

## SULO MGB AUSTRALIA PTY LIMITED - PRIVACY POLICY

### Who We Are

In this Privacy Policy “we”, “our”, “us” and “SULO Aus” refers to SULO MGB Australia Pty Ltd and each of its related entities. We are in the business of the development, production and application of Environmental Technology & Services in various states and territories in Australia and overseas. SULO MGB Australia Pty Limited and its related entities may maintain additional rules and practices, which are fully consistent with this Privacy Policy.

### Our Commitment to Privacy & Responsible Use of Personal Information

SULO MGB Australia Pty Ltd recognise and respect your privacy. We are committed to protecting the privacy of your personal information and to handling your personal information in a responsible manner in accordance with the Federal Government’s Privacy Act 1988 (“*Privacy Act*”). This Privacy Policy indicates how we manage your personal information.

The *Privacy Act* outlines the National Privacy Principles, which set the minimum standards for how private sector organisations should handle your personal information.

***Sulo MGB Australia Pty Ltd is committed to complying with the National Privacy Principles and to all other personal information and privacy legislation or regulations relevant to other Australian states and territories where the company may conduct its normal business.***

This policy is applicable to personal information that we hold about you in Australia and does not apply to information held by the SULO Group of companies outside of Australia. Some of the countries that the SULO Group operates in have privacy or data protection laws for private sector organisations similar to the law in Australia, whilst other countries do not.

We may, from time to time, modify this Privacy Policy to reflect legal, technological and other developments. In that event, the changes will appear at this location.

Please note that **Privacy Statements** advising customers and prospects as to the specific uses that are being made of their personal information by specific business units within SULO Australia MGB Pty Ltd may also be modified from time to time to reflect changes in business practices. In this event, those changes will appear in the relevant **Privacy Statements**.

### Collection of Personal Information

If we do not collect and make use of your personal information, we are unable to do business with you. Generally it is not possible for us to do business with you unless we have identified you. When ever possible we will collect your personal information from you directly, however there may be occasions when we collect personal information about you from someone else i.e. through your agent. We may also collect information about someone else from you i.e. where you want the benefit of a product or service to also apply to someone else.

If you provide information to us about another person you are responsible for telling that person: - that you have provided information about them to us, who we are, and that they may access their personal information.

When you apply for a specific product or service, we may also collect information from you related to that product or service.

Irrespective of the source of the information we recognise and respect the privacy of personal information.

We collect your personal information in various ways, such as when you make a request or enquiry over the telephone, via email or the internet (if you transact with us online) on a product or service that we offer or promote.

Normal personal information that we would collect and store generally includes your name, company name, address and contact details including telephone and facsimile number and e-mail address as provided by you to us. Personal information collected may include "click stream" data that tracks user activity on our Web site.

Our website may use cookies to customize your experience on that site. Cookies are data placed in the hard drive of your computer to determine whether your computer has accessed the site before and to allow us to provide you with further information in accordance with your stated preferences. It assigns the computer a unique identifier and is essentially the visitor's identification card when s/he returns to our website. Sulo website cookies cannot damage visitor files, nor can they read information from the visitor's hard drive. These cookies are permanent.

If you do not want the benefits of these cookies you can set your browser to reject the cookies. Please consult the instructions for your particular browser on how to do this. However, you should understand that rejecting cookies might affect your ability to perform certain transactions on our websites and our ability to recognise your browser from one visit to the next.

Please note that our Web site may contain links to other Web Sites that have their own privacy policies and practices. While we will employ commercially appropriate procedures to help ensure that your information is only used for authorised purposes as described above, we cannot make any guarantees nor have any responsibility or liability for the actions, policies and security measures of such third parties. We encourage you to contact them to ask questions about their privacy practices, policies and security measures before disclosing personal information.

### **How We Use Personal Information**

SULO Aus use the personal information that we collect in accordance with the National Privacy Principles. We collect, use, store, and disclose the personal information that we obtain from you in order that we can conduct our normal business; to administer and enhance the business service relationship we have with you; for marketing purposes (subject to your consent\*), and for any other compatible purpose including the management, protection and development of our business.

### **Sharing and Disclosure**

We will only use your personal information for the purposes for which you have disclosed it to us. However, we may share your personal information where this is necessary to prevent a serious threat to health or safety or as required or authorised by law or to enforce the law.

On occasions, we may need to disclose your personal information to provide a product or service to you. Generally however, we will not disclose your personal information to a party outside SULO Aus unless that party is contracted by us to provide services or activities on our behalf and that party is bound by the same privacy rules we follow.

## **Security**

We have systems and procedures in place to protect your privacy whenever we collect, use, store or disclose your personal information. Access to personal information is limited to those who specifically need it to conduct their business responsibilities. Personal information held on our systems is protected through the use of secure passwords and other security procedures. Physical security procedures are maintained to manage and protect the use and storage of paper records containing personal information.

Generally, email is not a secure way to communicate; therefore we recommend that you should not send your personal information to us via e-mail. We caution you that if you disclose personal information via email that information may be collected and used by third parties without our knowledge and may result in unsolicited communications from third parties. Such activities are beyond the control of SULO MGB Australia Pty Ltd.

We will retain your personal information so that we can continue to provide the products and services you have requested from us. We will take reasonable steps to destroy or permanently de-identify information when we no longer need it.

By law we may be required to retain your personal information for a period of time after you have ceased your relationship with us. After the required time has passed we will take reasonable steps to destroy or permanently de-identify personal information when we no longer need it.

## **Accuracy**

We will take reasonable steps to ensure that the information we hold about you is accurate, complete and up-to-date. Please contact us if you believe that the personal information we hold about you is inaccurate, incomplete or out-dated.

## **Access**

Please contact us if you would like to know how to request access to your personal information held by us.

SULO Aus is not always required to provide you with access to your personal information when you request it. We may refuse you access to personal information in a number of circumstances i.e. where the information may relate to existing or anticipated legal proceedings with you, where denying access is required or authorised by law, or where the request for access is regarded as frivolous or vexatious.

We will tell you why if we are unable to meet your request for access to your personal information.

## **Complaints**

We ask that you contact us in writing if you have a complaint about the privacy of your personal information held by us. Complaints will be acknowledged and investigated in a reasonable and timely manner.

## **\*What You Consent and Agree To**

When you provide us with your personal information you consent and agree to our use and disclosure of your personal information in accordance with this Privacy Policy including, in particular to:

- our use and disclosure of that information in order to provide the product and/or service you have requested and for any other compatible purpose including the management, protection and development of our business;
- The disclosure of your personal information to entities located outside of Australia. This may include disclosure to our service providers and distributor organisations. You should understand that once your information is held outside of Australia it may not receive the same level of protection that the Privacy Act requires; and
- Our use and disclosure of your personal information for marketing purposes. Please contact us if you do not wish us to use or disclose your personal information for marketing purposes.

## **Further Information**

Please contact us if you do not wish us to use or disclose your personal information as set out in the paragraphs above; wish to access or update your personal information; have a comment or complaint, or would like further information regarding our **Privacy Policy** on the management and security of your personal information:

Sulo Privacy  
Sulo MGB Australia Pty Ltd  
123 Wisemans Ferry Road, Somersby NSW 2250  
PO Box 1957, Gosford NSW 2250 Australia

## **Currency of Policy**

This Policy last updated at 30<sup>th</sup> July 2004.