

PRIVACY POLICY

The ASKIN Group is bound by the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (**APPs**) in Australia and the *Privacy Act 2020* (NZ) in New Zealand. This policy explains how and why the ASKIN Group collect, use, hold and disclose your personal information.

The ASKIN Group means Askin Group Holdings Pty Limited and each of its related bodies corporate, which, for the avoidance of doubt, includes the Bondor NZ and XFLAM businesses.

You consent to the ASKIN Group collecting, holding, using and disclosing your personal information in accordance with this policy.

WHAT IS PERSONAL INFORMATION?

Personal information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information regardless of whether it is true.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

The ASKIN Group collects information about you and your interactions with it, for example, when you purchase or use any of the ASKIN Group's products or services, call us or otherwise visit our website. The information the ASKIN Group collects from you may include your identity and contact details, your history of purchases and use of our products and services and details of enquiries or complaints you make.

The ASKIN Group may collect information about how you access, use and interact with the website. This information may include:

- a) the location from which you have come to the site and the pages you have visited; and
- b) technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system.

The ASKIN Group uses cookies on the website. A cookie is a small text file that the website may place on your device to store information. The ASKIN Group may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. The ASKIN Group may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website. You may refuse to use cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of the website.

WHY DO WE COLLECT, HOLD AND USE YOUR PERSONAL INFORMATION?

The ASKIN Group collects, holds and uses your personal information so that it can:

- a) provide you with products and services, and manage its relationship with you;
- b) contact you, for example, to respond to your queries or complaints, or to tell you something

important;

- c) comply with its legal obligations and assist government and law enforcement agencies or regulators; or
- d) identify and tell you about other products or services that it thinks may be of interest to you.

If you do not provide the ASKIN Group with your personal information, it may not be able to provide you with its services, communicate with you or respond to your enquiries.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

The ASKIN Group will collect your personal information directly from all of your interactions with it.

HOW DO WE STORE AND HOLD PERSONAL INFORMATION?

The ASKIN Group stores most information about you in computer systems and databases operated by either the ASKIN Group or its external service providers. Some information about you is recorded in paper files that we store securely.

The ASKIN Group implements and maintains processes and security measures to protect personal information which it holds from misuse, interference or loss, and from unauthorised access, modification or disclosure.

These processes and systems include:

- a) the use of identity and access management technologies to control access to systems on which information is processed and stored;
- b) requiring all employees to comply with internal information security policies and keep information secure;
- c) requiring all employees to complete training about information security; and
- d) monitoring and regularly reviewing our practise against our own policies and against industry best practice.

The ASKIN Group will also take reasonable steps to destroy or de-identify personal information once it no longer requires it for the purposes for which it was collected or for any secondary purpose permitted under the APPs. The ASKIN Group will only hold your personal information for as long as it is required for the purposes for which it may be lawfully used.

WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO, AND WHY?

The ASKIN Group may transfer or disclose your personal information to our related companies.

The ASKIN Group may disclose personal information to external service providers so that they may perform services for the ASKIN Group on our behalf. The ASKIN Group may also disclose

your personal information to others outside of the group of companies where:

- a) the ASKIN Group is required or authorised by law to do so;
- b) you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- c) the ASKIN Group is otherwise permitted to disclose the information under the Privacy Act.

If the ownership or control of all or part of our business changes, the ASKIN Group may transfer your personal information to the new owner.

DO WE DISCLOSE PERSONAL INFORMATION TO OVERSEAS RECIPIENTS?

The ASKIN Group may disclose your personal information to recipients which are located outside Australia, for example, in New Zealand. For personal information being disclosed from New Zealand to Australia, the ASKIN Group believes on reasonable grounds that the recipients will be subject to privacy laws provided comparable safeguards to those in the *Privacy Act 2020* (NZ). For personal information disclosed from Australia to New Zealand, if you acknowledge that you have read this policy (or have given consent to the ASKIN Group's management of their personal information in some other way), then the ASKIN Group is not required to ensure that the overseas recipient to which personal information is given complies with the Privacy Act.

DO WE USE YOUR PERSONAL INFORMATION FOR MARKETING?

The ASKIN Group will use your personal information to offer you products and services it believes may interest you, but it will not do so if you tell the ASKIN Group not to. These products and services may be offered by the ASKIN Group, its related companies, or other business partners or service providers.

Where you receive electronic marketing communications from the ASKIN Group, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication.

ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION

Subject to applicable privacy legislation, you may access or request correction of the personal information that the ASKIN Group holds about you by contacting the ASKIN Group. The ASKIN Group's contact details are set out below. There are some circumstances in which the ASKIN Group is not required to give you access to your personal information.

The ASKIN Group will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information it holds about you remains accurate and up to date.



COMPLAINTS

If you have a complaint about the way in which the ASKIN Group has handled any privacy issue, including your request for access or correction of your personal information, you should contact us. Our contact details are set out below.

The ASKIN Group will consider your complaint and determine whether it requires further investigation. The ASKIN Group will notify you of the outcome of this investigation and any subsequent internal investigation.

If you remain unsatisfied with the way in which the ASKIN Group has handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (OAIC) (www.oaic.gov.au) / the Office of the New Zealand Privacy Commissioner for guidance on alternative courses of action which may be available.

CONTACT DETAILS

If you have any questions, comments, requests or concerns, please contact us at:

contacts@askin.net.au in Australia

nz@askin.net.au in New Zealand

CHANGES TO THIS POLICY

From time to time, the ASKIN Group may change our policy on how it handles personal information or the types of personal information which the ASKIN Group holds. Any changes to the policy will be published on our website.

You may obtain a copy of the current policy from the ASKIN Group's website or by contacting us at the contact details above.

OTHER MATTERS

This policy does not form part of any contract between the ASKIN Group and any person and is not, and is not intended to be, contractual in nature or to have any contractual effect. The ASKIN Group can vary, replace or revoke this policy.