



# GRAYMONT

## Australian Privacy Policy

A.C.N. 630 698 716 Pty Ltd (ACN 630 698 716) its subsidiary companies and related bodies corporate incorporated in Australia (together, **we, us** and **our**) are committed to protecting the privacy of your personal information. This privacy policy explains how we collect, use, disclose and hold personal information and how to contact us if you have any queries about our management of your personal information.

### What is personal information?

"Personal information" is information or an opinion, in any form and whether true or not, about an identified individual or an individual who is reasonably identifiable. Examples include an individual's name, address, contact number and email address.

### The kinds of personal information we collect and hold

The kinds of personal information we collect and hold about you depends on the nature of your dealings with us and the circumstances of collection, including whether we collect the information from you as a customer, supplier, contractor, job applicant or in some other capacity.

For example:

- if you are a customer, we collect your name and contact details, your order and payment details and, in many cases, your delivery address;
- if you register an account on our customer portal, we collect your name and contact details, as well as the names and contact details of any persons you nominate as authorised users of the account;
- if you make a product enquiry, we collect your name, contact details and location; and
- if you are a job applicant, we collect your name, contact details, qualifications, employment history, references and any other information you choose to provide to us in support of your application.

If you deal with us in some other capacity, we may collect your name and contact details and any other information you choose to provide to us.

We may also collect details of the interactions you have with us.

We do not generally collect sensitive information (such as health information), and we will only collect sensitive information about you with your consent (unless we are otherwise required or authorised by or under law to do so).

If you provide us with personal information about another person (for example, if you nominate another person as an authorised user of an account on our customer portal), please make sure that you tell them about this privacy policy.



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If you are or become an employee of our Australian business, the handling of your personal information may be exempt from the Australian Privacy Principles if it is directly related to your current or former employment relationship with us.

## **How we collect personal information**

We collect personal information in a variety of ways, including:

- from you directly (such as when you interact with us in writing, electronically or by telephone);
- when you communicate with us through our website;
- through your use of the portals we host on our website; and
- from third parties such as business partners.

## **The purposes for which we collect, hold, use and disclose personal information**

We collect, hold, use and disclose personal information for a range of purposes, including:

- to supply our products and services;
- to process your orders and communicate with you about those orders;
- to respond to your enquiries about our products and services;
- to administer our customer portal;
- to process payments made to us;
- for our administrative purposes and internal record keeping;
- to provide you with customer service or technical support, and deal with any complaints or feedback you have;
- to perform research and analysis, and develop our products or services;
- to manage our relationships with our customer, suppliers and contractors; and
- to consider job applicants for current and future employment.

We may use and disclose your information for other purposes required or authorised by or under law (including purposes for which you have provided your consent).

If we are unable to collect personal information from or about you, we may not be able to respond to your requests or enquiries or engage in certain other dealings with you.



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## **Direct marketing**

We may use your personal information so we can contact you with information about our products and services, special offers, promotions and events that may be of interest to you.

We may contact you by email, mail or telephone. You can let us know at any time if you no longer wish to receive these communications, by contacting us (using the contact details at the end of this policy) or using the opt-out/unsubscribe facility in our communications. Your consent will be deemed if you do not opt out when we offer you the opportunity to do so, and will remain current until you advise us otherwise.

## **Disclosure of personal information to third parties**

In conducting our business, we may disclose your personal information to third parties for the purposes outlined above. These third parties include, where appropriate:

- our related companies (including Graymont Limited and other companies in the Graymont group of companies);
- financial institutions for payment processing;
- our contracted service providers, including:
  - delivery and shipping providers;
  - information technology service providers;
  - marketing, promotional and market research agencies; and
  - external business advisors (such as auditors and lawyers);
- in the case of a sale of our business (in whole or part), to the purchaser (as an asset of the business); and
- if you are a job applicant, referees whose details you have provided to us.

We may also disclose your personal information to other third parties and for other purposes where we are required or authorised by or under law to do so (including where you have provided your consent).

## **Disclosure of personal information to overseas recipients**

Some of our service providers and companies in the Graymont group are located in different countries. As a result, personal information collected and held by us may be transferred to recipients in other countries.

In particular, there are companies in the Graymont group located in Australia, Canada, the United States of America, New Zealand, Malaysia, the Philippines and Indonesia. Our service providers are located in a range of countries, including in Australia, Canada, the United States of America, New Zealand, Malaysia, the Philippines and Indonesia.



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## **How we hold personal information, and quality and security of personal information**

We generally hold personal information in computer systems, including computer systems operated for us by our service providers. We take reasonable steps to protect the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. This includes taking appropriate security measures to protect electronic materials, and requiring our service providers to do so.

We take reasonable steps to ensure the personal information we collect, use and disclose is accurate, complete, up to date and relevant. You can help us by letting us know (using the contact details at the end of this policy) about any changes to your personal information, such as your address and phone number.

## **Access to and correction of your personal information**

Please contact us (using the contact details at the end of this policy) if you would like to access or correct the personal information we hold about you. We will generally provide you with access to your personal information (subject to some exceptions permitted by law), but may charge an access fee to cover the cost of retrieving the information and supplying it to you.

## **Our website ([www.graymont.com](http://www.graymont.com))**

### ***Collection of information other than personal information***

Some of the information collected about your visit to our website is not personal information, because it does not reveal your identity. For example, we may record your IP address, the date and time of your visit, the pages you viewed, the page you came from to get to our site, any documents you downloaded and the type of browser and operating system you used.

If collected, this information will be used and disclosed by us in anonymous form, for example, in an aggregated way for purposes including statistical analysis and web site development. You are not individually identified, however we reserve the right to use or disclose this information to try to locate an individual where we reasonably believe the individual may have engaged in any unlawful or inappropriate activity in connection with our website, or where we are otherwise required or authorised by law to do so.

### ***Cookies***

We use data collection devices such as "cookies" on certain web pages to help analyse our web page flow and measure promotional effectiveness. Cookies are pieces of information a website sends to an individual's device while they are viewing the website. Cookies allow the website to remember important information that will make your visit to the site more useful. We use cookies to help improve your future visits.

We use Google Analytics to gather statistics about how our website is accessed. Google Analytics uses cookies to gather information for the purpose of providing statistical reporting. The information generated by the cookie about your use of the website will be transmitted and stored by Google on servers which may be located in other countries. No personally identifying information is recorded or provided to Google. You can opt out of the collection of information via Google Analytics by



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downloading the Google Analytics Opt-out browser add on. You can also disable cookies in your internet browser.

If you do not wish to receive a cookie or if you wish to set your browser to warn you each time a cookie is being sent, or if you wish to turn off all cookies, use the options on your browser to assist you. The Help documentation on your browser may assist you in changing your cookie preferences. Please note that by turning cookies off, you will not have access to many features available on our website.

## Complaints

Please contact us (using the contact details at the end of this policy) if you have any concerns or complaints about the manner in which we have collected or handled your personal information. We will inquire into your complaint and respond to you in writing within 30 days. If you are not satisfied with our response, you can contact us to discuss your concerns or lodge a complaint with the appropriate data protection authority. In Australia, complaints can be lodged with the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)).

## Changes to this privacy policy

We may amend this privacy policy from time to time at our discretion. Amended versions will be posted at <http://www.graymont.com/en/legal>.

## Contact details and additional information

If you would like more information about our approach to privacy, or if you wish to contact us regarding the information set out in this privacy policy, please contact us:

- by phone: +61 2 9458 2929
- by email: [privacy@graymont.com](mailto:privacy@graymont.com)
- by post: Level 16, 111 Pacific Highway  
North Sydney, New South Wales 2060  
Australia