- To satisfy trade credit and other insurance requirements
- To monitor activity on Bearing360' websites
- To identify and inform third parties about other products, services or offerings that may be of interest
- Managing insurance
- For the purposes of law enforcement and court proceedings
- For any other purpose required or permitted by Privacy Legislation or applicable law

## 6. Disclosure of personal information

The types of third parties to which Bearing360 may disclose personal information include:

- Professional advisors and service providers (such as lawyers, accountants, data storage providers, IT service providers)
- A proposed purchaser of Bearing360's business and assets

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- Debt collection agencies and other parties that assist with debt recovery
- Bearing360's related companies
- Government and regulatory authorities
- Credit reporting bodies, for the purposes permitted under Privacy Legislation

Bearing360 discloses credit information to credit reporting bodies in order to obtain credit information from them. Those credit reporting bodies use that information to carry on their credit reporting business. Bearing360 may share personal information, credit information and credit-eligibility information with the Centrix Group Limited.

A copy of the Credit Reporting and Privacy Policy of Centrix Group Limited is available at [www.centrix.co.nz](http://www.centrix.co.nz). An individual may contact Centrix Group Limited to make a complaint. If any individual believes on reasonable grounds that they are, or are likely to be, a victim of fraud, they may request that Centrix Group Limited does not use or disclose their credit information.

## **7. Transfer of personal information overseas**

Bearing360 may disclose personal information to overseas recipients, including to Bearing360's related companies in New Zealand, Australia, Hong Kong, Malaysia, or Japan.

## **8. Retention and destruction of Personal Information**

Bearing360 will keep personal information for as long as is necessary to meet the purpose for which it was collected, or as otherwise required by law. When Bearing360 no longer requires personal information, Bearing360 may destroy or dispose of that personal information in a secure manner, or permanently de-identify it.

## **9. Third party websites**

An individual may follow a link from Bearing360's website to a third party's website. Bearing360 is not responsible for the treatment of personal information submitted to that third party through its website. Third parties will collect and use personal information in accordance with their own privacy policies.

## **10. Updates**

Bearing360 may revise or update this Privacy Policy from time to time. The most recent version of Bearing360's Privacy Policy will be available at [www.Bearing-360.com](http://www.Bearing-360.com). This policy was last updated in June 2023.

## **11. Contact Us**

289 Great South Road, Ellerslie, Auckland 1051  
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If an individual:

- has any questions about this Privacy Policy
- wishes to correct or update information Bearing 360 holds about them
- wishes to request access to or correction of personal information
- wishes to make a complaint about a breach by Bearing360 of Privacy Legislation (including the way Bearing360 has collected, disclosed or used personal information),

Bearing360's Privacy Officer may be contacted at:

Bearing360 Limited  
289 Great South Road  
Ellerslie  
Auckland 1051  
Email: [darin.thacker@bearing-360.com](mailto:darin.thacker@bearing-360.com)

Bearing360 will acknowledge receipt of the communication and provide a response as soon as practicable. In some cases, in accordance with Privacy Legislation, Bearing360 may charge a fee for access to personal information or refuse to provide access.

## 12. Complaints

If an individual is unhappy with the way Bearing360 handles a complaint or a request to access information, that individual may contact the Office of the Australian Information Commissioner or the New Zealand Privacy Commissioner. Their respective contact details are available at [www.oaic.gov.au](http://www.oaic.gov.au) and [www.privacy.org.nz](http://www.privacy.org.nz).