

## **PRIVACY POLICY**

This is the privacy policy of Spinks Group Pty Ltd A.C.N 140 306 609 ("the Company"). The Company may be referred to as "We", "our" and "us" in this Privacy Policy. It is the Company's intention to manage personal information in an open and transparent way and in accordance with the Australian Privacy Principles.

This Privacy Policy relates to the collection and use of personal information that may be collected by or supplied to us. This Privacy Policy is in addition to any other terms and conditions applicable to the Company, including any terms that may be listed on our website. The Company reserves the right to modify or amend this Privacy Policy at any time, in its absolute discretion.

The Company takes its obligation to protect the privacy of information collected about its customers seriously and in particular information that is capable of identifying an individual ("personal information"). This Privacy Policy regulates the way in which your personal information will be dealt with,

### **Personal Information**

1. Personal information is collected only when knowingly and voluntarily submitted. For example, we may need to collect personal information from you to establish an account with the Company or for warranty matters relating to our products and services. We will not collect information that is not necessary to sell you products, provide warranties or open a customer account but we may also need to collect information to allow us to undertake credit or reference checks for certain customers.

### **Use of Information**

2. Personal information that you provide us is used only for the purpose for which it is submitted or for such other secondary purposes that are related to the primary purpose, unless we disclose other uses in this Privacy Policy or at the time of collection.
3. We will use the personal information we collect to:
  - a. Assess any application by you for credit with the Company.
  - b. To collect payments that are owing to us.
  - c. In relation to any warranty claims on products or services offered by the Company.

### **Collecting information**

4. We will not collect information that is not necessary to sell you our products and services or to meet your requirements as advised to us.

5. We do not store credit card information.

### **Disclosure**

6. There may be circumstances where we are permitted or required to use or disclose your personal information. This may include your name, business name, number, address and/or email address. Such disclosure may include circumstances where:-
  - a. Disclosure to a law enforcement agency is required for purposes relating to investigation or enforcement of criminal and other the Company;
  - b. Use or disclosure to assist in the recovery of lost or stolen equipment;
  - c. Use or disclosures in accordance with an order made by a Court, a subpoena or otherwise authorised or compelled by law;
  - d. Use or disclosure to lessen or prevent serious threats to an individual or the public's health and safety;
  - e. It is necessary to assist in investigations into suspected fraud or criminal activities.
7. We may also disclose your personal information to other suppliers for the purposes of providing the Services to you or in order to facilitate the resolution of a dispute
8. We may engage third parties to provide you with goods or services on our behalf. In that circumstance, we may disclose your personal information to those third parties in order to meet your request for goods or services. We will not do this unless it is necessary.
9. In some instances, your personal information may be disclosed to our service providers overseas.
10. If we sell, transfer or assign our business, your information may be disclosed to any prospective purchaser as part of that transaction.

### **Marketing**

11. The Company does not usually engage in email marketing. However, the Company may use your email address to send material which may be:
  - a. Relevant to your product or service obtained from Us.
  - b. Material for promotional or marketing purposes or seeking your feedback
  - c. To advise you of other products or services that may be of interest to you.
12. You consent to us sending such communication and acknowledge that it may, in some circumstances, amount to 'commercial electronic messages' for the purposes of the *Spam Act 2003* (Cth). You may withdraw or unsubscribe from these messages at any time by emailing us.

### **Security**

13. We strive to ensure the security, integrity and privacy of personal information collected by Us. We review and update our security measures in light of current technologies.

Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure.

14. However, we will endeavour to take all reasonable steps to protect any personal information you may transmit to us. Once we do receive your transmission, we will also make our best efforts to ensure its security on our systems.
15. Our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us. However, we will not be held responsible for events arising from unauthorised access to your personal information.
16. We may hold your personal information in a number of ways, including on our system or database but it may also involve storing data on storage or systems managed by third parties. Accordingly, some of this information may be stored overseas. Our third party provider has the capacity to comply with the General Data Protection Regulation (EU) 2016/679 where compliance is required.

### **Collecting Information from Users**

#### 17. *IP Addresses*

Our web servers may gather your IP address to assist us to measure or improve our website and to assist with the diagnosis of problems or support issues with our services.

#### 18. *Cookies and Applets*

We may use cookies to provide you with a better experience. These cookies allow us to increase your security by storing your session ID and are a way of monitoring single user access. This aggregate, non-personal information is collated and provided to us to assist in analysing the usage of the site.

### **Access to Information (and right to correct)**

19. We will endeavour to take all reasonable steps to keep secure any information which we hold about you, and to keep this information accurate and up to date. If, at any time, you discover that information held about you is incorrect, you may contact us to have the information corrected.
20. In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us.

### **Links to other sites**

21. Where we provide links to Web sites outside of our web sites, as well as to third party Web sites, these linked sites are not under our control, and we cannot accept responsibility for the conduct of companies linked to our website. Before disclosing your personal

information on any other website, we advise you to examine the terms and conditions of using that Web site and its privacy statement.

22. In the event the Company uses social media such as Twitter, Facebook and YouTube to communicate with the public about the Company, or products or services, we may collect your personal information, but we only use it to help us to communicate with you and the public. We are not responsible for the privacy policies of social media services as they have their own.

#### **Problems, questions or complaints**

23. If we become aware of any ongoing concerns or problems with our web sites, 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 at [info@tjmproducts.com](mailto:info@tjmproducts.com).
24. For more information about privacy issues in Australia and protecting your privacy, visit the Australian Federal Privacy Commissioner's web site; <http://www.privacy.gov.au/>.