

Privacy Policy

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Elton Group Pty Ltd ACN 099 878 878 and its related bodies corporate (Elton Group, us, we, our) understand that privacy is important to you and is committed to complying with its obligations under the Privacy Act 1988 (Cth) (Privacy Act), which includes the Australian Privacy Principles. This Privacy Policy describes how we collect, use, disclose, store, and handle your personal information and outlines the measures and processes that we have put in place to ensure its adequate protection.

What is personal information?

In this Privacy Policy, 'personal information' has the meaning set out in the Privacy Act. In general terms, personal information is information (whether fact or opinion) about an individual who is identified or reasonably identifiable.

Some types of personal information are designated as 'sensitive information', which are subject to additional protection under the Privacy Act.

What personal information does Elton Group collect?

We collect personal information about you in the course of operating our business and providing our goods and services to you. The types of personal information we collect about you will depend on the purpose for which the personal information is collected. This can include:

- if you have requested to receive news or information about Elton Group's goods or services – your name, address and contact details;
- if you have requested to purchase goods or services or order samples from us – your name, email address, contact details, requested goods or services, your photo ID (driver's licence, forklift licence, Government issued photo identification, passport and birth certificate), bank account details for any payment or reimbursement to you, credit card and log in details for online products and services, registration details, date of birth or age group, occupation, gender, business details including but not limited to the ABN/ACN;
- if you have contacted us to make a complaint, provide feedback, submit an enquiry, or request a call-back—your name and contact details;
- in the case of prospective employees or contractors – information contained in your application, cover letter or résumé, recorded during any interview, or obtained through any pre-employment checks, and government-issued identifiers such as tax file numbers; and
- in the case of our suppliers and distributors – your name, mailing or street address, email address, telephone number(s), answers you provide to questions we ask, details of any enquiry you make with us or feedback you give us, your role and responsibilities if you represent a corporate client and other information in relation to your dealings with Elton Group.

We may also collect personal information about you from third parties where you have consented to this or the information is publicly available.

Generally, we will not collect sensitive information about you. However, in certain circumstances, we may need to collect sensitive information. Under the Privacy Act, and for the purposes of this Privacy Policy, "sensitive information" is a subset of personal information that is generally afforded a higher level of privacy protection (e.g. details of race, religious beliefs, sexual orientation, health information etc.). Elton Group does not generally require customers to disclose any sensitive information to us.

Elton Group only collects sensitive information where it is reasonably necessary for our functions or activities and either the individual has consented, or we are required or authorised by or under law to do so. In limited circumstances, we may require prospective employees and individual contractors to provide us with certain health information.

If you do provide sensitive information to us for any reason (for example, if you provide us with information about a disability you have or your vaccination status), you consent to us collecting that information and to us using and disclosing that information for the purpose for which you disclosed it to us and as permitted by the Privacy Act and other relevant laws.

We may also collect technical information and general analytics arising from your use of our website, such as:

- the number of page views (or page impressions) that occur on our website;
- the number of unique visitors;
- how long these unique visitors (on average) spend on our website; and
- common entry and exit points to our website.

When you provide us with personal information or receive our goods or services, you consent to us collecting, using and disclosing your personal information in accordance with this Privacy Policy, or otherwise for such purposes and in such ways as we may communicate to you from time to time.

In addition to the types of personal information identified above, Elton Group may collect personal information as otherwise permitted or required by law.

How does Elton Group collect personal information?

We collect your personal information directly from you in a number of ways, including:

- when you access or use our website;
- directly from you when you provide it to us or our agents or contractors, in person, by telephone or email;
- when you make inquiries about Elton Group or our goods or services or otherwise communicate with us by email, telephone, in person or via our website or otherwise; and
- when you apply to work with us or are engaged by us as a contractor.

Where it is reasonable and practicable to do so, we will only collect personal information about you from you directly and not from third parties.



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We may also use website traffic tracking technology to collect technical information and general analytics. By using our website, you consent to the use of website traffic tracking technology in accordance with this Privacy Policy.

Can you choose not to disclose your personal information?

If you contact us to make a general enquiry about Elton Group or our goods or services, you do not have to identify yourself or provide any personal information. Alternatively, you can also notify us that you wish to deal with us using a pseudonym.

However, if we are not able to collect personal information about you, we may not be able to provide you with the information or assistance you require. For example, we will not be able to send you information you have requested if you have not provided us with a valid email address or telephone number.

How does Elton Group use personal information?

Generally, we use your personal information for purposes connected with our business or our goods or services.

Some specific purposes for which we use your personal information are as follows:

- to provide our goods or services to you or to receive goods or services from you;
- to respond to your questions or complaints;
- to manage our internal business operations;
- to protect and/or enforce our legal rights and interests, including defending any claim, demand, legal proceeding, cause of action or other dispute arising from, or in connection with, the operation of our business;
- to confirm whether any security interests are recorded against you;
- to receive payment from you or remit funds to you and (where applicable) financiers;
- to record and maintain the details of your purchase of an Elton Group good or service for warranty purposes or your purchase of an Elton Group good or service for administration purposes;
- to provide (or arrange third parties to provide) additional goods or services in respect of goods or services purchased from us;
- to improve our goods or services;
- to contact you (directly or through our service providers and marketing research agencies) to obtain your feedback and to find out your level of satisfaction with our goods or services through surveys;
- to verify your identity;
- to promote our goods and services;
- to collect goods from sellers and deliver them to buyers or other parties;
- to co-ordinate third party carriers to transport goods between parties;
- to consider you for a job at Elton Group (whether as an employee or contractor) or other relationships with us; and
- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

Elton Group will not use personal information for any other purposes unless otherwise permitted or required by law, or with your prior consent.

Technical information and general analytics may be used for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are on our website, and to improve our website and our goods and services.

To whom may Elton Group disclose personal information?

We may disclose your personal information to third parties in connection with the purposes described above (see the "How does Elton Group use personal information?" section). This may include disclosing your personal information to the following types of third parties:

- our related companies;
- any potential third party acquirer of our business or assets, and advisors to that third party;
- our professional advisers (such as lawyers, accountants or auditors) and insurers, including where a claim, demand, legal proceeding, cause of action or other dispute arising from, or in connection with, the operation of our business is made against us;
- our employees, contractors and third party service providers who assist us in performing our functions and activities;
- other persons who perform services for, or in connection with, Elton Group (including to facilitate the delivery of goods or services, electronic direct mailing, for credit card payment authorisation, for data storage, for trend analysis, for functions and events, for market research, for marketing and promotions and for the provision of statistical sales information);
- organisations authorised by us to conduct promotional, research or marketing activities;
- government and regulatory authorities and other organisations, enforcement or exchange bodies or courts;
- third parties to whom you have authorised us to disclose your information (e.g. referees); and
- any other person as required or permitted by law.

If we disclose your personal information to third parties we will use reasonable commercial efforts to ensure that such third parties only use your personal information as reasonably required for the purpose of disclosure and in a manner consistent with applicable laws, for example (where commercially practical) by including suitable privacy and confidentiality clauses in our agreement with a third party service provider to which we disclose your personal information.

Direct marketing communications

We may send you direct marketing communications from time to time (either through mail, SMS or email), including offers any news and exclusive offers, promotions, or events, where it is appropriate to the purpose for which your personal information was collected.

You may opt-out of receiving direct marketing communications at any time by contacting us or by using opt-out facilities provided in the direct marketing communications.



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Does personal information leave Australia?

We may disclose your personal information to overseas recipients, such as to our service providers. This includes cloud servers that may be located outside of Australia. Except where an exception applies under the Privacy Act or other relevant legislation, we will take commercially reasonable steps to ensure that overseas recipients to whom we disclose personal information do not breach the Australian Privacy Principles stated in the Privacy Act in relation to such information.

Security

Elton Group takes reasonable steps to ensure the security of your personal information. However, you should be aware that the internet is not a secure environment, we cannot guarantee the security or transmission of personal information you disclose to us online. Accordingly, you transmit your personal information to us online at your own risk.

Please notify us immediately if you become aware of any breach of security.

How long do we keep your personal information?

Generally, we will retain your personal information for the period necessary for the purposes for which your personal information was collected (as outlined in this Privacy Policy) unless a longer retention period is required by law or if it is reasonably necessary for us to comply with our legal obligations, resolve a dispute or maintain security.

To the extent you provide us with any credit card information or bank account details for the purposes processing payments for goods, services or samples that Elton Group may provide to you, once payment has been processed and authorised, we then endeavour to securely destroy or deidentify such personal information.

Access to and correction of personal information

You may request access to your personal information held by Elton Group at any time by contacting us. We will provide access to that information in accordance with the Privacy Act, subject to any exemptions that may apply. We may charge an administration fee in limited circumstances, for example if we are required to.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it by contacting us.

What is the process for complaining about a breach of privacy?

If you have any questions, concerns or complaints about our collection, use, disclosure or management of your personal information, please contact us in writing using the contact details below. We will make inquiries and your complaint will be assessed by an appropriate person with the aim of resolving any issue in a timely and efficient manner.

If you are unsatisfied with the outcome, we will advise you about further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner.

Local exemptions and inconsistency with law

Where local laws allow for an exemption to compliance with certain legal obligations (for example, the employee records exemption), we may rely on such an exemption.

This Privacy Policy will not apply to the extent that it is inconsistent with any applicable law.

Cookies

We may use cookies (a small data file with an alphanumeric identifier that we transfer to your computer's hard drive so that we can recognise your browser) to monitor your use of our website and personalise certain features of our website for you. While cookies do not normally contain personal information, if you have provided us with personal information as part of using our website then the cookies we use may be associated with that personal information to enable us to increase the personalisation of our website for you.

You may disable cookies or instruct your browser to stop accepting them by changing the settings on your browser, although this may mean that you cannot use all of the features of our website.

Changes to this Privacy Policy

Elton Group may change this Privacy Policy from time to time at our discretion, including to maintain our compliance with applicable laws and regulations or following an update to our internal practices, policies and procedures. Amendments to this Privacy Policy will be posted on our website. Your continued dealings with us, for example use of our website or purchase of our goods or services, will signify your agreement to this Privacy Policy as amended.

How to contact us

If you have a query, concern or complaint about the manner in which your personal information has been collected or handled by us or would like to request access to or correction of the personal information we hold about you, please contact using the details provided below:

Attention: Managing Director
1 – 5 Brough Street, Springvale, Victoria, 3171
accounts@eltongroup.com

