PRIVACY POLICY

MANAGEMENT OF PERSONAL INFORMATION

At Electro Chemical Engineering Pty Ltd t/as ECEFast (**we, our, us**), we recognise the importance of your privacy and understand your concerns about the security of the personal information you provide to us. We comply with the Australian Privacy Principles as contained in the *Privacy Act 1988* (Cth), and the New Zealand Information Privacy Principles as contained in the New Zealand *Privacy Act 2020* (**Privacy legislation**). The Privacy legislation details how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

Personal information is information and/or an opinion about an identified individual, or about an individual who is reasonably identifiable.

Sensitive Information, a sub-set of personal information, includes information or an opinion about (for example) an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information and genetic information.

This policy details how ECEFast manages personal information about you.

In the course of doing business, we endeavour to collect business information only. However, the collection of personal information in some instances is necessary or unavoidable.

What personal information we collect and hold

The kinds of personal information we collect from you or about you depend on the transaction you have entered into with us, the goods and services you or your organisation have contracted us to provide, and/or the goods and services you or your organisation are interested in.

If you are a current or prospective reseller of our goods, or a customer, then the kinds of personal information that we commonly collect and hold from you or about you include: your name, address, phone, fax and mobile numbers, email address, bank account or credit card payment details, and credit application and account information for trade reference and credit check purposes.

If you are a current or prospective reseller, then we may additionally collect and hold your business structure details and some sensitive information.

Cookies and Links to Other Websites

When you browse our website, contact us electronically, or engage with us on social media, we may also record geographical tagging, cookies, your IP address and statistical data from your activity. We may use your personal information to customise and improve your user experience on our website and other social media platforms. By using our website you agree that we can record this information from your device and access them when you visit the site in the future.

If you want to delete any cookies that are already on your computer, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies. Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our site.

Our website also contains links to other websites of interest (eg. the websites of our suppliers). However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

How we collect and hold personal information

ECEFast will only collect personal information by lawful and fair means, in accordance with the Privacy legislation.

We aim to collect personal information only directly from you, unless it is unreasonable or impracticable for us to do so. For example, we may collect personal information from you or about you (to the extent permissible by the Privacy legislation) from:

- correspondence that you submit to us and/or our resellers;
- telephone calls and meetings with us and/or our resellers;
- your activity on our website, our e-commerce site and social media platforms;
- from credit reporting bodies and other credit reference entities; and
- from publicly available sources.

However, if you are a customer, in some instances we may receive personal information about you from third parties, such as your local reseller. This may include product enquiries and/or delivery instructions etc.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for, or directly related to, us carrying out one or more of our business functions, activities and services. For example, if you are a customer, we collect, hold, use and disclose your personal information as necessary to provide our goods and services.

Whilst some of our goods are sold through select resellers, the majority of our goods are sold direct to customers. If you are a customer, and make an enquiry of us, we may disclose your personal information to a reseller if it is appropriate for them to assist you.

Generally, we do not collect sensitive or health information. However, we may collect sensitive information from you or about you where there is a legal requirement to do so, or it is directly relevant to the processing and assessment of your suitability for a credit account with us, or where we are otherwise permitted by law.

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction you have entered

into, or provide the goods and services that you or your organisation have contracted us to provide.

We also collect, hold, use and disclose your personal information for related purposes that you would reasonably expect, such as our administrative and accounting functions, record keeping, payment processing, reseller account trade references, fraud checks, providing you with information about other goods and services offered by us, providing you with information about new product launches, marketing and promotions, market research, newsletter communications, customer feedback and quality assurance surveys, statistical collation, social media analysis and website traffic analysis.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

Where we use your personal information for marketing and promotional communications, you can opt out at any time by notifying us. Opt out procedures are also included in our marketing communications.

We may also disclose your personal information to third parties:

- where required or permitted by law (e.g. to government departments and enforcement bodies);
- for the purpose of checking credit accounts and applications, e.g. CreditorWatch, illion); and
- for the purpose of marketing and promotions run by our third party service providers.

How we hold and store personal information

Your personal information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference and loss, and from unauthorised access, modification and disclosure.

- Data held and stored on paper is stored in lockable filing cabinets. Our premises has secured entry and monitored alarms.
- Data held and stored electronically, including “in the Cloud”, is protected by internal and external firewalls, limited access via file, user password and network passwords, and files can be designated read-only or no access. We also require our IT contractors and other third parties to implement privacy safeguards.

Destruction and De-identification

We will retain your personal information whilst it is required for any of our business functions, or for any other lawful purpose.

We will take reasonable steps and we will use secure methods to destroy or to permanently de-identify your personal information when it is no longer required for any purpose for which the personal information may be used under this Policy and otherwise in accordance with the Privacy legislation.

As an example, our destruction and de-identification methods may include:

- Paper records being placed in security bins and shredded; or
- Electronic records being deleted from all locations, to the best of our ability, or encrypted and/or placed beyond use.

Overseas disclosure

Our business has offices in Australia and New Zealand. In the course of doing business with you, we may disclose some of your personal information between our respective offices, however, we will only do so where:

- it is necessary to complete the transaction you have entered into; and
- you have provided consent; or
- we believe on reasonable grounds that the overseas recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the Privacy legislation; or
- it is otherwise permitted by law.

Requests for access and correction

We will take reasonable steps to ensure that the personal information we use or disclose is accurate, complete and up to date, having regard to the purpose of the use or disclosure.

We rely on the personal information we hold about you to efficiently provide our goods and services. For this reason, it is very important that the personal information we collect from you is accurate, complete and up-to-date. To assist us to keep our records up-to-date, please notify us at privacy@ecefast.com.au of any changes to your personal information.

We have procedures in place for dealing with and responding to requests for access to, and correction of, the personal information held about you.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why. For further information, please contact us at privacy@ecefast.com.au

Data Breaches

If we suspect that a data breach has occurred, we will undertake an assessment into the circumstances of the suspected breach. Where it is ascertained that a breach has actually occurred and where required by law, we will notify the Office of the Australian Information Commissioner (in Australia) or the Office of the Privacy Commissioner (in New Zealand) and affected individuals as soon as practicable after becoming aware that a data breach has occurred.

Complaints and Concerns

We have procedures in place for dealing with complaints and concerns about our practices in relation to the Privacy legislation and any alleged breach of this Policy. We will respond to your complaint in accordance with the relevant provisions of the Privacy legislation.

For further information, please contact us privacy@ecefast.com.au

Our Privacy Officer can be contacted to discuss or attempt to resolve any complaints relating to the collection, storage and use of your personal information. For further information, please contact our Privacy Officer at privacy@ecefast.com.au

Local Laws and Regulation

This Privacy Policy is intended to be in compliance with the privacy legislation applicable in Australia and New Zealand. To the extent the laws of a country prohibit us from using and sharing personal information in a way described in this Privacy Policy, the Privacy Policy and our practices shall be deemed modified to be consistent with such local laws.

Contact

Privacy Officer
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Notting Hill
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