



# SUPPLY NETWORK GROUP PRIVACY POLICY

## Your Privacy Is Important

Supply Network Limited and its subsidiaries (together **SNL, we, us, our** and other similar expressions) respect your privacy. All our staff are required to read this policy and understand their responsibilities when dealing with personal information. This policy is designed to comply with both Australian and New Zealand law.

In this privacy policy:

<b>Multispares</b>	means Multispares Limited or Multispares NZ Limited, each a wholly owned subsidiary of Supply Network Limited, as appropriate to the context;
<b>Australian Act</b>	means the <i>Privacy Act 1988</i>
<b>New Zealand Act</b>	means the <i>Privacy Act 1993</i>
<b>IPPs</b>	means the Information Privacy Principles in the New Zealand Act;
<b>APPs</b>	means the Australian Privacy Principles in the Australian Act;
<b>'personal information'</b>	means: <i>under the Australian Act</i> , information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not; <i>under the New Zealand Act</i> , any information about an identifiable individual; and sensitive information refers to information about a person's racial or ethnic origin, political opinions or associations, religious beliefs or affiliations, philosophical beliefs, trade and professional memberships, sexual preferences or practices, criminal record or health information; and
<b>Website</b>	means the websites available from <a href="http://www.supplynetwork.com.au">www.supplynetwork.com.au</a> , <a href="http://www.multispares.com.au">www.multispares.com.au</a> , and <a href="http://www.multispares.co.nz">www.multispares.co.nz</a> .

## Supply Network

Supply Network Limited is the listed holding company of a group of related entities dealing in the importation, distribution and sale of components to the road transport industry. Each of these subsidiaries operates as an independent company with its own management team and its own market focus. Supply Network's interests are based in the Australian and New Zealand markets where the subsidiaries already have a significant presence. It seeks to add value to its subsidiaries by supporting management process, providing appropriate financial resource and leveraging information technology investments. By networking separate business units each with a different focus Supply Network aims to improve service levels and lower the cost of components to the industry.

## Multispares

Multispares has been importing and distributing truck and bus parts in Australia for more than 40 years. It operates an integrated network of branches across Australia and New Zealand and has grown to become the region's largest independent supplier of high quality replacement parts.



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## Compliance with Privacy Principles

In Australia, SNL is bound by the APPs. In New Zealand SNL is bound by the IPPs. SNL has adopted internal policies and procedures to ensure that your personal information is dealt with in accordance with both the Australian Act and the New Zealand Act as appropriate. You can see the full text of the APPs and the IPPs online at <http://www.oaic.gov.au/> and [www.privacy.org.nz](http://www.privacy.org.nz) respectively.

## Collection of Personal Information

We may need to collect personal information about you and others including names, addresses, phone numbers and other contact details. We may also collect details of the age, sex, credit card details (if you buy products or services from us), and other personal information about you or others.

If we are not provided with all the personal information we request, we may be unable to do business with you or others.

Where possible we will collect personal information directly from the individual concerned, for example through information provided to us in writing, electronically or by telephone. Personal information may be collected by us when:

- we are contacted about our products and services, in person, over the telephone or over the Internet;
- we negotiate and enter into business transactions;
- we provide products and services to customers;
- we receive an application for employment (in which case we will usually retain the information for up to 12 months, and may use it to contact the applicant in that period in relation to potential employment with SNL); or
- we respond to an inquiry, where we consider personal details are required or appropriate to fulfil the query.

However, occasionally we may need to collect personal information about an individual from someone other than that individual, for example where an individual's representative holds personal information (e.g. financial or bank account details or a credit reference) that we may need to access for particular dealings or other purposes. Where we are at liberty to do so, we will use our best endeavours to seek an individual's consent before obtaining their personal information from third parties.

Any additional purpose for the collection (not included in this policy) will be identified when we collect personal information, or as soon as practicable afterwards.

## Collection of Credit Information

If you are a customer and we give you credit, we may also collect credit information or credit eligibility information about you. Credit information and credit eligibility information are particular types of personal information.

The credit information and credit eligibility information we may collect about you includes: identification information; credit liability information; repayment history information; details of any request for your information that we receive from a credit provider, mortgage insurer or trade insurer information; the type and the amount of credit sought; default information; payment information; court proceedings information; personal insolvency information; information about any serious credit infringement by you; information disclosed in reports obtained from credit reporting



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bodies; information from property searches; information provided by trade references.

We generally collect your credit information or credit eligibility information directly from you, for example, if you complete an Application for Trading Account.

We may also collect credit information or credit eligibility information about you from third parties. For example, from your employer, any other organisation with whom you have any dealings, credit reporting bodies such as Veda, or from publicly maintained records.

The purpose for which we may collect, hold, use and disclose credit information or credit eligibility information about you, is so we can assess whether to extend credit to you or to a customer (if you have given a personal guarantee in respect of that customer).

If permitted under each Privacy Act, we may disclose credit information or credit eligibility information about you to your employer, any other organisation with whom you have any dealings, credit reporting bodies, creditors, other traders in the markets we trade in, our commercial customers, our suppliers and to retailers of our products.

### **Sensitive Information**

We generally do not need to collect “sensitive information” (as defined in the Australian Act) about individuals, however we will collect such information from applicants for employment with us. Where we are at liberty to do so, and it is practicable to do so, we will seek the consent of the individual concerned before collecting their sensitive information and inform them of the purpose at the same time.

### **Use and Disclosure**

We use third party mailing/fax/email providers to help us to distribute promotional, marketing and advertising materials; third party couriers and freight handlers to help us deliver goods to our customers; and third party share registry providers to help us maintain our share registry and deal with shareholder communications.

We collect personal information, including credit information and credit eligibility information, so we are able:

- to identify our customers and potential customers, and their authorised representatives;
- to inform our customers and potential customers, and their authorised representatives, of marketing initiatives and product offerings we think may be of interest to them;
- to provide goods, services or other benefits to be offered to customers, or for purposes necessary or incidental to the provision of goods, services or other benefits to you;
- to conduct our business and manage our staff and other resources in a professional and efficient manner;
- to develop and implement initiatives to improve our products and services;
- to identify individuals and protect unauthorised access to their personal information;
- to provide information to individuals, or administer accounts or services in our control;
- to improve our services to you or others;
- to derive or aggregate anonymous information from which individuals cannot be identified;
- to register security interests on the Personal Properties Security Register;
- to assess your request for deferred payment terms, or interact with you as guarantor;
- to conduct credit checks via third party credit reporting bodies; and



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- to carry out billing and debt recovery activities.

Except for the primary purposes for collection set out above, and secondary purposes as permitted under each Privacy Act, we will not disclose personal information to a third party unless:

- the individual concerned has consented to the disclosure;
- the third party is our service provider, agent or contractor, in which case we will require them to disclose and to use the personal information only for the purpose for which it was disclosed;
- the third party is a person involved in a dealing or proposed dealing (including a sale) of all or part of the assets and business;
- there are reasonable grounds to believe that disclosure is necessary to prevent or lessen a threat to your life or health or that of another person;
- the third party is a credit reporting agency, creditor, banker, financier, credit provider or insurer;
- the disclosure is to a related body corporate of SNL or a potential purchaser of a business;
- the disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim; or
- the disclosure is permitted, required or authorised by or under law.

### Our Website

To ensure we are meeting the needs and wants of Website users, and to develop our online services, we may collect aggregated information by using cookies.

Cookies are unique identification numbers like tags that are placed on the browser of Website users. The cookies do not in themselves identify users personally, but are linked back to a database record about them.

We may use cookies to track use of our web site, and to compile statistics on visits to the site in an aggregated form and log anonymous information such as:

- the address of a user's server;
- a user's top level domain (such as .com. or .au);
- the date and time of a user's visit;
- the pages a user accessed and downloaded;
- the search engine a user used;
- what type of browser was used.

When a user visits our site a cookie may be placed on their machine. Where a user has visited us before the cookie may be read each time they re-visit the site.

We do not use this technology to access any other personal information of a user in our records and a user cannot be personally identified from a cookie.

If a user chooses not to have their browser accept cookies from our site, they will still be able to view the text on their screens.

### Marketing

We may use personal information to advise the individual concerned of new services and marketing initiatives that we think may be of interest to them. This may include special product offerings, sale brochures, catalogues and general information about SNL.



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Those who prefer not to receive information about our products or services can contact our Privacy Officer to be removed from the relevant circulation list. Contact details for our Privacy Officer appear at the end of this policy.

We never disclose personal information to a party outside the SNL group for the purposes of allowing them to direct market their products or service on an individual, unless that individual has expressly consented to that kind of disclosure.

We may require written confirmation of a request to be removed from our circulation list.

### **Quality and Correction of Records**

We ask that you tell us of any changes to the personal information we hold about you. We can be notified at any time to update personal information or to be told that the personal information we hold about you is inaccurate or incomplete. We will then take reasonable steps to correct the information in the manner requested. If the New Zealand Act applies to your personal information we will advise you that the correction has been made.

### **Security**

The protection of personal information is a priority for SNL.

We are committed to taking reasonable steps to protect personal information about you which we store including maintaining:

- safeguards to protect personal information against unauthorised use, disclosure, access, alteration, destruction and accidental loss. All personal information we hold is dealt with in accordance with the APPs or IPPs (as the case may be);
- industry standards for the security and protection of information. Personal information is stored securely and access is restricted to authorised personnel only. Our computer systems require access passwords, and these are kept secure by our personnel; and
- internal policies on management of personal information, and staff training to ensure compliance with these policies. All our staff are required to read this policy and understand their responsibilities in relation to personal information.

### **Access to Personal Information**

We will generally allow an individual access to any personal information that we hold about them on request - subject to any Restrictions on Access set out below. We will try to give the individual concerned access in a form and manner that suits their needs.

Contact our Privacy Officer if you wish to request access to your personal information in our records. Contact details for our Privacy Officer appear at the end of this policy.

### **Restrictions on Access**

You may not be allowed access to personal information we hold where access would reveal evaluative information generated by us in connection with a commercially sensitive decision-making process. Instead, we may give you an explanation for the decision, rather than direct access to the information.

If we have given you such an explanation and you believe that direct access to the evaluative



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information is necessary to provide a reasonable explanation of the reasons for the decision, we will, at your request, review the decision. Personnel other than the original decision-maker will conduct the review.

Wherever direct access by you is impractical or inappropriate, we should consider together whether the use of a mutually agreed intermediary would allow sufficient access to meet both our needs and concerns.

Other instances where it may not be appropriate to provide you with access to the personal information we hold, include where:

- providing access would pose a serious and imminent threat to the life or health of any individual;
- providing access would have an unreasonable impact upon the privacy of others;
- the request for access is frivolous or vexatious;
- the information relates to an anticipated or existing legal dispute and disclosure would compromise our position or the position of others.

We will provide you with written reasons in the event we refuse your request for access to personal information.

### **Charges for Access**

An individual will incur no charges for lodging a request to access personal information. However, we may levy a reasonable charge for providing the access. We will provide an estimate of any charge on request, or if it appears to us that the work will be onerous or otherwise warrants a charge.

### **Overseas Transfer and Data Storage**

SNL is not likely to disclose your personal information to overseas recipients.

SNL stores personal information obtained in New Zealand within New Zealand at our branch premises at Wellington, and outside New Zealand at our corporate headquarters at Guildford, NSW, Australia.

### **Changes to This Policy**

We may update or change this policy when and as we consider appropriate. When we do so, we will publish the current policy on our web site which can be accessed at <http://www.multispares.com.au/> and <http://www.multispares.co.nz/>.

If you have any suggestions or concerns that are not addressed in this privacy policy, please contact our Privacy Officer. Contact details for our Privacy Officer appear at the end of this policy.

### **Complaint Resolution**

We are committed to constantly improving our procedures so that personal information is treated appropriately. If you feel that we have failed to deal with your personal information in accordance with the APPs, the IPPs or this policy, please speak to us so that we have an opportunity to resolve the issue to your satisfaction. The person to contact is our Privacy Officer, whose contact details appear at the end of this policy.



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Our Privacy Officer will manage the following process for us to:

- listen to your concerns and grievances regarding our handling of personal information;
- discuss with you the ways in which we can remedy the situation; and
- put in place an action plan to resolve your complaint and improve our information handling procedures if appropriate.

If this process does not result in an outcome that is satisfactory to you, you may contact the Office of the Australian Information Commissioner (where the Australian Act applies to your personal information) and the New Zealand Privacy Commissioner's Office (where the New Zealand Act applies to your personal information). Where appropriate, we will work together with the relevant Privacy Commissioner's Office to resolve the issues between us. Further information about privacy, your rights in Australia, and contact details for the Australian Information Commissioner can be obtained at the Australian Information Commissioner's website at <http://www.oaic.gov.au/>. Further information about privacy, your rights in New Zealand, and contact details for the New Zealand Privacy Commissioner can be obtained at the New Zealand Privacy Commissioner's website at [www.privacy.org.nz](http://www.privacy.org.nz).

### Contact Information

If you wish to access any personal information that we hold about you, have a query about this policy, or would like to meet with our Privacy Officer to pursue any question, comment or concern, please contact our Privacy Officer as follows:

**Email:** [privacy@supplynetwork.com.au](mailto:privacy@supplynetwork.com.au)

**Telephone:** +61 2 8624 8077

**Mail:** Privacy Officer  
Supply Network Limited  
PO Box 3405  
Wetherill Park NSW 2164