

## Scott Bader – Australian Privacy Policy

### INTRODUCTION

Scott Bader Australia Pty Ltd (ACN 640 312 170), and its Australian subsidiaries and affiliates (collectively referred to as **Scott Bader Australia**) are committed to complying with obligations under the *Australian Privacy Act 1988* (Cth) (the '**Privacy Act**') (including the Australian Privacy Principles set out in the Privacy Act (the 'APPs')), respectively, and other applicable data privacy laws which apply to us.

In this Privacy Policy, '**we**', '**us**' and '**our**' refers to Scott Bader Australia and '**you**' refers to any individual about whom we collect personal information.

Scott Bader Australia's ultimate parent company is Scott Bader Limited which has subsidiaries, affiliates and operations around the world (collectively the **Scott Bader Group** and each a **Scott Bader Group Company**). This Privacy Policy only applies to the handling of Personal Information by Scott Bader Australia and does not apply to govern other global Scott Bader Group Companies which are not located in Australia. We have a separate [global privacy policy](#) that applies to the Scott Bader Group.

This Privacy Policy applies to all Personal Information that Scott Bader Australia collects, uses, discloses, stores and handles, including Personal Information collected through our websites.

In this policy, '**Personal Information**' means information or an opinion about an identified individual, or an individual who is reasonably identifiable, directly or indirectly, and any other information that is deemed personal information under applicable law.

Scott Bader Australia also has a specific Credit Policy (available at **Attachment A**) in relation to the collecting and handling of credit information and credit eligibility information, including credit related Personal Information, which applies in addition to this Privacy Policy where Scott Bader Australia collects, holds or uses this kind of information in Australia or through our Australian businesses.

### OTHER TERMS WHICH APPLY

Other terms may also apply to you and the Personal Information we hold about you. For example, if you are employed with us you may have specific privacy terms in your employment contract with us.

Sometimes we also provide a privacy collection statement at the time we collect Personal Information from you. This privacy collection statement may include additional terms.

### COLLECTION OF PERSONAL INFORMATION

#### How Personal Information is collected by Scott Bader Australia

Scott Bader Australia distributes Scott Bader Group products and other products manufactured by other providers for the composites industry throughout Australia, including Scott Bader Limited's Crystic Polyester Gelcoats & Resins, Vinyl Ester Resins, Crestomer & Crestabond Adhesives, in addition to Cadox MEKP Catalysts, Jushi & CTG Glass Reinforcements, Corecell Foams, Epoxy Resins, Multi-Axial Fabrics and a vast range of ancillary products. We collect Personal Information so that we can provide our goods and services in Australia, and information about those goods and services, to customers, end users and other interested parties.

We collect most Personal Information directly from you. For example, we will collect your Personal Information from you when you:

- do business with us, either as a distributor, customer or supplier or a potential distributor, customer or supplier;
- complete our Contact form or join our mailing list;
- make an enquiry via telephone or email;
- register on our websites;
- interact with our sites, services, content and advertising;
- submit your resume;
- request information from Scott Bader Australia;
- communicate with us through correspondence, chats, email, over the phone or when you share information with us through other social applications, services or websites;
- provide your Personal Information to us in person, for example at an industry trade show or event;
- apply to any funding scheme; or
- apply for a credit account with us.

Sometimes we may collect Personal Information about you from other people or organisations. This may happen without your direct involvement. For example, we may collect Personal Information about you from:

- an other Scott Bader Group Company;
- one of our distributors or other business contacts that buy, use and/or distribute our products
- any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract;
- any third-party social media platform such as LinkedIn or Google+ in connection with our recruitment and HR processes; or
- if you apply for a credit account with us, from credit providers and credit reporting bodies.

**What kinds of Personal Information does Scott Bader Australia collect and hold?**

The kinds of Personal Information we collect will depend on the purpose(s) for which we are collecting it. For example, in each of the instances above, we may collect:

- your name;
- e-mail address;
- phone number;
- mailing address;
- age or date of birth;
- employment details (such as work address and job title);
- position and contact telephone number;
- payment details;

- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from our sites, ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- credit information, including any late or outstanding payment you owe to us;
- your activity on our websites, or services;
- any additional information relating to you that you provide to us directly through our website, or indirectly through your use of our website or online presence or through other social applications, services, websites or accounts from which you permit us to collect information;
- information you provide us through customer surveys; and
- other Personal Information that may be required in order to facilitate your dealings with us.

If you do not provide certain requested Personal Information to Scott Bader Australia, Scott Bader Australia may not be able to provide you with access to Scott Bader Australia's products and services, or fulfil one or more of its functions and activities applicable to you.

Additional information on certain categories of Personal Information which Scott Bader Australia collects are set out below.

#### **Personal Information relating to employees, applicants and contractors**

When you apply for a job or position with us or become a contractor or vendor, we may collect certain Personal Information from you (including your name, address, contact details, country of residence, working history, education history, qualifications, social security number, employer identification number, tax information, banking information and relevant records checks) as part of the application or onboarding process.

If you are or have previously been employed by us in Australia, this Privacy Policy does not apply to our acts and practices in relation to employee records of our current and former employees in Australia, which are exempt from the Privacy Act.

#### **USE AND DISCLOSURE OF PERSONAL INFORMATION**

##### **The purposes for which information is collected, used and disclosed**

The purposes for which we usually collect, use and disclose Personal Information depends on the nature of your interaction with us, but may include the following purposes:

- to enable you to access and use our products and services if you are a customer or other business partner;
- to manage our relationship with you, for example if you are a distributor or supplier;
- to assess your credit application, service and manage any credit account, register any security interests and when necessary, undertake debt recovery action;
- to operate, protect, improve and optimise our products, websites, services, business and our users' experience, such as to perform analytics, conduct research and training and for advertising and marketing;
- to send you products, services, support and administrative messages, reminders, technical notices, updates, alerts, and information requested by you;

- subject to possible limitations and qualifications set out in applicable laws, to send you marketing and promotional messages and other information and offers that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- subject to possible limitations and qualifications set out in applicable laws, to administer contests or other promotional activities or events sponsored or managed by us or our business partners;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties;
- to consider your employment application and where applicable, to carry out the employment relationship;
- to respond to requests for information and other general inquiries about our products and services;
- to innovate our delivery of products and services; and
- in the event of late payment or bankruptcy, to collect funds due to us.

#### **Direct marketing**

We and/or our carefully selected business partners may send you direct marketing communications, information and offers about services and products that we think may interest you. This may take the form of emails, SMS, mail or other forms of communication. You may opt-out of receiving marketing communications from us by contacting our Privacy Officer using the details set out below or by using the opt-out facilities provided in our communications (e.g. an unsubscribe link).

Where required by applicable law, we will only send you email or SMS marketing emails with your consent.

#### **Disclosure of Personal Information**

Subject to restrictions and conditions set out in applicable laws, we may disclose Personal Information for the purposes described in this Privacy Policy to:

- other Scott Bader Group Entities;
- third party suppliers, distributors and service providers (including providers for the operation, optimisation or promotion of our products and/or our business, in connection with your employment application or in connection with providing our products and services to you);
- professional advisers, dealers and agents;
- payment systems operators (e.g. merchants receiving card payments);
- our existing or potential distributors, business partners or other partners;
- our sponsors or promoters of any competition that we conduct via our services;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us;
- credit reporting bodies and credit providers; and
- other persons, including government agencies, regulatory bodies, courts, tribunals, law enforcement agencies, arbitrators, mediators or conciliators, as required, authorised or permitted by law, including in connection with disputes or litigation.

#### **Disclosure of Personal Information outside of Australia**

As we are part of the global Scott Bader Group, we may disclose your Personal Information outside of Australia. This includes to another Scott Bader Group Entity located in the United Kingdom, France, Iberica, Ireland, Germany, South Africa, Scandinavia, Croatia, Japan and other Asia-Pacific countries, and in other regions such as Eastern Europe s.r.o., the Middle East and North America including where that Scott Bader Group Entity provided back-end services to us.

It is likely that your Personal Information will be disclosed to other overseas recipients including service providers who may handle, process or store your personal information on our behalf. These overseas recipients are likely to be located in one of the jurisdictions set out above.

Disclosures of Personal Information outside of the country where the Personal Information was collected will be carried out in compliance with applicable laws which may include obtaining consent or requiring compliance with applicable laws through contractual obligations. As a result of these disclosures the Personal Information may be subject to the laws of jurisdictions other than your own country.

## **SECURITY OF PERSONAL INFORMATION**

We may hold your Personal Information in either electronic or hard copy form. We take reasonable steps to protect and secure your Personal Information from misuse, interference and loss, as well as from unauthorised modification, access or disclosure. We use a number of appropriate physical, administrative, personnel and technical measures for such protection of your Personal Information. For example, we may implement data encryption for data at rest and in transit, multi-factor encryption, access restrictions, as well as other controls necessary to secure such data. However, we cannot guarantee the security of your Personal Information.

## **PRIVACY AND DATA SECURITY ON OUR WEBSITES**

### **Cookies**

We may use 'cookies' or other similar tracking technologies on our websites that help us track your website usage and remember your preferences. A cookie is a small data file that can be used to track internet use. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. More information about cookies can generally be found in the "help" (or similar) section of your computer's internet browser.

At Scott Bader Australia, we primarily use cookies to help us determine which to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Scott Bader Australia has no desire or intent to infringe your privacy while using our websites. Cookies can be either "persistent" or "session" based. Persistent cookies are stored on your computer, contain an expiration date, and may be used to track your browsing behaviour upon return to the issuing website. Session cookies are short-lived, are used only during a browsing session, and expire when you quit your browser.

When you first access our websites you will be given the choice to enable or disable cookies through our cookie banner.. You can also disable cookies on your web browser. For instructions on how to block or delete cookies please consult your browser's privacy or help documentation. Disabling cookies may interfere with your use and enjoyment of our websites.

### **Third Parties and Interest-based Advertising**

Scott Bader Australia does not sell Personal Information to third parties. Scott Bader Australia may permit third parties to collect Personal Information through our websites and share Personal Information with third parties for business purposes. These business purposes are described above and include providing advertising on our websites and elsewhere based on users' online activities over time and across different

sites, services, and devices (so-called “interest-based advertising”). The information practices of these third parties are not covered by this Privacy Policy. Some of these companies are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies

### **Do-Not-Track Signals and Similar Mechanisms**

Some web browsers transmit “do-not-track” signals to websites. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.

### **Third-party sites**

Please be aware that our websites contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. The information practices of those third-party websites linked to the Scott Bader Australia websites and apps are not covered by this Privacy Policy. The privacy policies that apply to those other websites may differ substantially from this Privacy Policy, so we encourage you to read them before using those websites.

### **Secrecy of passwords and account information**

You are solely responsible for maintaining the secrecy of your passwords or any account information. Please be careful and responsible whenever you’re online. If you post Personal Information online that is accessible to the public, you may receive unsolicited messages from other parties in return. While we strive to protect your Personal Information, Scott Bader Australia cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk.

### **ACCESS TO AND CORRECTION OF PERSONAL INFORMATION**

You may request that Scott Bader Australia confirm whether it holds any Personal Information about you and, where applicable, request that Scott Bader Australia provide you with a copy of your Personal Information. Sometimes, we may not be able to provide you with access to all of your Personal Information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your Personal Information.

If you think that any of the Personal Information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

### **How to make a complaint**

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your Personal Information, you can contact us using the details set out below. You should include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you are unhappy with our response to your complaint, please let us know and we will provide you with information about the further steps you can take.

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that we may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website [www.oaic.gov.au](http://www.oaic.gov.au).



Some specific processes and procedures apply to queries and complaints regarding credit related Personal Information. Please refer to our Credit Policy available at Attachment A.

### **Contacting Scott Bader Australia**

If you have any questions about Scott Bader Australia's handling of Personal Information, or if you wish to make an access or correction request or complaint, you should contact the Scott Bader Australia Privacy Officer by one of the following methods:

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| <b>By telephone:</b> | +61 8 9418 4555 / + 971 566 44 9524                    |
| <b>By email:</b>     | david_rossouw@scottbader.ae                            |
| <b>By post:</b>      | P.O. Box 16785, Jebel Ali, Dubai, United Arab Emirates |

### **General**

This policy was issued on 19 June 2020.

Scott Bader Australia may make changes to this Privacy Policy from time to time by publishing changes to it on our websites. We encourage you to check our websites periodically to ensure that you are aware of our current Privacy Policy.