



## Scope

This privacy policy outlines what kinds of personal information we collect, why we collect it, and how we use it.

Comprara Pty and our associated companies including Purchasing Index Pty (**Comprara**), are a specialist procurement consulting, assessment and training organisation. Working with a wide range of public and private sector organisations. Our services range from the delivery of assessment and training programs to leading organisational and sector procurement transformation programs.

## Introduction

We regard customer privacy as an important part of our relationship with our customers. The following privacy policy applies to all Comprara users and conforms to Internet privacy standards. If you have questions or concerns regarding this statement, you should first contact Benjamin Shute at (03) 8547 3940.

## What personal information do we collect?

The personal information that we collect depends on how you interact with us.

## Website visitors

We may collect non-identifying information in relation to your use of our website, including IP address, the type of browser you use, the files you request, and the domain name and country from which you request information, to monitor and improve the website and services we may provide.

Our website may use cookies to assist in making your browsing experience better and to allow us to improve the website. A 'cookie' is a small text file that allows our server to identify and interact more effectively with your computer. The website may also store cookies on your web browser in order to improve service for you on your subsequent visits to the website. To track usage more generally, we may use third parties to collect statistical data via cookies.

## Customers

If you are our customer or a user of any of our customer portals, we may collect and hold personal information relevant to providing you with the services, such as your name and contact details including email address, phone number, or other relevant information.

We also collect and retain various contact details (name, address, telephone, email, etc.) of any current or prospective customers for marketing purposes.

The information required by our dashboard and analytics services is mostly procurement spend, however this could at times include personal information such as employee names, individual vendor details, addresses etc. This personal information is used and stored for the purpose of developing and presenting back analysis of data. We can deliver the dashboard services without any personal information at the request of the customer and their acceptance that some functionality will be limited as a result.

The personal information you provide may be also be used by Comprara to:

Provide your Skills Gap Test and Training Needs Analysis results to your employer, where your employer contracts with Comprara to deliver a Procurement Maturity Profile,  
Compile an employer-requested list of those persons in their employment who have registered for the Skills Gap Test and Training Needs Analysis and their completion status  
Aggregate and use for internal review to analyse trends and statistics  
Process your registration and record your profile information  
Customise future service offerings, such as procurement training

## Use and disclosure

We use and disclose your personal information only to fulfil the purpose for which it is collected.

We will only disclose your personal information to our service providers who assist us in operating the website and providing services to you. We will only disclose personal information to an unrelated third party with your consent.

## Data Retention

We will retain your personal information for as long as we require it for our purposes or as required under law. When we no longer require it, we will destroy or de-identify the personal information.

## Storage of Collected Information

The security of your personal information is important to us. When you enter sensitive information (such as credit card numbers) on our website, we encrypt that information using secure socket layer technology (SSL). When Credit Card details are collected, we simply pass them on in order to be processed as required. We never permanently store complete Credit Card details. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. If you have any questions about security on our Website, you can email us at [info@comprara.com.au](mailto:info@comprara.com.au)

## Communications

Comprara uses personally identifiable information for essential communications, such as Emails, accounts information, and critical service details. We may also use this information for other purposes, including some promotional Emails. If at any time a customer wishes not to receive such correspondence, they can request to be removed from any mailing lists by emailing us at [info@comprara.com.au](mailto:info@comprara.com.au). You will be notified when any third party that is not our agent/service provider collects your personal information, so you can make an informed choice as to whether or not to share your information with that party.

## Access and correction

You may access and correct the personal information we hold about you, upon making a written request. We will respond to your request within a reasonable period. We may charge you a reasonable fee for processing your request (but not for making the request for access and/or correction).

## Orders

If you purchase a product or service from us, we may request certain personally identifiable information from you. You may be required to provide contact information (such as name, Email, and postal address) and financial information (such as credit card number, expiration date). We use this information for billing purposes and to fill your orders. If we have trouble processing an order, we will use this information to contact you.

## Service providers

We transfer your personal information to service providers in other countries for the purpose of hosting the website and providing services to you. These service providers may be located in the Australia, Hong Kong, New Zealand, Singapore, United States of America and other countries from time to time.

Comprara may at its discretion use other third parties to provide essential services on our site or for our business processes. We may share your details as necessary for the third party to provide that service. These third parties are prohibited from using your personally identifiable information for any other purpose. Comprara does not share any information with third parties for any unknown or unrelated uses.

## Legal

We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on our Website.

## Links

Links on the Comprara site to external entities are not covered within this policy. The terms and conditions set out in this privacy statement only cover the domain name of [www.comprara.com.au](http://www.comprara.com.au)

## Changes to Privacy Policy

If we decide to change our privacy policy, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by Email, or by means of a notice on our homepage.

## Collection of Information

In order to use the Comprara website, we may require information from you in order to provide the best service possible. All correspondence may also be collected and stored, particularly in regard to sales, support and accounts, including Email. Any information collected by Comprara is collected via correspondence from you or your company. This may be via the telephone, Email, mail, fax or directly through our website.

## Use of Collection Information

Any details collected from Comprara customers are required in order to provide you with our products and/or services, and a high level of customer service. Correspondence is recorded in order to provide service references, and to assist in our staff development.

## Access to Collected Information

If your personally identifiable information changes, or if you no longer desire our service, you may correct, update, delete or deactivate it by emailing us at [info@comprara.com.au](mailto:info@comprara.com.au).

## Third Parties

Comprara may at its discretion use other third parties to provide essential services on our site or for our business processes. We may share your details as necessary for the third party to provide that service. These third parties are prohibited from using your personally identifiable information for any other purpose. Comprara does not share any information with third parties for any unknown or unrelated uses.

## Compliance with privacy law

We shall comply with the privacy law of your jurisdiction. The Privacy Act 1988 (Cth) governs the handling of personal information in Australia. If you are located in another jurisdiction then additional requirements shall apply. If your personal information is governed by the European Union General Data Protection Regulation (GDPR) then you may have the following additional rights;

- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- Request restriction of processing of your personal information.
- Request the transfer of your personal information to you or to a third party.
- Withdraw consent at any time where we are relying on consent to process your personal information.

## Complaints

In the event that you wish to make an enquiry or complaint about how your personal information is being handled, please contact our Data Protection Officer using the details listed below. In the event you wish to complain about how your enquiry or complaint has been handled, you have the right to lodge a complaint directly with our Supervisory Authority using the details listed below.

## Data Protection Officer:

**Name:** Milan Panchmatia  
**Address:** Level 6, 365, Lt Collins Street, Melbourne, Victoria 3000, Australia  
**Email:** [milan@comprara.com.au](mailto:milan@comprara.com.au)  
**Phone:** [+61 3 8547 3940](tel:+61385473940)

## Supervisory Authority:

**Name:** Ben Shute  
**Address:** Level 6, 365, Lt Collins Street, Melbourne, Victoria 3000, Australia  
**Email:** [milan@comprara.com.au](mailto:milan@comprara.com.au)  
**Phone:** [+61 3 8547 3940](tel:+61385473940)