

# Bankston

## Privacy Policy United States

### Who are we?

SDG North America LLC (“Bankston”, “we”, “us”, “our”) is a Delaware limited liability company. This privacy policy (‘policy’) applies to all information collected by us, including via our website [bankston.com](http://bankston.com)

We are committed to providing our valued clients with the best possible customer service experience. To help us in our personal approach there are some pages on this site that ask for personal details, but please rest assured that we do take your privacy seriously.

The purpose of this policy is to ensure that any individual who provides personal information to Bankston is protected under US law in accordance with the *California Consumer Privacy Act of 2018* (‘Privacy Act’) and any other relevant laws.

Words defined in the Privacy Act have the same meaning when used in this policy.

### Personal information

When we refer to **personal information** we mean information from which your identity is reasonably apparent.

Our products and services are not directed at individuals under the age of 16 and we do not knowingly collect personal information from such individuals. If we become aware that a person under the age of 16 has provided us with personal information we will take steps to delete such information..

### The personal information we collect

The kinds of personal information we collect about you will depend on how you interact with us:

**When you use our website:** We collect general site traffic data for the purpose of site maintenance and improvement and understanding which and how often certain pages are viewed. While this data is generally anonymous, we may collect your IP address, approximate geographic location and data sent to us by your web browser, such as

your operating system. Please refer to the ‘Advertising and tracking’ and ‘Cookies’ sections below for further information.

**If you register on our website:** your name, email address, address and phone number and any other information you may provide to us in the course of registering on our website.

**If you email us:** your name, email address and any other information contained within your email.

**If you mail us:** your name, mailing address, and any other information you provide in the letter.

**If you call us:** your name, phone number and any other information you provide us.

**If you contact us via social media:** your name, social media account username, date of birth, occupation, address and any other information publicly available on your account or that you may choose to provide us.

Where it is lawful and practicable to do so, you may remain anonymous in your dealings with us.

If you provide the personal information of another person in any correspondence with us, you warrant that person has consented to the collection of their personal information for the reasons it is being collected.

### Sensitive information

Sensitive information is any information about a person’s racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information.

We will not ask you to disclose sensitive information to us. If sensitive information is disclosed to us, we will take reasonable steps to de-identify the data or destroy it where we can.

### How we collect personal information

We collect personal information in a variety of ways. We mainly collect information from you when you knowingly provide it to us including via signing up to our newsletter, signing up or contact us on our website.

We also collect personal information from our suppliers and resellers when they provide it to us as part of our commercial agreements.

We may also collect personal information about you from your representatives, including your spouse, business partner or professional adviser (where it is reasonable and practical to do so).

### Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information about individuals when it is necessary for us to carry on our business functions or to comply with laws.

We may collect, hold, use and disclose your personal information to answer your enquiry or to provide the information that you requested.

We may also collect, hold, use or disclose your personal information:

- to enable us to develop, administer and manage our services and business;
- to verify your identity;
- to customise service to better meet your needs and preferences;
- for statistical purposes;
- for future promotional and marketing purposes including direct marketing;
- for research purposes to better improve our websites or products;
- for other customer support purposes;
- to deal with complaints, queries or feedback; and
- when authorised or required by law.

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## Direct Marketing

We will not use or disclose personal information about you for direct marketing purposes unless you have consented to that kind of use or disclosure.

We may use your personal information for direct marketing purposes. If you do not wish to receive direct marketing communications from us please click on the 'unsubscribe' link in any email we send you and you will be removed from future communications. If you wish to know the source of the information being used, you may contact us via the Contact Us page on our website or using one of the methods set out below. We will respond to your request as soon as practicable.

## Information collected from and provided to third parties

Our website contains links to the websites of non-affiliated third party providers of our products and services ("Third Party websites").

If you have accessed any Third Party websites through our website, and if those third parties collect information about you, we may also collect or have access to that information as part of our arrangements with those third parties.

Where you access a Third Party website from our website, cookie information, information about your preferences or other information you have provided about yourself may be shared between us and the third party.

## Advertising and tracking

When you view our advertisements on a Third Party website, the advertising company may use 'cookies' and in some cases 'web beacons' to collect information on you such as:

- the server your computer is logged onto;
- your browser type;
- the date and time of your visit; and
- the performance of their marketing efforts.

When you access our website after viewing one of our advertisements on a Third Party website, the advertising company may collect information on how you utilise our website (eg which pages you view) and whether you complete an online application.

## Cookies

We use 'cookies' to provide you with better and more customised service and with a more effective website. When you access our website, you consent to our use of cookies as described in this policy and our website Terms of Use.

A 'cookie' is a small text file placed on your computer by our web page server. A cookie can later be retrieved by our webpage servers. Cookies are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your internet browser

We use cookies for different purposes such as:

- to allocate a unique number to your internet browsers;
- to customise our website for you;
- for statistical purposes;
- to identify if you have accessed a Third Party website; and
- for security purposes.

## Security of information

The security of your information is very important to us. We regularly review developments in security

and encryption technologies. Unfortunately, no data transmission over the internet can be guaranteed as totally secure.

We take all reasonable steps to protect the information in our systems from misuse, interference, loss, and any unauthorised access, modification or disclosure. If we no longer require your information, and we are legally permitted to, we will take all reasonable steps to destroy or de-identify the information.

We take reasonable steps to preserve the security of cookie and personal information in accordance with this policy. If your browser is suitably configured, it will advise you whether the information you are sending us will be secure (encrypted) or not secure (unencrypted).

## Do we disclose your personal information?

In the course of conducting our business we may provide your personal information to:

- our related companies;
- employees, contractors and subcontractors;
- an individual's representatives;
- government and regulatory authorities; and
- our professional advisers, including our lawyers, auditors and accountants.

We may disclose your personal information to third parties:

- to meet the purpose for which it was submitted;
- if we have your consent to do so or otherwise when we are authorised by law;
- if we are required by law to disclose the information.

We may disclose your personal information to our subcontractors or consultants when we engage third party service providers to undertake works as part of our service delivery to our customers.

We may exchange personal information with our contractors who provide services to Bankston including third parties who undertake internal business processes, including:

- mailing services;
- billing and debt recovery functions;
- marketing functions; and
- website, data management and technology services.

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## Overseas recipients

We do not generally disclose personal information obtained from cookies to overseas entities in the course of our activities.

We may disclose your personal information to overseas recipients where the overseas recipient provides services to us, such as SaaS (software as a service) or cloud-based storage solutions.

The countries in which such recipients are located will depend on the nature of the services being provided by us and the particular matter involved. We will, where practicable, advise you of the countries in which overseas recipients are likely to be located.

Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider. However, by providing us with your personal information, you consent to the storage of such information on overseas servers.

## Updating your personal information

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you can do so via the 'Update Profile' section of your profile, by contacting us via the Contact Us section on our website or by using one of the methods set out below.

We will generally rely on you to ensure the information we hold about you is accurate or complete.

We will correct your personal information at the time of your request if appropriate. Otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within 30 days

## Access and correction to your personal information

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time. We may charge an administrative fee for our costs of retrieving and supplying the information to you.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, where the information is stored on another entity's server and we do not have access to it, if the information relates to existing or anticipated legal proceedings, if your request is vexatious or if the information is commercially sensitive.

An explanation will be provided to you if we deny you access to the personal information we hold about you. If we refuse to correct personal information we will provide you with our reasons for not correcting the information.

We may require you to provide proof of or verify your identity if you want to access or correct your personal information that we hold. This verification of identity may occur over the phone, by email, video call or in person.

## Complaints

We are committed to the protection of your privacy and personal information. Complaints you may have about your personal information can be lodged with us by using the contact details below.

We will attempt to resolve any complaints within 10 working days. If resolution is not possible within this timeframe we will contact you to discuss the matter further.

## Contact details

You may contact us in one of the following ways:

Telephone: +61 (0)8 8362 1133

Email: [info@bankston.com](mailto:info@bankston.com)

Mail: Attention: Emily Bradley  
14 - 16 Stepney Street  
Stepney, SA, 5069

Website: using one of the methods described on the Contact Us page of our website

## Changes to this policy

This policy is subject to change over time without prior notice. We may amend this policy by updating this posting.

## Copies of this policy

You can ask us to provide you with a copy of this policy, including a hard copy, by contacting us using the contact details above.

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