

Privacy Policy

Schulke Australia Pty Ltd (ABN 49 605 683 172)

This Privacy Policy applies to Schulke Australia Pty Ltd and its affiliates (**we, us, our**) in relation to our operations and explains how we handle personal information and comply with the requirements of applicable privacy laws ("**Privacy Laws**"). If you have further questions relating to this Privacy Policy, please contact info.au@schulke.com.

This Privacy Policy is subject to any applicable local Privacy Laws.

We recognise the importance of your privacy, and that you have a right to control how your personal information is collected and used.

1. Collection of personal information

- 1.1 We collect personal information from customers (existing and prospective), suppliers, distributors, contractors, prospective employees, and consumers and other individuals for various business and other purposes further listed in section 2.2 below. In this section, we explain the types of personal information which we usually collect as well as how we collect this information.
- 1.2 The types of personal information we will collect from you will depend on the circumstances in which that information is collected. It may include:
 - (a) contact details (i.e. your name, address, email, phone and facsimile details);
 - (b) information about your employment (eg, place of work, position, authority to transact with us, etc.);
 - (c) information on prior dealings with us or our related bodies corporate;
 - (d) age and information on personal lifestyle preferences;
 - (e) information required as part of a recruitment process;
 - (f) statistical information regarding the use of the our websites, including website users' IP addresses and the dates and times of visits;
- 1.3 We usually collect personal information through:
 - (a) our websites;
 - (b) use of social media
 - (c) orders for products or services;
 - (d) employment applications;
 - (e) third party service providers;
 - (f) requests for brochures, to join a mailing list or to be contacted for further information about our products or services;
 - (g) warranty claims;
 - (h) provision of customer service and support;
 - (i) responses to surveys or research conducted by us or on our behalf;

- 1.4 If you do not provide us with the information we request, we may not be able to fulfill the applicable purpose of collection, such as to supply products or services to you or to assess your application for employment.
- 1.5 Where practicable, we will collect personal information directly from you. If we receive information about you from someone else (for example from someone who supplies goods or services to us), we will take reasonable steps to ensure you are aware that we have collected personal information about you and the circumstances of the collection.

2. Use and disclosure of personal information

- 2.1 We will only use and disclose your personal information in accordance with Privacy Laws and this Privacy Policy.
- 2.2 Our main purposes for collecting, holding, using and disclosing personal information are the following:
 - (a) to supply products or services to our customers;
 - (b) to obtain products and services from our suppliers;
 - (c) to respond to enquiries from existing or prospective customers seeking information about our products or services;
 - (d) to assess and process warranty claims;
 - (e) to process and assess employment applications;
 - (f) to enforce agreements between you and us;
 - (g) to undertake research and surveys and analyse statistical information;
 - (h) to comply with legislative and our policy requirements including in relation to occupational health and safety, environmental matters and for compliance to the Therapeutic Goods Act of Australia.
- 2.3 We generally explain at the time we collect personal information how we will use or disclose that information. We will only use or disclose personal information for a purpose other than for which it was collected or a related purpose if you have consented to such different use or disclosure or such use or disclosure is otherwise allowed by the Privacy Laws.
- 2.4 In carrying out our business, it may be necessary to share information about you with and between our related bodies corporate and organisations that provide services to us. We would not otherwise routinely disclose personal information to another organisation unless:
 - (a) required by law;
 - (b) we believe it is necessary to provide you with a product or service which you have requested;
 - (c) it is necessary to protect the rights, property or personal safety of any of our customers, any member of the public or our interests;
 - (d) the assets and operations of our business are transferred to another party as a going concern; or
 - (e) you have provided your consent.

3. Service providers

- 3.1 Like most large organisations, we use a range of service providers to help us maximise the quality and efficiency of our services and our business operations. This means that individuals and organisations outside of our organisation, such as our third party manufacturer, and mailhouses, will sometimes have access to personal information held by us and may use it on behalf of us. We require our service providers to adhere to strict privacy guidelines and not to keep this information or use it for any unauthorised purposes.

4. Disclosure of information outside the jurisdiction of collection

- 4.1 We may disclose personal information outside of the jurisdiction from which it was collected. In the conduct of our business, we transfer to, hold or access information personal information from various countries including Australia, New Zealand, Singapore, Germany and France. The Privacy Laws of those countries may not provide the same level of protection as the Privacy Laws of the country from which the personal information was collected. However, this does not change our commitments to safeguard your privacy and we will comply with all applicable laws relating to the cross-border data disclosure.

5. Direct marketing

- 5.1 Like most businesses marketing is important to our business' success. We therefore, from time to time, send marketing materials to current or prospective customers or specifiers. We only do so in accordance with applicable laws or with your prior consent.
- 5.2 If you are receiving promotional information from us and do not wish to receive this information any longer, please contact us direct info.au@schuelke.com and ask to be removed from our mailing lists, or use the unsubscribe facilities included in our marketing communications.

6. Our website privacy practices

- 6.1 We sometimes use cookie technology on our websites to provide information and services to website visitors. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes and are a necessary part of facilitating online transactions. Most web browsers are set to accept cookies. Cookies are useful to estimate our number of members and determine overall traffic patterns through our websites.
- 6.2 If you do not wish to receive any cookies, you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of the services on the website.

7. Links to other websites

- 7.1 Our websites may contain links to third party websites. These linked sites are not under our control and we are not responsible for the content of those sites nor are those sites subject to our Privacy Policy. Before disclosing your personal information on any other website, we recommend that you examine the terms and conditions and privacy policy of the relevant site. We are not responsible for any practices on linked websites that might breach your privacy.

8. Employee information

- 8.1 This Privacy Policy does not apply to the handling of information about employees by us. For information about our practices relating to employee information please contact info.au@schuelke.com

9. Recruitment

9.1 If you send us an application for a position, this information will be used to assess your application. This information may be disclosed to related bodies corporate and service providers for purposes such as:

- (a) aptitude, psychological and medical testing; and
- (b) other human resources management activities.

9.2 As part of the application process, you may be asked for your specific consent to the use and disclosure of certain personal information about any pre-employment medical examination or any aptitude or psychological testing. We may also ask you to consent to the disclosure of your personal information to those people who you nominated to provide references.

9.3 A refusal to provide any of this information, or to consent to its proposed disclosure may affect the success of the application.

9.4 You may also be asked whether you agree to your personal information being provided to our related bodies corporate for other positions relevant to your qualifications and experience.

10. Accessing and correcting the information we keep about you

10.1 If at any time you want to know exactly what personal information we hold about you, you are welcome to request access to your record by contacting us at info.au@schuelke.com . Our file of your information will usually be made available to you within 14 days.

10.2 If at any time you wish to change personal information that we hold about you because it is inaccurate or out of date, please contact us at info.au@schuelke.com and we will amend this record. If you wish to have your personal information deleted, please let us know in the same manner as referred to above and we will take all reasonable steps to delete it unless we need to keep it for legal reasons.

11. Security of your personal information

11.1 We will endeavour to take all reasonable steps to keep secure any information which we hold about you, and to keep this information accurate, up to date and complete. We require our employees and data processors to respect the confidentiality of any personal information held by us.

12. Retention of information

12.1 When we no longer need to use your information, we will take steps to properly de-identify or destroy it.

13. Contacting Us

13.1 If you have any concerns or complaints about how we handle your personal information, or if you have any questions about this policy, please contact us:

info.au@schulke.com

13.2 In most cases we will ask that you put your request in writing to us. We will investigate your complaint and will use reasonable endeavours to respond to you in writing within 30 days of receiving the written complaint. If we fail to respond to your complaint within 30 days of receiving it in writing or if you are dissatisfied with the response that you receive from us, you may have the right, depending on the jurisdiction, to make a complaint to the applicable regulator.

14. Future changes

- 14.1 We operate in a dynamic business environment. Over time, aspects of our business may change as we respond to changing market conditions. This may require our policies to be reviewed and revised. We reserve the right to change this Privacy Policy at any time and notify you by posting an updated version of the policy on its website. If at any point we decide to use personal information in a manner materially different from that stated at the time it was collected we will notify users by email or via a prominent notice on our website, and where necessary we will seek the prior consent of our users.