DRAFT FOR LEGAL REVIEW · 5 November 2026. Prepared for review by Star Print Solutions' solicitor before publication. Not yet in force.

Note for the solicitor

Star Print Solutions Pty Ltd is a print management business. It arranges commercial print, direct mail stock, promotional products and packaging for business, charity and government clients through independent printers and suppliers. It deals almost entirely with businesses, not consumers. This draft is based on the following facts provided by the director, which should be confirmed:

Personal information is collected through the website Contact Us form (which currently opens the visitor's email program), enquiries and orders, credit account applications, trade references and credit reports.

The credit account application collects details of directors, owners, partners, trustees and guarantors, including name, position, date of birth, residential address and mobile number, and includes consent to obtain commercial and consumer credit reports.

Star Print Solutions does not store clients' bank account or card details. Invoices and payments are processed through Xero (xero.com).

The website is a single-page site that loads fonts from Google Fonts and is not believed to use analytics or advertising cookies.

Security interests may be registered on the PPSR.

Points for your advice:

1. Whether Star Print Solutions is an APP entity, or is covered by the small business exemption but bound by the credit reporting provisions (Part IIIA) as a credit provider.
2. Whether a separate credit reporting policy is required under section 21B, or section 9 of this draft is sufficient.
3. The credit reporting bodies to be named in section 9 (shown as a placeholder).
4. The overseas disclosure statement in section 7, including where Xero and the email and cloud providers store data.
5. The retention period in section 10 (7 years drafted).
6. Whether the collection notice in the Credit Account Application (Credit Conditions clause 7) and Terms and Conditions clause 10.4 are consistent with this policy.
7. Any changes needed in light of the Privacy and Other Legislation Amendment Act 2024, including the statutory tort for serious invasions of privacy.

Privacy Policy

Star Print Solutions Pty Ltd ABN 43 600 127 759 · PO Box 247, Five Dock NSW 2046 · 1300 251 535 · david@starprintsolutions.com.au

1. About this policy

This policy explains how Star Print Solutions Pty Ltd (**we**, **us**, **our**) collects, uses, holds and discloses personal information, and how you can access or correct it or make a complaint. We comply with the Privacy Act 1988 (Cth), the Australian Privacy Principles and credit reporting requirements to the extent they apply to us.

2. The information we collect

We collect only the personal information we need to quote for, supply and invoice work and to manage client accounts. This may include:

Contact details: names, positions, business addresses, phone numbers and email addresses of client staff, suppliers and other contacts.

Enquiry and job details: information you send us about a job, including in briefs, artwork and files.

Credit account details: for directors, owners, partners, trustees and guarantors, their name, position, date of birth, residential address and mobile number, and details of trade references. If we need to confirm an individual's identity for a PPSR registration, we may sight their driver's licence to confirm their name and date of birth. [Confirm whether licence numbers or copies are kept.]

Credit information: commercial credit information about corporate applicants, and information from trade references, as described in section 9.

We do not collect or store bank account or card details. Invoices and payments are processed through Xero (xero.com), which handles that information under its own privacy policy.

We do not collect sensitive information, such as health information, unless required by law.

3. How we collect it

We collect personal information:

through the Contact Us link on our website, which opens your email program so you can email us when you contact us by phone or email, request a quote or place an order;

from credit account applications and guarantees;

and from trade references and, for corporate applicants, commercial credit reporting bodies; and

from public sources, such as the ASIC and ABN registers.

Where practical, we collect information directly from you. You may make a general enquiry without giving your name, but we cannot quote for or supply work, or open an account, without the information we ask for.

4. Our website

Our website does not use analytics or advertising cookies. It loads fonts from Google Fonts, which means your browser's IP address is sent to Google when you visit. Information you enter in the Contact Us form is sent to us by email and handled as described in this policy.

5. How we use it

We use personal information to:

respond to enquiries, prepare quotes and manage jobs;

assess credit applications and manage accounts, including collecting amounts owing;

register and manage security interests on the Personal Property Securities Register (PPSR);

and send you information about our services in accordance with the Spam Act 2003 (Cth), which you can opt out of at any time; and

meet our legal obligations, including tax and record-keeping.

6. Who we disclose it to

We disclose personal information only as needed for the purposes above, to:

printers, suppliers, mailing houses and carriers, to the extent needed to complete your job;

Xero and our email, file storage and IT service providers;

commercial credit reporting bodies and trade references, as described in section 9;

the PPSR, when we register a security interest;

our accountants, lawyers, insurers and debt collectors; and

government agencies, where required or authorised by law.

We do not sell personal information.

7. Overseas disclosure

[Drafting direction: insert the actual overseas arrangements once confirmed (memo Part 8, item 3). Identify likely overseas recipients and, where practicable, their countries. Do not publish example countries or unverified assurances about provider compliance.] Some of our service providers may store or access personal information outside Australia, including in [countries to be confirmed].

8. Direct marketing

We may send you information about our services if you are a client or have asked us to. Every marketing email includes a way to unsubscribe, or you can contact us to opt out.

9. Credit information

We may obtain commercial information about a corporate applicant and contact the trade references it provides to assess and manage its account. Under this model, we do not obtain personal credit reports about directors, owners or guarantors, or report payment defaults about individuals to credit reporting bodies. If that practice changes, we will first implement the applicable legal requirements and update our documents.

10. Security and retention

We hold personal information in secure electronic systems with access controls, and in locked storage for paper records. We keep financial records, such as invoices, statements and payment records, for 7 years after the transactions they cover are completed. We keep signed credit applications and guarantees for as long as we may need them for a claim (ordinarily 6 years after the account closes, or 12 years for a deed). We keep PPSR records while a registration is active and for the period needed for related claims. We review enquiries and quotes that did not proceed after 2 years. When we no longer need information for a permitted purpose, and the law does not require us to keep it, we securely destroy or de-identify it. We have a data breach response procedure. If a data breach is likely to result in serious harm, we will act promptly to contain it. We will notify affected individuals and the Office of the Australian Information Commissioner where the Notifiable Data Breaches scheme applies to us. [Confirm coverage: memo Part 5.4.]

11. Access and correction

You can ask for access to the personal information we hold about you, or ask us to correct it, by contacting us using the details below. We will respond within 30 days. We do not charge for a request but may charge a reasonable fee for providing access. If we refuse a request, we will tell you why in writing.

12. Complaints

If you have a concern about how we have handled your personal information, please contact us first. We will acknowledge your complaint within 7 days and aim to resolve it within 30 days. If you are not satisfied with our response, you can contact the Office of the Australian Information Commissioner at oaic.gov.au or on 1300 363 992.

13. Contact us

Privacy Officer: David Flynn, Director

Star Print Solutions Pty Ltd · PO Box 247, Five Dock NSW 2046

Phone 1300 251 535 · Email david@starprintsolutions.com.au

14. Changes to this policy

We may update this policy from time to time. The current version is available on request and will be published on our website. It is linked from our Credit Account Application and Terms and Conditions of Trade. [Drafting note: if a computer program is used to make, or substantially and directly assist in making, decisions that could significantly affect an individual (for example, credit scoring), add the disclosures required by APP 1.7 to 1.9, which commence on 10 December 2026.]