

CLEVERTRONICS PRIVACY POLICY

ABOUT THIS PRIVACY POLICY

Clevertronics Pty Ltd has obligations concerning the collection, use, disclosure and storage of personal information. These obligations are set out in the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (**Privacy Act**), and other applicable State and Territory privacy laws.

In this Privacy Policy, references to "Clevertronics", "we", "us" and "our" are to **Clevertronics Pty Ltd** (ACN 136 264 349).

This Privacy Policy covers the Clevertronics website and associated applications, including the 'Spec Builder' tool (together, the **Websites**).

Clevertronics is committed to protecting your privacy.

You consent to us collecting, holding, using and disclosing your personal information in accordance with this Privacy Policy.

We will review and may update this Privacy Policy from time to time.

WHAT IS PERSONAL INFORMATION?

"Personal information" is information or an opinion about an identified individual or reasonably identifiable individual, whether true or not and whether recorded in material form or not.

WHAT IS SENSITIVE INFORMATION?

"Sensitive information" is a sub-category of personal information which includes information about an individual's racial or ethnic origin, political opinions, membership of political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or certain biometric information.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

The types of personal information we may collect about an individual will depend upon the nature of our interaction with them.

During the provision of its products and services, Clevertronics generally only collects personal information about an individual to the extent they are acting as the representative and contact person (whether in their capacity as director, employee, contractor or otherwise) on behalf of a customer, supplier or other entity with which Clevertronics has a commercial relationship.

The personal information that we collect and hold may include an individual's:

- name;
- address;
- age and/or date of birth;
- email address;



- gender;
- health information
- criminal record information
- occupational and employment details including employment status and any previous work experience;
- cultural background;
- the location from which you have come to the site and the pages you have visited;
- information from or in connection with your resume or job application if you apply for a position with us;
- information provided to us via customer surveys; and
- technical data, which may include IP address, the types of devices you are using to access the Websites, device attributes, browser type, language and operating system; telephone number and other contact details.

HOW DO WE COLLECT PERSONAL INFORMATION?

We may collect personal information directly from the individual concerned or from a third party. We will only collect your personal information from a third party if it is unreasonable or impracticable to collect this information directly from you or if we are otherwise permitted to do so.

Generally, Clevertronics collects your personal information directly from you, through the completion of a manual or online form, an interaction or exchange in person or by way of telephone, facsimile, email, post or through the use of the Clevertronics website.

There may be occasions when Clevertronics collects your personal information from other sources, such as from:

- the entity you represent, where necessary for Clevertronics to provide its products and/or services to that entity through you;
- a credit reference listed in a credit application form;
- an existing or potential customer or supplier where they provide your details for the purpose of being a credit reference;
- an information services provider;
- a publicly maintained record or other publicly available sources of information including social media and similar websites; or
- if for recruitment purposes, an external recruitment or background screening services provider.

Specifically, we may collect your personal information:



- when you access any of the Websites, including the Spec Builder tool;
- when you request information about us;
- when you provide feedback to us;
- when you fill in a form on the Websites; and
- when you visit premises from which we operate.

If the personal information we collect includes sensitive information, including health information, we will ask for your consent to connect this sensitive information, unless the law allows us to collect it without your consent.

Can I remain anonymous?

You can always choose to deal with us anonymously or by using a pseudonym.

However, please note that if you choose to remain anonymous, this may affect your ability to access or use certain functions of the Websites.

If you wish to remain anonymous when dealing with us via a telephone call, please advise the call operator assisting you. Providing your personal details enables us to provide you with a contact record reference number which allows you, and other authorised persons, to retrieve information about that call at a later date.

EXEMPTIONS UNDER THE PRIVACY ACT

The employee records exemption set out in the Privacy Act applies to our acts and practices in relation to the handling of employee records by us in relation to current and former employment relationships. This Privacy Policy does not apply to our acts and practices in relation to employee records.

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

We collect, hold, use and disclose personal information for the following purposes:

- to provide our products and services including the design, supply and manufacture of emergency lighting, automated monitoring systems and sound evacuations solutions;
- to identify and communicate with you as a representative of a customer, supplier or other entity with which Clevertronics has or intends to have a commercial relationship;
- to fully utilise the 'Spec Builder' tool;
- to establish new points of contact with an existing or potential customer, supplier or other entity with which Clevertronics has or intends to have a commercial relationship;
- to assess whether Clevertronics will buy products or services from, sell products or services to, or otherwise grant an application for credit from, a particular entity;
- for accounting, billing and other internal administrative purposes;
- to identify and inform you of products and services from Clevertronics or selected third



parties that may be of interest to you or the entity you represent;

- to identify you as the author of any testimonial provided by you and published on our website or elsewhere (provided you consent);
- to assess your application for employment with Clevertronics or otherwise for the purpose of engaging you as a contractor or consultant;
- to enable us to provide you with requested information, products or services;
- to assist our users by providing them with information and support;
- to help us to manage and enhance goods and services we procure from our suppliers and subcontractors;
- to manage and administer any account you hold with us;
- to operate, improve and optimise our Websites and online services and yours and other users' experience;
- to send support and administrative messages, reminders, technical notices, updates, security alerts, and information to you;
- to send marketing and promotional messages to you and other information that has been requested or which may be of interest;
- to respond to any queries or complaints you have made; and
- to comply with our legal obligations.

DIRECT MARKETING

If you have agreed or asked, we may also use or disclose your personal information to provide you with information about promotions and other information which relates to our services, to invite donations or which we believe may be of interest to you. We may send you such information by email, telephone, SMS text message and/or any other form of electronic messages, post, fax or smartphone applications, social networking websites, Web 2.0 or any other method which becomes relevant from time to time.

When you provide us with information about yourself, you will usually be given the option to let us know that you do not want that information to be used for direct marketing purposes whether by ourselves or by any third party (including our commercial partners). If you do not take up that option, you will be taken to have agreed to the use of your information for marketing and promotional purposes.

You can change your mind about your direct marketing preferences at any time by contacting us using our contact details listed below. In addition, if you receive direct marketing from us by email or SMS message, you will be reminded in the email or SMS message that you are able to request a change to your preferences.

TO WHOM DO WE DISCLOSE PERSONAL INFORMATION?

We may disclose personal information to the following third parties for the purposes listed above:



- credit references listed in a credit application form;
- third parties engaged to perform administrative or other business management functions;
- people or entities considering acquiring an interest in Clevertronics' enterprise or assets;
- Clevertronics' professional advisors, contractors, consultants and related bodies corporate;
- insurance providers; and
- regulatory bodies.

Clevertronics' disclosures of your personal information to third parties are on a confidential basis or otherwise in accordance with law. Clevertronics may also disclose your personal information with your consent or if disclosure is required or authorised by law.

We may disclose personal information to external service providers so that they may perform services for us or on our behalf or to assist us in providing our programs, events and services or to administer our business.

We may also disclose your personal information to a purchaser or potential purchaser in connection with the sale or potential sale of Clevertronics, our business or any of our assets, including in insolvency, in circumstances which require the purchaser or potential purchaser to use such personal information consistently with this Privacy Policy.

Other permitted disclosures

We may disclose personal information in other circumstances, where the person concerned has consented to the disclosure, or where we are expressly permitted to do so by the Privacy Act or another law. These other disclosures may include where:

- you would reasonably expect the disclosure to occur (for example, quality assurance purposes or training);
- we are authorised or compelled by law to disclose;
- it will prevent or lessen a serious threat to someone's life, health or safety or a threat to public health or safety;
- it is necessary as part of the establishment or defence of a legal claim;
- it is requested by an enforcement agency such as the police; or
- it is a necessary part of an investigation following a complaint or incident.

Other uses and disclosures

We may collect, use and disclose your personal information for other purposes not listed in this Privacy Policy. If we do so, we will make it know to you at the time we collect or use your personal information.



DISCLOSURE OF PERSONAL INFORMATION OUTSIDE AUSTRALIA

Clevertronics operates in both Australia and New Zealand. Accordingly, Clevertronics may disclose personal information to recipients in New Zealand to the extent necessary to provide its products and/or services and for administrative or other business management purposes.

Overseas recipients may have different privacy and data protection standards. However, before disclosing any personal information to an overseas recipient, Clevertronics takes steps reasonable in the circumstances to ensure the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme unless you consent to the overseas disclosure or it is otherwise required or permitted by law.

If you have any queries or objections to such disclosures, please contact Clevertronics' Privacy Compliance Officer.

Cookies

A "cookie" is a small file stored by the web browser software on your computer when you access our Websites. An explanation of cookies can be found on the Office of the Australian Information Commissioner's (**OAIC**) [website](#).

We use session cookies for maintaining contact with a user throughout a web browsing session. Session cookies expire when the browsing session comes to an end or a user shuts down their computer.

We use persistent cookies for statistical purposes and to improve our Websites.

You may accept all cookies, reject all cookies or be notified when a cookie is set. However, if refuse the use of cookies by selecting the appropriate settings on your browser, this may prevent you from using the full functionality of the Websites.

We will deal with any personal information collected by cookies in the same way we handle other personal information under this Privacy Policy.

Web beacons

The website communications generated from using and/or registering on this Website, such as promotional emails, may contain electronic images known as "web beacons". Web beacons generally work in conjunction with cookies, and we may use them with cookies to, for example, count the number of visitors to the Websites or see whether you have acted on an email or clicked on a link, for example where this is a condition of entering a competition.

Google Analytics

Our Websites use Google Analytics, a web analytics service provided by Google Inc. (**Google**). Google Analytics uses cookies to help analyse how users use the Websites. Google Analytics anonymously tracks how users interact with the Websites, including where they came from, what they did on the Websites and whether they completed any transactions on the Websites.

The information generated by the cookie about your use of the Websites (including their IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of compiling reports on the Websites' activity and providing other services relating to the Websites and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties



process the information on Google's behalf. Google will not associate a person's IP address with any other data held by Google.

You can opt out of the collection of information via Google Analytics by downloading the Google Analytics Opt-out browser add-on [here](#).

Clickstream data

When you visit our Websites, a record is made of your visit, including the following information:

- your server address;
- your top level domain name;
- the date and time of access to the site;
- pages accessed and documents downloaded;
- the previous site visited; and
- the type of browser software in use.

We analyse this non-identifiable Website traffic data (including through the use of third party service providers) on an aggregated basis to improve our services and for statistical purposes.

No attempt will be made to identify users or their browsing activities except in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect the Internet Service Provider's log files.

Third party websites

The Websites may link to other websites which are outside our control, and other websites outside our control may link to the Websites. Whilst we try to ensure that we link only to websites which share our privacy and security standards, once you have left the Websites we cannot be responsible for the protection and privacy of any information which you provide on other websites. You should exercise caution and review the privacy statement applicable to the website in question.

SECURITY OF YOUR PERSONAL INFORMATION

We regard the security of your personal information as a priority and implement a number of physical and electronic measures to protect it. We remind you, however, that if you send information to the Websites, the internet is not a secure environment and although all care is taken by us, we cannot guarantee the security of information you provide to us via electronic means.

We have processes in place to ensure that our records remain accurate, complete and up to date, including by verifying your personal information with you each time you use our services or from other sources.

If the information is no longer required by us for any purpose for which it was collected and is no longer required by law to be retained by us, we will destroy or de-identify the information.



HOW CAN I ACCESS OR CORRECT MY PERSONAL INFORMATION?

We have measures in place to ensure that the information we hold about individuals is accurate, complete and up to date. If you learn that personal information we hold about you is inaccurate, incomplete or not up to date, you should contact us so that your information can be updated.

If you wish to see what information we hold about you, you can ask us for a copy.

Sometimes it may not be possible to give you a copy of the information if it was provided anonymously, if it contains details about other people, or if it would be unsafe to provide the information (for instance, if it may lead to harm being done to another person).

To obtain access to your personal information:

- you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- Clevertronics requests that you be reasonably specific about the information you require; and
- Clevertronics may charge you a reasonable administration fee, which reflects the cost to Clevertronics, for providing access in accordance with your request.

If we refuse to provide you with access to your record or to update your record in the way you request, we will provide you with written reasons.

If we refuse to correct or update your information, you may request that we make a note on your record that you are of the opinion that the information is inaccurate, incomplete, out of date, irrelevant or misleading, as the case may be.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

You will be notified of any likely costs before your request is processed.

HOW CAN I MAKE A COMPLAINT?

If you have a complaint or concern regarding our handling of your personal information or think that your privacy has been affected, you should contact us using our contact details set out below to raise your complaint or concern.



Please direct all privacy complaints to Clevertronics' Privacy Compliance Officer. At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect your existing obligations or affect the commercial arrangements between you and Clevertronics.

Clevertronics' Privacy Compliance Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.

CONTACTING US

If you:

- have any questions or would like further information about our Privacy Policy or practices,
- wish to make a complaint about the way we have collected, used, held or disclosed your personal information;
- would like to opt out of receiving our newsletter or information about Clevertronics products or services, please contact our office in any of the following ways:
 - **Email:** info@clevertronics.com.au
 - **Phone:** 03 9559 2700
 - **Mailing address:** 1 Caribbean Drive, Scoresby VIC 3179.

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