

1. Objective of Policy

The objective of this Policy is to protect the privacy of individuals dealing with Us and to explain how We collect, use, disclose and store Personal Information in accordance with the APPs. This Policy also describes why We collect Personal Information and how You can access and correct Personal Information about You. This Policy does not cover information collected about employees.

2. Type of Personal Information collected

We may collect Personal Information or opinions about You in the normal course of Our dealing with You. This Personal Information is collected in order to conduct business with You. The Personal Information may include Your name, contact details, bank details, financial status, results of enquiries with credit reporting agencies or other information that is required by Us to conduct business with You. No Sensitive Information will be collected without Your consent.

3. How We collect Personal Information

We collect Personal Information, directly from You and from third parties, by such means as company forms, contracts, credit applications, orders, market research, phone enquiries, mail, fax, email and online when You access Our website to purchase or place orders.

Personal Information provided to Us will always be handled by Us in accordance with this Policy and the APPs, regardless of who provides it.

4. Purposes for which Personal Information is collected

4.1 We collect Personal Information for one or more of the Primary Purposes.

4.2 We also collect Personal Information for one or more of the Secondary Purposes but only if it is related to one or the other of Primary Purposes.

5. Notification of collection of Personal Information

If Personal Information about You is collected from someone other than You and if We are notified that You are not aware that We have collected the Personal Information then We will take reasonable steps to notify You that the Personal Information has been collected and will be dealt with in accordance with this Policy and the APPs.

6. Use or disclosure of Personal Information

We provide goods and services to Our customers. In order to obtain these goods or services, You will need to submit Personal Information to Us. Further, Personal Information that You provide to Us will be stored in a database procured by Us but that may be maintained and serviced by a third party provider through Our Parent Company. However, Personal Information provided by You for the purpose of obtaining any goods or services may be tracked, edited and / or disclosed in order to:

- provide You with the goods or services You have requested;
- help Us develop, improve, manage and administer all of the services We provide to You;
- comply with the law;
- investigate, respond to and defend claims made against, or involving Us; and
- enforce a contract or agreement which We have with You.

We may also use or disclose Your email address or other contact details to third parties to:

- send You follow-ups on goods or services You have enquired about; and
- keep You informed of changes to the goods and services offered by Us.

We also use or disclose the Personal Information that We collect for other purposes such as preparing marketing material, processing transactions, providing customer support, providing credit to customers, providing Personal Information to credit reporting agencies and obtaining references. We also exchange Your credit information with credit insurance brokers which may, in turn, provide that information to insurers.

7. Cross-border disclosure of Personal Information

We disclose Personal Information to Our Parent Company in Germany mainly to store customer and vendor data. We, use Our best reasonable endeavours to ensure that Our Parent Company does not breach the APPs. We will only disclose Your Personal Information to persons or bodies external to Us where permitted by the Act, including in the following circumstances:

- where You consent to the disclosure;

- where Our service providers supply Us with services which enable Us to complete a transaction or provide You with goods or services You have requested; and
- where required by law such as under a subpoena issued by a court.

Although We seek to deal with reputable third parties, We cannot control, and will not be liable for, any use of Your Personal Information by any third party to whom Your Personal Information is sent with Your consent.

8. Direct marketing

We may use or disclose the Personal Information for direct marketing purposes to inform You of, among other things, new products, promotions and discounts. If We have received Personal Information from third parties, We may use or disclose it for direct marketing if You have consented to receiving direct marketing or it is impracticable to obtain that consent. We will also give You the opportunity to opt out of receiving direct marketing communications.

9. Security of Personal Information

We maintain security of digital records through password protection and restricting and monitoring access to digitally stored Personal Information. However, no data transmission over the internet or information stored on servers accessible through the internet can be guaranteed to be fully secure. We also maintain security over physical records through storing the records in secured filing cabinets with access restricted to authorised personnel.

10. Retention of Personal Information

We retain Personal Information for a period of six years from the time Our dealings with You become inactive. Ordinarily, We will destroy the Personal Information held at the end of six years or any reasonable time thereafter.

11. Access to Personal Information

You can request Us for Personal Information about You if it is stored by Us. The Personal Information will be provided within a reasonable time after receiving Your request, at a reasonable cost based on time spent in retrieving the information. Requests for Personal Information may be sent to Us using any of the [contact](#) details provided in this Policy.

We may refuse to give access to Personal Information under certain circumstances permitted by law, such as where the request for access is frivolous or vexatious, giving access to Personal Information is unlawful, or if We suspect unlawful activity or anticipated legal proceedings with You. If We refuse to provide Personal Information, We will provide written notice to You within reasonable time that sets out the reasons for refusal unless it is unreasonable to do so.

12. Quality of Personal Information

We are committed to ensure that the Personal Information collected or used or disclosed is reasonably accurate, up-to-date and complete.

13. You may seek correction

If You become aware that the Personal Information stored by Us is wrong, You have the right to have such Personal Information rectified. This facility is provided free of charge to You. You may rectify the Personal Information by providing any necessary documentation. Such details may be supplied by using any of the [contact](#) details provided in this Policy. The Personal Information will be corrected within a reasonable time after receiving all necessary documents.

14. Notification of correction

If We correct Personal Information about You that We previously disclosed to another organisation and if You request Us to notify that other organisation of the correction, We will take reasonable steps to give that notification unless it is impracticable or unlawful for Us to do so.

15. Anonymity

The APPs allow for You to deal with Us without the need to identify Yourself or by using a pseudonym. However, considering the nature of Our business, it is impracticable for Us to deal with You if You have not identified Yourself. If We are not able to collect Your Personal Information, We may not be able to provide appropriate products or services or do business with You or any organisation with which You are connected.

16. Privacy complaints and enquiries

We welcome feedback about privacy issues and will endeavour to attend to all questions and complaints promptly. You can [contact](#) Us about any privacy issues. If You are not satisfied with Our response, a complaint can be lodged with the Australian Information Commissioner at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint> or You can call the OAIC enquiries line on 1300 363 992.

17. Definitions

In this Policy:

- 17.1 “**Act**” means the *Privacy Act 1988* (Cth).
- 17.2 “**APPs**” means the Australian Privacy Principles as set out in Schedule 2 of the Act.
- 17.3 “**Company**” means Regupol (Australia) Pty Ltd ABN 97 094 053 399.
- 17.4 “**Parent Company**” means BSW Berleburger Schaumstoffwerk GmbH, Germany.
- 17.5 “**Personal Information**” means information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. Examples include name, address, phone number, email address, credit card number, bank account number, physical traits, hobbies, usage patterns, family members and income.
- 17.6 “**Policy**” means this privacy policy.
- 17.7 “**Primary Purposes**” means any or all of:
 - 17.7.1 selling and related activities;
 - 17.7.2 provision of credit to customers;
 - 17.7.3 providing customer support;
 - 17.7.4 conducting day to day business of Ours;
 - 17.7.5 buying and related activities;
 - 17.7.6 analysing the financial status of vendors and customers;
 - 17.7.7 considering providing employment;
 - 17.7.8 receiving feedback and dealing with complaints; and
 - 17.7.9 direct marketing activities.
- 17.8 “**Secondary Purposes**” means any or all of:
 - 17.8.1 confidential alternative dispute resolution processes;
 - 17.8.2 the establishment, exercise or defence of a legal or equitable claim;
 - 17.8.3 Our having reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to Our functions or activities has been, is being or may be engaged in; and
 - 17.8.4 Our being authorised by or under an Australian law or a court/tribunal order.
- 17.9 “**Sensitive Information**” includes information about Your racial or ethnic origin, health, religious beliefs, criminal record, membership of a trade union or membership of a professional or trade association.
- 17.10 “**We**” and “**Us**” means the Company, and “**Ours**” has a corresponding meaning.
- 17.11 “**You**” means an individual dealing with Us, and “**Your**” and “**Yourself**” have corresponding meanings.

18. Contact details

Designation: General Manager
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Post: 155 Smeaton Grange Road, SMEATON GRANGE NSW 2567.

19. Version number of this policy

1 (one)

20. Date this Policy was last amended:

24 June 2014