

1 PRIVACY POLICY

W. W. Wedderburn Pty Limited (ABN 25 003 501 853) and its related companies (together we, us, our and other similar expressions) are committed to protecting your personal privacy. This Privacy Policy tells you how we collect, store, use and disclose your personal information. 'Personal information' is information which identifies you or from which you are identifiable. We encourage you to read this policy carefully so that you understand how we deal with that information.

OUR PRIVACY PRINCIPLES

We are bound by the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth). We have adopted internal policies and procedures to ensure that personal information that we collect, store, use and disclose is dealt with in accordance with the APPs. You can see the full text of the APPs online at www.oaic.gov.au/privacy/.

INFORMATION WE COLLECT

In order to provide our customers with our products and services, we may collect and use personal information about them. If we are not provided with all the personal information we request:

- we may not be able to supply our products and services to you,
- you or your organisation may not be able to participate in future offers of goods or services which we supply; and
- we may not be able to assess a request for credit or deferred payment terms, establish an account or increase your credit limit.

The type of information we collect includes names, addresses, age, date of birth, email addresses, credit card details (if you buy products or services from us) and other contact details. We may also collect details of directors, officers and senior management staff of a customer, the names of employees, the name of the contact person at your bank or financial institution, along with transactional information such as the type and quantity of products that you purchase or own, records of your communications and interactions with us and details of your behaviour relating to transactions, products, services and activity with our digital services and other personal information about you.

We do not normally collect or store 'sensitive information', as defined in the *Privacy Act 1988* (Cth) (eg information about ethnic origin, religious beliefs or health). However, where we are required to and able to do so, we will ask for your consent before collecting your sensitive information and let you know the purpose at the same time.

COLLECTION OF CREDIT INFORMATION

If you are a customer and we give you credit, we may also collect credit information or credit eligibility information about you. Credit information and credit eligibility information are types of personal information.

The credit information and credit eligibility information we may collect about you includes:

- identification information;
- credit liability information;
- repayment history information;

- details of any request for your information that we receive from a credit provider, mortgage insurer or trade insurer;
- the type and amount of credit sought by or provided to you;
- default information (including overdue payments);
- payment information;
- court proceedings information;
- personal insolvency information;
- information about any serious credit infringement by you;
- information disclosed in reports obtained from credit reporting bodies;
- information from property searches; and
- information provided by trade references.

We generally collect your credit information or credit eligibility information directly from you, for example, if you complete our credit application.

We may also collect credit information or credit eligibility information about you from third parties, for example from any organisation with whom you have any dealings, credit reporting bodies such as Creditor Watch Pty Ltd and Equifax Australia Information Services and Solutions Pty Limited, or from publicly maintained records.

We collect, use and disclose credit information and credit eligibility information about you to assess whether to extend credit to you or to a customer (if you have given a personal guarantee in respect of that customer).

If permitted under the *Privacy Act 1988* (Cth), we may disclose credit information or credit eligibility information about you to any organisation with whom you have any dealings, credit reporting bodies, creditors, other traders in the markets we trade in, our commercial customers, our suppliers and retailers of our products.

HOW WE COLLECT PERSONAL INFORMATION

Generally, we collect your personal information from you. For example, we may collect information from you when you complete our credit application or provide a personal guarantee, or when you provide us with information, whether in person, by telephone, online or in writing, including if you make an enquiry online through our website. If you submit an order (including by telephone or online), we will collect information necessary to fulfil that order.

We may also collect your personal information where you interact with us through our social media pages, when you participate in our contests or competitions. However, we may also collect personal information about you, including your credit information or credit eligibility information, from someone other than you - for example from any other organisation with which you have had dealings or which you have nominated to act as trade referee, from a credit reporting body or from publicly maintained records, from publicly available sources, information service providers or anyone authorised to act on your behalf, or from our agents, employees, subcontractors, suppliers and services providers.

HOW WE STORE PERSONAL INFORMATION

We take all reasonable steps to keep secure any personal information which we hold about you and to protect your personal information from loss, misuse or unauthorised alteration. Any personal information you provide to us is stored on secure servers. Access to personal information is limited to our employees who specifically need it to carry out their business responsibilities. We also

maintain physical security procedures to manage and protect the use and storage of records containing personal information.

PURPOSE OF COLLECTION

We collect, hold, use and disclose personal information so we can:

- meet our legal obligations;
- identify our customers, potential customers and their representatives;
- provide our products and services or other benefits to you, including fulfilling an order;
- communicate with you and to answer any query from you;
- inform you of any initiatives we think may be of interest to you;
- inform you about our products and services and the benefits of using our products and services;
- provide you with information about offers or other benefits that may become available;
- process survey results and other data you provide;
- process contest or competition entries;
- consider applications for employment;
- seek your opinion or comments about our products and services;
- carry out billing and debt recovery activities;
- carry out our management, administrative, quality assurance and complaint handling activities in a professional and efficient manner;
- develop and implement initiatives to improve our products and services;
- register security interests on the Personal Property Securities Register;
- assess your (or your organisation's) request for credit or deferred payment terms or interact with you as guarantor;
- conduct credit checks via third party credit reporting bodies and assess your creditworthiness;
- manage your account and fulfil our obligations to you or your organisation;
- enforce our rights when you are in breach and recover monies owing to us from time to time;

and for other secondary purposes.

COLLECTION REQUIRED BY LAW

Collection of some personal information about you may also be required or authorised by or under an Australian law. These laws include:

- the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), which requires us to collect personal information about you when verifying your identity;
- the National Consumer Credit Protection Act 2009 (Cth), which requires us to make inquiries about you when assessing an application for credit by you; and
- the Personal Property Securities Act 2009 (Cth), under which we may need to collect personal information about you to record a security interest on the Personal Property Securities Register.

DISCLOSURE

We usually disclose the personal information we collect to our related entities, service providers and contractors that help us supply our products and services. For example, we may disclose the personal information we collect to our information technology providers, providers of marketing and promotional services, professional advisers such as legal practitioners and accountants, debt collectors and insurers.

Except as indicated above, we will not disclose your personal information to a third party unless:

- you have consented to the disclosure;
- the third party is our service provider or contractor, in which case we will require them to use and disclose the personal information only for the purpose for which it was provided to them;
- the third party is a person involved in a dealing or proposed dealing (including a sale) of all or part of our assets and business;
- the third party is a credit reporting agency, such as Creditor Watch Pty Ltd and Equifax Australia Information Services and Solutions Pty Limited, your creditor, banker or financier, or other credit providers and insurers;
- the third party is your guarantor or someone who provides security for credit to you;
- debt collectors and assignees of your debts;
- a recognised external dispute resolution scheme of which we are a member;
- our professional advisors, including our lawyers, auditors and accountants;
- the disclosure is to a related entity; or
- the disclosure is permitted, required or authorised by or under law.

MARKETING

We may use personal information to advise you of new products and marketing initiatives that we think may be of interest to you. This may include product or service offerings, newsletters and general information about us.

If you prefer not to receive information about our products and services, you can ask to be removed from the relevant circulation list by contacting us at the contact details listed below or by selecting the 'opt out' or 'unsubscribe' link, or follow the opt out instructions that may be included in any of our communications with you.

We never disclose personal information to a third party for the purpose of allowing them to direct market their products or services to you, unless you have expressly consented to that disclosure.

ACCESS

If at any time you want to know what personal information we hold about you, you are welcome to request access to that information by contacting us at the contact details listed below. However, we may deny your request for access where

- the access impacts on the privacy of others;
- the request for access is frivolous or vexatious;
- there are existing or anticipated legal proceedings; or
- the access can be denied under law or by a law enforcement agency.

If we deny your request for access, we will let you know why. We may also charge a fee to cover the reasonable costs we incur in processing your request.

QUALITY AND CORRECTION

We always try to make sure that the information we hold about you is accurate, complete and up-to-date. If at any time you believe the personal information that we hold about you is incomplete or inaccurate, please let us know. We will use all reasonable efforts to correct the information.

WEBSITE ANALYTICS AND COOKIES

To ensure we are meeting the needs and wants of our website users, and to develop our online services, we use a range of tools provided by third parties, including Google Analytics, which collect website traffic and usage information. The providers of these tools have their own privacy policies. Details about how Google uses information about your use of our website can be found [here](#). If you would like to prevent information about your use of our website being used by Google, you can download a browser add-on from Google [here](#).

We also use cookies and session tools to improve your experience when accessing our website. We use the information to maintain, secure and improve our websites and to enhance your experience when using them.

Cookies are unique identification numbers like tags that are placed on the browser of our website users. These cookies are used to retain login and location information in order to make your experience more convenient and personal. The kind of information we may collect includes:

- the date and time you access our website;
- your internet service provider, mobile carrier, or data services provider;
- your Internet Protocol (IP) address;
- location information or Global Positioning System (GPS) information sent to us by your GPS-enabled device;
- the pages you visit;
- the links you click;
- the features you use;
- how and when you interact with the services;
- the content, images and advertisements you select; and
- how you arrived at the products and where you go when you leave.

We use the information collected by these cookies to:

- help identify you as you access and move around our website;
- identify items in your shopping basket;
- keep track of your current order; and
- provide site usage information which, together with purchasing information, will help us improve and develop the products and services we offer.

Most browsers and display software can be set to inform you when cookies are being used or other tracking software is being sent to your computer, mobile or other device. They also provide you with the option of refusing those cookies and tracking software. However, refusing to allow the use of cookies and tracking software may, in some cases, preclude you from using, or negatively impact the display or function of, certain areas or features of our services, including preventing you from buying products or acquiring services from us. You will need to enable cookies to use our website to register your details and to make purchases.

CHANGES TO THIS POLICY

As our business evolves, our business processes and policies will be reviewed and may be amended. We may change this policy at any time. We will notify you of any change by posting an updated version of the policy on our website. Please be aware that it is your responsibility to check our website and make sure you keep up-to-date with any changes to this policy.

COMPLAINTS

We are committed to constantly improving our procedures so that your personal information is treated appropriately. If you feel that we have failed to deal with your personal information in accordance with this policy or the APPs, please contact us at the contact details listed below so we have an opportunity to resolve the issue to your satisfaction.

Our privacy officer will:

- listen to your concerns and grievances;
- discuss with you the ways in which we can remedy the situation; and
- put in place an action plan to resolve your complaint and improve our information handling procedures if appropriate.

DISCLOSURE TO OVERSEAS RECIPIENTS

We use some cloud services which store personal information in the USA. Otherwise, we are not likely to disclose personal information to overseas recipients.

CONTACT US

If you require more detailed information about how we deal with personal information or if you have any concerns about how we have dealt with your personal information, please let us know by contacting us at:

Privacy Officer
W. W. Wedderburn Pty Limited
Email: privacy@wedderburn.com.au
Phone: 1300 933 337

We will aim to respond to your concerns as quickly as possible.



Stuart Wedderburn
Director