Privacy Policy

1. Our commitment to your privacy

MM Security Supplies Pty Limited ("**MMPL**", "**we**", "**us**" or "**our**") takes its privacy obligations seriously and is committed to protecting your personal information in accordance with the *Privacy Act 1988* (Cth) ("**Privacy Act**"), the Australian Privacy Principles set out in the Privacy Act ("**APPs**") and this privacy policy.

2. The kinds of personal information we collect and hold

"Personal information" means information or an opinion, whether true or not, which identifies you or from which your identity is reasonably identifiable. Some examples of personal information that we might collect include your name, residential or postal address, email address and phone number. We may also collect your date of birth, employment history, educational qualifications and income details, images and videos of you captured on our sites or locations by CCTV, government-related identifiers (e.g. tax file number and driver's licence information) and financial information.

We may also collect and hold sensitive information about you, including your membership with a trade union or professional association. We only collect sensitive information about you with your consent, or otherwise in accordance with the Privacy Act.

3. How we collect and hold your personal information

Where reasonable and practicable, we will collect your personal information directly from you. For example, we may collect your personal information from your creation of an account with us, your requests for quotes, your completion of an order form, your application for commercial credit, your interaction with our social media profiles, forums or blogs, your completion of our surveys or entry in our competitions or promotions, your registration for or attendance at our events, your registration of a product you have purchased from us or subscription to our services (including rebates or loyalty programs), your request to sign up to our newsletters, your attendance at our sites or locations, your application for prospective employment and contracting opportunities with us and from emails or telephone calls with us. We may also collect personal information that we request from you regarding your use of our services or that we collect automatically from your visits to our websites.

When we collect your personal information through our website, via promotions or our social media profiles, we will state that your personal information is being collected at the point of collection. We may collect your personal information on our website through click tracking, log files or cookies (which is detailed further below).

We may collect and hold personal information that has been collected from a third party or publicly available source. This will likely occur in instances where you have consented for this collection or you would reasonably expect us to collect your personal information in this way and it is necessary for us to collect this information for a specific purpose. A third party source includes wholesale and retail suppliers of home building, renovating and design related products or services where you have made inquiries about our products or services to those third parties. We may also collect your personal information from recruitment agencies, marketing agencies, labour hire providers, your employer, or medical, legal or financial service providers.

Unless it is impractical to do so or otherwise required by law, you have the right to not identify yourself or use a pseudonym. However, this may restrict our ability to deal with you and provide our services to you.

4. The purposes for which we collect, hold, use and disclose your personal information

As a general rule, we only collect and hold personal information which is relevant to our operations including, but not limited to, sales, marketing, administration and business development purposes.

We may collect, hold and use your personal information:

- to enable us to contact you in relation to the supply of our products and services and respond to your requests;
- to tailor our products and services to meet your needs, supply them to you and to meet our contractual obligations to you;
- to administer your account or notify you of changes or improvements to our products or services;
- to confirm your identity or authority to engage with us on behalf of another person;
- to provide you with access to protected areas of our website, assess the performance of our website and improve its operation;
- to manage the health, safety and wellbeing of you and our workforce and manage access to and security of our sites, equipment and locations;
- to comply with our legal and regulatory obligations;
- to contract with you and assess you for employment and contracting purposes;

- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- to assess credit applications, review existing credit terms, assess credit worthiness, collect overdue payments and assess credit guarantees (current and prospective);
- for our marketing, sales and business development purposes; and
- for any other purpose which is stated to you at the time of collection or that you otherwise authorise.

We will hold your information securely in either a physical form or in electronic form on our secure servers. We will take all reasonable steps to protect personal information against unauthorised access, modification, misuse, disclosure or loss through physical restrictions, encryption, authentication, firewalls and password protection for accessing electronic IT systems. If you provide paper-based documentation, we may retain the paper documents in addition to saving copies in an electronic format.

We will endeavour to ensure that our service providers have protection for electronic IT systems and other necessary restrictions, our staff are trained regarding security of personal information and their access is restricted where necessary, and will destroy and de-identify the personal information once it is no longer required.

We may disclose your personal information to:

- our employees, other personnel, related companies and affiliates;
- parties with whom we are in a joint venture or otherwise doing business with who need that information to conduct our business;
- administrators who assist in the administration of your account from time to time;
- third parties which assist us in providing our services but only if that disclosure is necessary to provide you with our services;
- market research companies who undertake customer surveys for us;
- industry bodies or buying groups of which you may be a member;
- insurance and finance companies, professional service firms (such as legal or accountancy services) and authorised third party providers of information assurance services;
- anyone that is notified to you at the time of collection or that you have given us permission to disclose it to or any person acting on your behalf; and
- where we are required or authorised by law to do so.

In the event that we transfer any personal information outside the MMPL group, we will contractually require the recipient of the information to protect your personal information.

5. Direct marketing

We may also use your personal information for purposes other than the primary purpose for which we collect it, including the purpose of direct marketing.

You consent to us providing your personal information to:

- third parties that have genuine and relevant products or services that we reasonably expect would be of interest to you or to whom you would reasonably expect us to disclose information as part of our service offering;
- organisations involved in distribution or administration for and on behalf of us or related bodies corporate; and
- as otherwise permitted or required by law.

You consent to us and such third parties directly marketing to you in order to inform you of our or their products and services.

You may withdraw your consent and opt out at any time by making a request to us (by emailing or calling our Privacy Officer, whose contact details are below. Alternatively, you can follow the steps to unsubscribe which are set out in the direct marketing communications. We will use reasonable endeavours to remove (and procure any third parties on our behalf to remove) your personal information from the direct mailing list within a reasonable period of time from receipt of the request.

6. Disclosure overseas

Customer information is stored in databases shared by the MMPL group (and its related bodies corporate) situated within Australia or located overseas. These MMPL companies are located in Australia, New Zealand, Singapore and Hong Kong.

We may also send and store your personal information overseas to or with service providers or other third parties who store data for us outside Australia such as cloud storage products or provide technology products and services to us, where we reasonably believe that the overseas recipient is subject to laws that protect the

information in a substantially similar way to the APPs. These overseas recipients are likely to be situated within New Zealand, the United Kingdom, the United States of America, Europe, the Pacific Islands, South Africa, Philippines, Indonesia and Singapore. However, this may change from time to time due to changes of providers, changes in data protection practices and processing efficiency. Where we disclose personal information overseas, we ensure that appropriate data handling and security arrangements are in place and will take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to the information. We will only transfer personal information outside Australia to a third-party recipient, if the recipient of the information agrees (or is compelled) to comply with privacy policies that are in accordance with (or are more stringent than) the APPs.

7. Credit checks and credit reporting

Credit reports

Where you apply to us for credit or propose to be a guarantor, one of our checks involves obtaining a credit report about you. A credit report contains information about your credit history which helps credit providers assess your credit applications, verify your identity and manage accounts you hold with them. Credit reporting bodies ("**CRBs**") collect and exchange this information with credit providers like us and other service providers such as phone companies.

Credit reporting bodies include Equifax, NCI, Illion, Creditor Watch and Experian. A copy of the credit reporting policy for those CRBs will be available on their website or will be provided in hard copy upon request.

The Privacy Act limits the information that credit providers can disclose about you to CRBs, as well as the ways in which credit providers can use credit reports.

Information exchanged with CRBs

You consent to us obtaining and making disclosure of credit information (as defined in the Privacy Act) about you from and to a CRB in accordance with, and as permitted in, the Privacy Act. The information we can exchange includes your identification details, type of credit extended to you, amount of credit extended to you, whether or not you have met your credit obligations and if you have committed a serious credit infringement (such as fraud). We may use and/or disclose credit eligibility information under section 21G of the Privacy Act.

We also ask the CRB to provide us with an overall assessment score of your creditworthiness.

Use and storage of credit-related information

We use information from CRBs to confirm your identity, assess applications for credit, manage our relationship with you and collect overdue payments. We may also use this information to assess your creditworthiness.

We store credit-related information with your other personal information. You can access credit-related information we hold about you, request us to correct the information and make a complaint to us about your credit-related information.

Credit providers may ask CRBs to use their credit-related information to pre-screen you for direct marketing. You can ask a CRB not to do this. Also, if you've been, or have reason to believe that you're likely to become, a victim of fraud (including identity fraud), you can ask the CRB not to use or disclose the credit-related information it holds about you.

8. Accessing, updating and correcting your information

You may contact us to request access to the personal information that we hold about you and/or to make corrections to that information, at any time, by contacting our Privacy Officer, whose details are set out below. We will respond to all requests for access to or correction of personal information within a reasonable time. If we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may require some proof of identity and seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

9. Social account data deletion instructions

If you use a social account login, such as Facebook or Google, to access our website or application ("**App**") and wish to delete your social account data from our website or App, you can remove your information by following the relevant steps within your Facebook and Google settings. Alternatively, you can log in to your account with us and click "My Social Accounts" to unlink your social account.

We do not save your personal data from social accounts on our server.

10. Cookies

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing our website. This information will help to better adapt our website to suit personal requirements.

While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

You can disable your internet browser from accepting cookies if you wish. If you do so, you can still access our website, however not all features of our website may operate as intended, you may not be able to visit certain areas of our website or you may not receive personalised information when you visit our website.

11. Complaints

If you have any questions, concerns or complaints about this privacy policy, or how we handle your personal information, please contact our Privacy Officer, whose details are set out below.

In dealing with your complaint we may need to consult another credit provider or third party. Our Privacy Officer will acknowledge any complaints received and provide you with an outline of the process and timeframes for responding to the complaint.

If you are not satisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner

GPO Box 5218 Sydney NSW 2001
Email: enquiries@oaic.gov.au
Phone: 1300 363 992
Facsimile: +61 2 9284 9666

12. Privacy Officer

Our Privacy Officer's details are:

The Privacy Officer
Metal Manufactures Pty Limited
Phone: +61 2 8839 9000
Email: reportincident@mml.com.au

13. Changes

If we decide to change our privacy policy, we will post an updated copy on our website.