GLENMAR HOLDINGS PTY LTD
PRIVACY POLICY

MANAGEMENT OF PERSONAL INFORMATION AND CREDIT REPORTING INFORMATION

At Glenmar Holdings Pty Ltd (**Glenmar Holdings, we, us,** or **our**) and our subsidiary companies, we recognise the importance of your privacy and understand your concerns about the security of the personal information, personal credit history and credit worthiness information you provide to us. We comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) including the Australian Privacy Principles (**APPs**) and the Credit Reporting Regime and the Credit Reporting Privacy Code (**CR Code**) (collectively, the **Privacy Legislation**). The APPs, Credit Reporting Regime and the CR Code specifically detail how we may collect, use, disclose, store and destroy the personal information and credit information we hold about you.

The Privacy Act defines the following terms:

Credit eligibility information about an individual means:

(a) credit reporting information about the individual that was disclosed to a credit provider by a credit reporting body under Division 2 of Part IIIA of the Privacy Act; or
(b) CP derived information about the individual - meaning any personal information (other than sensitive information) about the individual;
   i. that was derived from (a) above; and
   ii. that has any bearing on the individual's credit worthiness; and
   iii. that is used, has been used or could be used in establishing the individual's eligibility for consumer credit.

Credit information about an individual is personal information (other than sensitive information) that is:

(a) identification information about the individual; or
(b) consumer credit liability information about the individual; or
(c) repayment history information about the individual; or
(ca) financial hardship information about the individual; or
(d) a statement that an information request has been made in relation to the individual by a credit provider, mortgage insurer or trade insurer; or
(e) the type of consumer credit or commercial credit, and the amount of credit, sought in an application:
   i. that has been made by the individual to a credit provider; and
   ii. in connection with which the provider has made an information request in relation to the individual; or
(f) default information about the individual; or
(g) payment information about the individual; or
(h) new arrangement information about the individual; or
(i) court proceedings information about the individual; or
(j) personal insolvency information about the individual; or
(k) publicly available information about the individual
   i. that relates to the individual's activities in Australia or the external Territories and the individual's credit worthiness; and
   ii. that is not court proceedings information about the individual or information about the individual that is entered or recorded on the National Personal Insolvency Index; or

(l) the opinion of a credit provider that the individual has committed, in circumstances specified by the provider, a serious credit infringement in relation to consumer credit provided by the provider to the individual.

Personal information is information or an opinion about an identified individual, or about an individual who is reasonably identifiable:

(a) whether the information or opinion is true or not; and
(b) whether the information or opinion is recorded in a material form or not.

Sensitive information, a sub-set of personal information, is information or an opinion about an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information, genetic information and biometric templates.

This policy details how we manage personal information, credit information and credit eligibility information about you.

In the course of doing business, we endeavour to collect business information only. However, the collection of personal information in some instances is necessary or unavoidable.

What personal information, credit information and credit eligibility information we collect and hold

The kinds of personal information, credit information and credit eligibility information we collect from you or about you, depends on the transaction you have entered into with us, the goods and services you or your organisation have contracted us to provide, and the goods and services you or your organisation are interested in.

If you are a customer, then the kinds of personal information that we commonly collect and hold from you or about you include: your name, address, phone, mobile numbers, email address, and bank account or credit payment details.

If you are an employee or contractor (or a prospective employee or contractor), the kinds of personal information we commonly collect and hold from you or about you may include: your name, address, gender, date of birth, telephone numbers, voice and image, email address, education, qualifications, employment experience, drivers licence details, vehicle details, proof of citizenship, CV or resume, background checks, referee checks, notes recorded during the application process, banking, tax and superannuation accounts and identification numbers, next of kin or emergency contact details, and medical certificates or health information. We generally collect personal information directly from you, but may also collect personal information from other sources (e.g. recruitment agents).

We will generally collect credit information from you if you are a sole trader, a member of a partnership or an individual trustee, and you apply for a commercial credit account with us; or you are or propose to become a guarantor for someone else's commercial credit account with us.

The kinds of credit information we commonly collect and hold from you or about you include: your name, alias or previous names, date of birth, gender, drivers licence details, current and 2 previous residential addresses, and name of your current employer.

We collect and hold information relating to your personal current credit liabilities, previous credit payments and defaults, current and previous Court proceedings and insolvency actions against you and information about your credit worthiness. This credit information may relate to both consumer and/or commercial credit.

What credit eligibility information we hold

We hold reports and information disclosed to us by a credit reporting body (such as Ilion, Experian or Equifax). We also compile our own, internal credit file about you on the basis of such information. This information relates to an assessment of your personal credit worthiness.

Cookies

When you browse our website, contact us electronically, or engage with us on social media, we may also record geographical tagging, cookies, your IP address and statistical data from your activity. We may use your personal information to customise and improve your user experience on our website and other social media platforms. By using our website you agree that we can record this information from your device and access them when you visit the site in the future.

If you want to delete any cookies that are already on your computer, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies. Please note that by deleting our cookies or disabling future cookies that you may not be able to access certain areas or features of our site.

Our website may also contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

How we collect and hold personal information, credit information and credit eligibility information

We aim to collect personal information, credit information and credit eligibility information directly from you, unless it is unreasonable or impracticable for us to do so. For example, we collect this kind of information from you or about you from:

- enquiries, project orders, contract, application forms and other correspondence that you submit to us;
- telephone calls, consultations and meetings with us; and
- your activity on our website and social media platforms.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

We will also collect credit information about you from specific requests that we make to credit reporting bodies. In some instances, we may receive credit information about you from other credit providers with whom you deal.

Credit eligibility information will be disclosed to us by credit reporting bodies in response to our request. Our obligation under the Privacy Legislation does not require us to obtain individual consent to the disclosure of information to a credit reporting body.

Why we collect, hold, use and disclose personal information, credit information and credit eligibility information

We collect, hold, use and disclose personal information, credit information and credit eligibility information from you or about you where it is reasonably necessary for us to carry out our business functions, activities and services. For example, we collect, hold, use and disclose your personal information, credit information and credit eligibility information as necessary to provide our goods and services, and to schedule and complete out contracts and projects and for the purposes of assessing your application for a commercial credit account with us, and for collecting overdue payments.

If you are a guarantor or proposed guarantor for someone else's credit account, we collect, hold, use and disclose credit information and credit eligibility information about you for the purpose of assessing your suitability as a guarantor, and (if necessary) for enforcing the guarantee and collecting payments owed to us.

Generally, we do not collect sensitive or health information. However, we may collect sensitive information from you or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. For example, we may collect some sensitive information from or about our current and prospective employees and contractors, in order to made operational decisions about our business and for site and project planning etc. In all other situations, we will specifically seek your consent.

If we do not collect, hold, use or disclose your personal information, credit information or credit eligibility information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction or project you have entered into, or provide the goods and services that you or your organisation have contracted us to provide.

We also collect, hold, use and disclose your personal information, credit information and credit eligibility information for related purposes that you would reasonably expect, such as our administrative and accounting functions, business operations, site and project scheduling, record keeping, payment processing, fraud checks, warranty and repair work, providing you with information about other goods and services offered by us, marketing and promotions, market research, customer feedback and quality assurance surveys, statistical collation, social media analysis and website traffic analysis.

Your personal information, credit information and credit eligibility information are routinely shared amongst our related entities for each of the above purposes. We will disclose credit information about you to credit reporting bodies for purposes related to assessing your credit worthiness, and reporting on payment defaults.

Where we wish to use or disclose your personal information, credit information or credit eligibility information for other purposes, we will obtain your consent. We may disclose credit eligibility information to other credit providers and to guarantors, where we have obtained your consent.

We may also disclose personal information, credit information and credit eligibility information to third parties (including debt collectors, government departments and enforcement bodies) where required or permitted by law, or where it is reasonably necessary to provide our goods and services, and to schedule and complete our contract and projects.

Where we use your personal information for marketing and promotional communications, you can opt out at any time by notifying us.

How we hold and store personal information, credit information and credit eligibility information

Your personal Information, credit information and credit eligibility information about you is held by electronic means. We have electronic and procedural safeguards in place for personal information, credit information and credit eligibility information and take reasonable steps to ensure that your personal information, credit information and credit eligibility information is protected from misuse, interference and loss, and from unauthorised access, modification and disclosure. Data held and stored electronically, including "in the Cloud", is protected by internal and external firewalls, limited access via file and network passwords, and files can be designated read-only or no access.

Destruction and De-identification

We will retain your personal information, credit information and credit eligibility information whilst it is required for any of our business functions, or for any other lawful purpose.

We will take reasonable steps, and we will use secure methods to destroy or to permanently de-identify your personal information, credit information and/or credit eligibility information when it is no longer required for any purpose for which the personal information, credit information and/or credit eligibility information may be used under this policy and otherwise in accordance with the Privacy Act.

Overseas disclosure

Our business is affiliated with other businesses / organisations / people located overseas. In the course of assessing and reporting on your personal information and credit suitability, we are likely to disclose some of your personal information and credit eligibility information to overseas recipients. However, we will only do so where we have first taken reasonable steps to ensure that the overseas recipient will not breach the relevant requirements of the Credit Reporting Regime and/or Privacy Act.

Our overseas affiliates are located in China (including Hong Kong) and United Kingdom.

Requests for access and correction

We will take reasonable steps to ensure that the personal information, credit information and credit eligibility information we use or disclose is accurate, complete and up to date, having regard to the purpose of the use or disclosure.

We rely on the personal information, credit information and credit eligibility information we hold about you to efficiently provide our goods and services, and to schedule and administer our contract and projects. For this reason, it is very important that the personal information, credit information and credit eligibility information we collect from you is accurate, complete and up-to-date. Please notify us of any changes to your information.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why.

Data Breaches

In Australia, if we suspect that a data breach has occurred, we will undertake an assessment into the circumstances of the suspected breach within 30 days after the suspected breach has occurred. Where it is ascertained that a breach has actually occurred and where required by law, we will notify the Privacy Commissioner and affected individuals as soon as practicable after becoming aware that a data breach has occurred.

Complaints and Concerns

We have procedures in place for dealing complaints and concerns about our practices in relation to the Privacy Act, the APPs, the CR Code, and any alleged breach of this policy. We will respond to your complaint in accordance with the relevant provisions of the Privacy Act or the CR Code. Please contact us for further information.

Group

Glenmar Holdings is part of a corporate group, which also comprises of the following entities:

- Glenmar Industries Pty Ltd
- Glenmar UK Ltd
- Glenmar HK Ltd
- Ningbo Glenmar Auto Parts Manufacture Co. Ltd

Contact

Privacy Officer
Glenmar Holdings Pty Ltd
PO BOX 292,
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