

Clevertronics International UK Ltd
11249539

PRIVACY STATEMENT

1 Your rights in relation to privacy

Clevertronics International UK Ltd (Clevertronics) 11249539 and registered VAT number 303 6051 50 with the registered address of 843 Finchley Road, London. United Kingdom NW11 8NA, understands the importance of protecting the privacy of personal information. This statement sets out how Clevertronics aims to protect the privacy of your personal information, your rights in relation to your personal information managed by Clevertronics and the way Clevertronics collects, holds, uses and discloses your personal information. In handling your personal information, Clevertronics International UK Ltd will comply with *the Data Protection Act 2018*.

2 What kinds of personal information does Clevertronics collect?

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

If you are a representative of a customer, supplier or other entity with which Clevertronics has a commercial relationship, generally, the kinds of personal information Clevertronics collects about you include:

- ◆ your name and contact details such as telephone and fax numbers and email and postal addresses; and
- ◆ information about your role.

Clevertronics also collects personal information about you if you are applying for a role within Clevertronics including information about your skills, qualifications and employment history and, if relevant, sensitive information including health and/or criminal record information necessary for Clevertronics' assessment of whether you are able to perform the inherent requirements of the particular role.

Clevertronics may also hold other personal information about you that you provide to Clevertronics.

3 How does Clevertronics collect personal information?

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.

Generally, Clevertronics will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you.

4 Why does Clevertronics need your personal information?

Clevertronics collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of:

- ◆ providing its products and services including the design, supply and manufacture of emergency lighting, automated monitoring systems and sound evacuations solutions;
- ◆ identifying and liaising with you as a representative of a customer, supplier or other entity with which Clevertronics has or intends to have a commercial relationship;
- ◆ establishing 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;
- ◆ assessing whether Clevertronics will buy products or services from, sell products or services to, or otherwise grant an application for credit from, a particular entity;
- ◆ accounting, billing and other internal administrative purposes;

- ◆ identifying and informing you of products and services from Clevertronics or selected third parties that may be of interest to you or the entity you represent;
- ◆ identifying you as the author of any testimonial provided by you and published on our website or elsewhere (provided you consent); and
- ◆ assessing your application for employment with Clevertronics or otherwise for the purpose of engaging you as a contractor or consultant.

Clevertronics may also use your personal information for purposes related to the above purposes and for which you would reasonably expect Clevertronics to do so in the circumstances, or where you have consented or the use is otherwise in accordance with law.

Where personal information is used or disclosed, Clevertronics takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to Clevertronics. However, without certain information from you, Clevertronics may not be able to provide its products and/or services to you and/or the entity you represent.

5 To whom does Clevertronics disclose your personal information?

Clevertronics discloses your personal information for the purpose for which Clevertronics collects it. That is, generally, Clevertronics will only disclose your personal information for a purpose set out at paragraph 4. This may include disclosing your personal information to:

- ◆ 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.

6 Overseas disclosure

Clevertronics operates in the United Kingdom, Australia and New Zealand. Accordingly, Clevertronics may disclose personal information to recipients in Australia and 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 on the details set out in paragraph 10.

7 Direct marketing

Clevertronics may use and disclose your personal information in order to inform you of products and services that may be of interest to you. In the event you do not wish to receive such communications, you can opt-out by contacting Clevertronics via the contact details set out in paragraph 10 or through any opt-out mechanism contained in a marketing communication to you.

8 Security of your personal information

Clevertronics takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. Clevertronics holds personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff.

Clevertronics will destroy or de-identify personal information in circumstances where it is no longer required, unless Clevertronics is otherwise required or authorised by law to retain the information.

9 Can you access and correct the personal information that Clevertronics holds about you?

Clevertronics takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that is collected and held by Clevertronics. If at any time you would like to access or correct the personal information that Clevertronics holds about you, or you would like more information on Clevertronics' approach to privacy,

please contact Clevertronics' Privacy Compliance Officer on the details set out in paragraph 10 below. Clevertronics will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

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 Clevertronics refuses your request to access or correct your personal information, Clevertronics will provide you with written reasons for the refusal and details of complaint mechanisms. Clevertronics will also take steps reasonable in the circumstance to provide you with access in a manner that meets your needs and the needs of Clevertronics.

Clevertronics will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

10 How to contact us

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications, please contact Clevertronics' Privacy Compliance Officer at info@clevertronics.com.au

11 Privacy complaints

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.