



PRIVACY AND CREDIT REPORTING POLICY

KLEIBERIT AUSTRALIA Pty Ltd (ABN 85 610 969 447) (**we, us, our**) is a manufacturer and supplier of adhesive systems for a wide field of applications and is bound by the Australia Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (the **Act**). To the extent we handle your credit information, we will also comply with the Privacy (Credit Reporting) Code 2014 (Version 2) (**Credit Reporting Code**).

We understand the importance of, and are committed to, protecting your personal information. This Privacy Policy explains how we manage your personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable), including our obligations and your rights in respect of our dealings with your personal information.

Please take a moment to read our Privacy Policy as it describes what happens to your personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable) that is collected from various sources, including via our website at www.kleiberit.com (the **Website**).

1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- (a) when you make an application for a credit account with us;
- (b) when you make an inquiry or order in relation to goods or services by way of an order or through our website located at www.kleiberit.com ;
- (c) in administering and performing any contracts with service providers;
- (d) when you contact us via telephone or facsimile;
- (e) from correspondence (whether in writing or electronically);
- (f) through any mobile applications provided by our organisation;
- (g) while conducting customer satisfaction and market research surveys;
- (h) when administering any of our services;
- (i) when obtaining information from credit reporting bodies; and
- (j) as otherwise required to manage our business.

However, in certain cases we may collect personal information from publically available sources and third parties, such as suppliers, recruitment agencies, contractors, our clients and business partners, social media and similar websites.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

2. Types of personal information we collect

Generally, the kinds of personal information we collect are (noting that the following personal information may be collected about you in your capacity as an employee, director or other representative of a corporate customer of us, as applicable):

- (a) contact and identification information such as your name, address, telephone number, email address, date of birth and drivers licence or ID number;
- (b) financial information about your assets, occupation and income, account balances, account activities, payment history and transactions with us or third parties;
- (c) credit information, being credit related personal information lawfully created and accessible within the Australian credit reporting system including:
 - (i) identification information;
 - (ii) consumer credit liability information which includes information about your credit providers and credit accounts, including the dates on which the accounts are opened and closed, their limits, and their terms and conditions (or any changes to their terms and conditions);
 - (iii) whether you have or have not met any monthly repayment obligations;
 - (iv) whether you have defaulted on a payment (ie. a payment that is at least 60 days overdue and over \$ 150.00 in value) provided we have notified you in accordance with the Act;
 - (v) whether you have paid any amount previously reported as being in default;
 - (vi) that another credit provider has sought credit-related personal information about you from a credit reporting body;
 - (vii) information about the types of consumer or commercial credit, and the amounts of credit, you have sought from a credit provider;
 - (viii) information about court proceedings related to credit provided to you or for which you have applied;
 - (ix) personal insolvency information and other publicly available information relating to your credit worthiness;
 - (x) a credit provider's reasonable belief that you have committed a serious credit infringement;

- (xi) any other information lawfully obtainable within the Australian credit reporting system;
- (xii) credit eligibility information which is credit-related information about you that we obtain from a credit reporting body such as Dun & Bradstreet (**D & B**) (the details of which are set out in paragraph 3 below), together with information we derive from such information based on its own analysis including internally generated scores, ratings and other assessments used to evaluate your credit worthiness. We generally receive from D & B information about existing credit accounts, previous defaults, repayment history information etc; and
- (xiii) sensitive information including criminal record information where you are applying for a position with us and it is relevant to the recruitment process through which you must progress following your application to us. In some circumstances we may also hold other personal information provided by you.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services.

3. Our purposes for handling your personal information

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use and disclose personal information to:

- (a) offer and provide you with our goods and services;
- (b) manage and administer those goods and services, including account keeping procedures;
- (c) communicate with you, including (but not limited to), emailing you tax invoices, dispatch and tracking information, returns and exchange authorisations;
- (d) assess an application for, and if successful, administering your credit application and account, application for employment or otherwise for the purpose of engaging you as a contractor or consultant;
- (e) comply with our legal and regulatory obligations; and
- (f) otherwise to manage our business.

We will only disclose your personal information including credit related information, for a purpose set out in this Privacy Policy. This may include disclosing your personal information including credit related information to:

- (a) third parties engaged to perform administrative or other business management functions;
- (b) people or entities considering acquiring an interest in our enterprise or assets;



- (c) our business partners;
- (d) our professional advisors including accountants and legal advisors, contractors, consultants and related bodies corporate;
- (e) our parent company, KLEBCHEMIE M.G. Becker GmbH & Co. KG, in Germany;
- (f) insurance providers; and
- (g) regulatory bodies, if and as necessary.

We may also disclose your personal information, including your credit information, to lenders, other credit providers and credit reporting bodies, D & B (contactable on the details set out below). In particular, we may disclose to D & B information about you failing to meet your payment obligations or if you commit a serious credit infringement. D & B may include any information provided to it by us in reports that are then provided to other credit providers for the purpose of such credit providers assessing your credit worthiness. Our disclosures of your personal information to third parties are on a confidential basis, in accordance with relevant non-disclosure agreements, and/or otherwise in accordance with law. We may also disclose your personal information with your consent or if disclosure is required or authorised by law.

D & B can be contacted:

- in accordance with its privacy policy, including its management of credit related personal information, at: <http://dnb.com.au/privacy-policy.html> ; and/or
- at: ground Floor, 479 St Kilda Road, Melbourne Vic 3004 or otherwise by phone on 13 23 33;

We will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure.

4. Protection of personal information

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas. Credit eligibility information, such as information we receive from D & B for the purpose of assessing credit worthiness, is stored through equally secure methods set out in this paragraph 4.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

5. Direct marketing

Like most businesses, marketing is important to our continued success. We believe we have a unique range of products and services that we provide to customers at a high standard. We therefore like to stay in touch with customers and let them know about new opportunities. We may provide you with information about new products, services and promotions either from us, or from third parties which may be of interest to you.

We will not use or disclose credit related personal information for direct marketing purposes except to the extent permitted under the Act, for the purpose of D & B assessing your eligibility to receive direct marketing communications sent on our behalf. You may make a request directly to D & B not to use your credit related personal information for these purposes

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer or through any opt-out mechanism contained in a marketing communication to you.

6. 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 the Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. Please refer to www.kleiberit.com/en/privacy for further information on cookies and our web-analysis.

7. Accessing and correcting your personal information

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may 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 it does 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.

We will respond to all requests for access to or correction of personal information within a reasonable time.

Where necessary to resolve a request for correction of your credit related personal information, we may also consult with other relevant entities, including but not limited to D & B. Our use or disclosure of your credit related personal information for correction purposes is permitted by the Act.

8. Overseas transfers of personal information

We may disclose your personal information, including credit related personal information, to KLEBCHEMIE M.G. Becker GmbH & Co. KG, our parent company, in Germany, to provide our products and/or services and for administrative, data storage or other business management purposes.

As at the date of this Privacy Policy, we are not likely to disclose personal information, including credit related personal information, to other overseas recipients. If in future we do propose to disclose personal information overseas, we will do so in compliance with the requirements of the Privacy Act. We will, where practicable, advise you of the countries in which any overseas recipients are likely to be located.

By providing your personal information to us, you consent to us disclosing your personal information to any such overseas recipients for purposes necessary or useful in the course of operating our business, and agree that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the Australian Privacy Principles, that entity will not be bound by, and you will not be able seek redress under, the Act.

If you have any queries or objections to such disclosures, please contact our Privacy Officer on the details set out in paragraph 9.

From time to time we may engage an overseas recipient to provide services to us, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider. However, by providing us with your personal information, you consent to the storage of such information on overseas servers and acknowledge that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the APPs, that entity will not be bound by, and you will not be able seek redress under, the Privacy Act.

9. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Privacy Officer:

The Privacy Officer – Doris Cooke

Address: Unit 36, 42-46 Wattle Road, Brookvale NSW 2100

Telephone: 02 9907 1411

Email: doris.cooke@kleiberit.com

We take all complaints seriously, and will respond to your complaint within a reasonable period.

If your complaint relates to credit related personal information and/or our failure to comply with our obligations regarding credit related personal information under the Act and/or the Credit Reporting Code:



- we will acknowledge your complaint within 7 days of receipt and endeavour to resolve it within 30 days, unless we inform you otherwise and seek your agreement in writing;
- we may consult with relevant third parties such as D & B and/or other credit providers, in order to sufficiently and expeditiously resolve the complaint; and
- if your complaint relates to our refusal to provide access to, or correct, your credit related personal information, you may complain directly to the Office of the Australian Information Commissioner.

Our Privacy Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, or an extension to the time in which we will resolve it, you may refer the complaint to the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

10. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.

The last update to this document was 13/08/2018