

PRIVACY POLICY

Purpose

This privacy policy applies to KENNETH AYRES (AUST.) PTY. LTD. (ABN 94 005 724 489) of 175 Henty Street, Reservoir VIC and any related entities (as defined in the Corporations Act 2001) (“**KAA**”) in relation to its operations in Australia.

KAA takes seriously its commitment to preserve the privacy of personal information collected by it. This policy explains how KAA handles personal information and complies with the requirements of the Act in an open and transparent manner.

If you have any further questions in relation to this policy, please contact KAA by writing to KAA at:

*Kenneth Ayres (Aust) Pty Ltd
175 Henty Street
Reservoir VIC 3073*

Alternatively, you can email KAA at sales@ayres.com.au

Exclusions

This policy relates to KAA’s collection and handling of personal information that is covered by the Privacy Act. It is not intended to cover categories of personal information that are not covered by the Privacy Act.

Privacy Policy

1. Collection of Personal Information

KAA collects and holds personal information from customers, employees, contractors and other individuals. We collect and hold this information only when it is necessary for business purposes. We do not collect personal information if there is no need for it, or for the purposes of unlawful discrimination.

The main types of personal information that KAA collects and holds relate to the contact details and organisational roles of our customers, suppliers and other business contacts. Typically, this information includes:

- names;
- addresses;
- telephone numbers;
- e-mail addresses; and
- job titles.

In the course of providing professional goods to our customers, we may collect and hold more detailed personal information from time to time (for instance financial details or credit information).

We collect most information directly from individuals when we deal with them. The personal information we collect may also be provided in forms filled out by individuals, face-to-face or video/teleconference meetings, email messages, telephone conversations or by third parties. If you contact us, we may keep a record of that contact.

Because of the nature of our business, it is generally impracticable for us to deal with individuals on an anonymous basis or through the use of a pseudonym, although sometimes this is possible (for example, when seeking staff or customer feedback generally).

2. Use of Personal Information

The main purposes for which we collect, hold and use personal information are:

- to provide our goods;

- to respond to a request by an individual;
- to maintain contact with customers;
- to keep customers and other contacts informed of the goods we offer and industry developments that may be of interest to them and to notify them of particular offerings or other events we are holding;
- for general management and reporting purposes, such as invoicing and account management;
- for recruitment purposes;
- for purposes related to the employment of our personnel and providing internal goods and services to our staff; and
- other purposes related to our business or the business of any related entities.

If an individual or customer chooses not to provide us with personal information, we may be unable to do the things listed above.

We may collect, hold and use personal information about individuals to market our goods, including by email. However, individuals always have the opportunity to elect not to receive further marketing information from us by writing to or emailing us. Please allow a minimum of 28 days for your request to be processed.

Alternatively, if we have contacted you by email, you may reply to that email to notify us that you do not want to receive further marketing information from us by email.

If we collect, hold or use personal information in ways other than as stated in this policy, we will ensure we do so pursuant to the requirements of the Privacy Act.

Employee records are not generally subject to the Privacy Act and therefore this policy may not apply to the handling of information about employees by KAA. For information about our practices relating to employee information, please contact us directly.

3. Disclosure of Personal Information

KAA does not routinely disclose personal information to other organisations unless:

- use or disclosure is permitted by this policy;
- we believe it is necessary to provide you with a product or service which you have requested (or, in the case of an employee or contractor of KAA, it is necessary for maintaining or related to your role at KAA);
- to protect the rights, property or personal safety of any member of the public or a customer of KAA or the interests of KAA;
- some or all of the assets or operations of KAA are or may be transferred to another party as part of the sale of some or all of KAA’s business;
- you give your consent; or
- such disclosure is otherwise required or permitted by law, regulation, rule or professional standard.

We may also share non-personal, de-identified and aggregated information for research or promotional purposes. Except as set out in this policy, we do not sell to or trade personal information with third parties.

KAA uses a range of service providers to help us maximise the quality and efficiency of our goods and our business operations (including internal

business requirements, such as recruitment and human capital requirements). This means that individuals and organisations outside of KAA will sometimes have access to personal information held by KAA and may collect or use it from or on behalf of KAA. This may include, but is not limited to:

- independent contractors and consultants;
- travel service providers;
- off-site service providers;
- information technology providers;
- event managers;
- credit managers; and
- debt collecting agencies.

We require our service providers to adhere to our privacy guidelines and not to keep, use or disclose personal information we provide to them for any unauthorised purposes.

If KAA staff or contractors obtain products or goods and services offered by a third party pursuant to an agreement or arrangement between that third party and KAA, such as a credit card provider, we may provide your personal information to that third party, including information that relates to your use of such goods and services.

4. Disclosure to Overseas Recipients

As at the date of this policy, KAA carries out its business predominantly in Australia, however, our customer's or contractors may from time to time be part of global networks.

Accordingly, where KAA exchanges information with customers or contractors, including personal information, we may transfer personal information outside Australia to countries whose privacy laws do not provide the same level of protection as Australia's.

Customers or contractors with which we exchange information may also use overseas facilities or other contractors to process or back-up our information or to provide certain goods and services to us.

As a result, we and/or our contractors may transfer your personal information to our overseas facilities or other contractors for these purposes.

However, any such transfer of information does not change any of our commitments to safeguard your privacy and the information remains subject to existing confidentiality obligations.

5. KAA Websites and/or Applications

This policy also applies to any personal information we collect via our website at www.ayres.com.au and any applications including mobile applications.

In addition to personal information you provide to us directly (such as where you make a request or complete a registration form), KAA may also collect personal information from you via its applications and websites.

Website Cookies

Cookies are uniquely numbered identification numbers like tags which are placed on your browser. By themselves cookies do not identify you personally, but they may link back to a database record about you.

If you register on our site we will then link your cookie back to your personal information details.

This site uses cookies to monitor usage of our website to create a personal record of when you visit our website and what pages you view. Cookies are necessary to enable statistical reporting of activity on our web site, but if you do not wish us to retain any information about your visit to our site you could delete the cookies on your browser and change the settings on your web browser program.

Our website uses session cookies during a search query of the website and when an individual accesses our pages. Our Internet service provider does not employ cookies on our website except in those circumstances. The

website statistics for this site are generated from the server logs as outlined above.

Third Party Web Links

Because KAA wants your user experience to be as informative and resourceful as possible, we may from time to time provide links to websites operated by third parties. KAA is not responsible for the privacy practices or policies of those sites. We encourage you to review each website's privacy policy, especially if you intend to disclose any personal information via that site. A link to another non-KAA website is not an express or implied endorsement, promotion or warranty of the products or goods and services offered by or accessible through that site or advertised on that site.

6. Security of Personal Information

Depending on the purpose for which we have collected personal information (for example, an enquiry via our website enquiries form) we may store some of the information electronically. Some or all of this personal information may be available to authorised staff and contractors of KAA for use in accordance with this policy.

KAA will endeavour to take all reasonable steps to keep secure any information which we hold about you, whether electronically or in hard-copy, and to keep this information accurate and up to date. We also require our employees and contractors to respect the confidentiality of any personal information held by KAA.

KAA aims to achieve industry best practice in the security of personal information which it holds. It is our policy not to gather or retain personal information once there is no longer a legal or business need for us to do so.

7. Access to Personal Information

We will provide access to personal information upon request by an individual, except in the limited circumstances in which it is permitted for us to withhold this information (for instance, where granting access would infringe another person's privacy).

When you make a request to access personal information, we will require you to provide some form of identification (such as a driver's licence or passport) so we can verify that you are the person to whom the information relates. In some cases we may also request an administrative fee to cover the cost of access.

If at any time you want to know what personal information we hold about you, you may contact us by emailing us at sales@ayres.com.au

8. Corrections & Complaints

If you believe that information we hold about you is incorrect or out of date, or if you have concerns about how we are handling your personal information, please contact us and we will try to resolve those concerns.

If you wish to have your personal information deleted, please let us know and we will take reasonable steps to delete it (unless we need to keep it for legal, auditing or internal risk management reasons).

If KAA becomes aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address these concerns.

If you have any further queries relating to our privacy policy, or you have a problem or complaint, please contact us. If you are not satisfied with our handling of your problem or complaint you may make a complaint to the Australian Information Commissioner.

9. Effect of Policy

KAA operates in a dynamic business environment and we aim to review this policy annually to keep it current.

KAA may update this privacy policy at any time by publishing an updated version on its website at www.ayres.com.au. Any amended or updated policy will apply between us whether or not we have given you specific notice of any change.