

PRIVACY POLICY - ACM PARTS PTY LTD

ACM Parts is an Australian company specialising in the dismantling and supply of motor vehicle parts in Australia.

For the purposes of this Privacy Policy, ACM Parts Pty Ltd ACN 165 321 979 shall be referred to as "ACM Parts", "we" or "our".

ACM Parts collects, holds, uses and discloses your personal information in a number of different ways. We are committed to ensuring that your personal information is protected.

OUR PRIVACY POLICY

Our Privacy Policy provides you with general information about how ACM Parts manages your personal information. When you acquire a product or service from us you will receive further information about our privacy practices in a privacy statement or other form of privacy disclosure ("Privacy Statement"). The Privacy Statement will give you specific information about how we will manage your personal information. Depending on how you interact with us, a Privacy Statement will be delivered to you in a number of ways, including hard copy/paper or electronic copies.

THE TYPE OF PERSONAL INFORMATION WE COLLECT AND HOLD

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable. It includes sensitive information. We will ask for personal information which is necessary for our functions or activities.

We will generally ask for the following types of personal information:

- name, address and contact details;
- date of birth;
- name of legal guardian for minors (if applicable); and/or
- information about your use of our product or service.
- any other personal information which is either required to acquire a product or service or needed during the lifecycle of that product or service.

If we are not able to collect personal information about you we may not be able to provide you with the products, services or assistance you require. The collection, use or disclosure of your personal information is needed to provide these.

Ways we collect your personal information

We collect your personal information:

- by using written forms;
- through contact over the telephone, your mobile or other messaging technology;
- via the internet, including websites; and/or
- in person to person contact (e.g.: when visiting one our offices or other locations).

We will collect your personal information during the information life cycle, on an adhoc or a recurrent basis using the above methods. For example, we will collect personal information when you acquire a product or service from us or when you need to complain. We will combine or link personal information we already know about you to other personal information we collect about you.

We collect your personal information:

- directly from you;
- from your motor vehicle repairer;
- publicly available sources of information; and/or
- from other persons or organisations (including related and third parties).

Please refer to "Parties to whom we disclose and collect your personal information" section which details the types of organisations we disclose your personal information to and collect your personal information from.

COOKIES

Our websites rely on "cookies" to provide a number of services to you. A cookie is a piece of data that a website sends to your browser and which is then stored on your computer or other internet enabled device. Cookies are generally one of two types, a session cookie or a persistent cookie. A session cookie is a temporary cookie that is placed on the device and remains until you leave one of our websites. A persistent cookie will remain on your device for a period of time or duration specified in the cookie despite you leaving our websites.

Cookies generally allow our websites you are browsing to interact more efficiently with your device. ACM Parts uses cookies to collect and use information for a range of purposes, including; to maintain and improve the operation of our websites; track user preferences and product requirements to customise our websites and target and improve advertising or marketing relevance. We may also have an arrangement with third parties who may use our cookies to improve the relevance of our advertising to you on third party websites. You are able to use your browser settings to manage cookies. These settings may include deleting all or some cookies, not accepting any cookies or being notified when cookies are being used. Sometimes if you decide not to allow or accept a cookie, it may affect your use or the functionality of our websites.

LINKS TO OTHER WEBSITES

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the Privacy Policy applicable to the website in question.

PURPOSES OF COLLECTION OF PERSONAL INFORMATION

We collect your personal information so we can:

- identify you and conduct appropriate checks;
- understand your requirements and provide you with a motor vehicle part or service;
- set up, administer and manage our products and services;
- assess and investigate any warranty claim concerning one or more of our products or services;
- manage, train and develop our employees and representatives;
- manage feedback, complaints and disputes, and report any dispute to your motor vehicle repairer or dispute resolution body;
- get a better understanding of you, your needs, your behaviours and how you interact with us, so we can engage in product and service research, development and business strategy

including managing the delivery of our services and products via the ways we communicate with you.

If you have contacted us with regards to careers and apprenticeships opportunities, we collect personal information so that we can:

- identify you and conduct appropriate checks;
- assess whether you may be suitable for a role with our company; and
- contact you to arrange a job interview or advise that your application has been unsuccessful.

USE AND DISCLOSURE

We use and disclose your personal information for the purposes we collected it. Please refer to "Purposes of collection of personal information" section to understand what these purposes may be.

We will use and disclose your personal information for a secondary purpose related to a purpose for which we collected it, where you would reasonably expect us to use or disclose your personal information for that secondary purpose. In the case of sensitive information, any secondary use or disclosure will be directly related to the purpose of collection.

For example, we will disclose your personal information to third party service providers so that they can provide the contracted services to ACM Parts such as where we appoint an agent to manage the distribution of motor vehicle parts on our behalf, information technology support or programming, hosting services, telephony services, mailing or sending of documentation to customers digitally or otherwise.

There will be other instances when we may use and disclose your personal information in accordance with the Australian privacy regimes including where:

- you have expressly or impliedly consented to the use or disclosure;
- we reasonably believe that the use or disclosure is reasonably necessary for an enforcement activity conducted by or on behalf of an enforcement body; or
- we are required or authorised by law to disclose your personal information, for example, to a court in response to a subpoena or to the Australian Taxation Office, Centrelink, Australian Transaction Reports and Analysis Centre (AUSTRAC).

Parties to whom we disclose and collect your personal information

As detailed in "Ways we collect your personal information" section there are a range of people and organisations ('parties') to whom we disclose your personal information and collect personal information from – that are not you.

Some examples of the parties to whom we may disclose your personal information to and collect personal information from are:

- a related company;
- your motor vehicle repairer;
- customer, product, business or strategic research and development organisations;
- data warehouse, strategic learning organisations, data partners, analytic consultants;
- a third party with whom we have contracted to provide services in connection with the supply of motor vehicle parts, for example:

- information technology providers,
- administration or business management services, consultancy firms, auditors and business management consultants;
- marketing agencies and other marketing service providers,
- print/mail/digital service providers, and
- imaging and document management services;
- accounting or finance professionals and advisers;
- government, statutory or regulatory bodies and enforcement bodies;
- any dispute resolution body;
- debt collection agency;
- legal and any other professional advisers or consultants;
- any other organisation or person where you have asked them to provide your personal information to us or asked us to obtain personal information from them.

OVERSEAS DISCLOSURE

We will send your personal information overseas and collect personal information from overseas. Instances when we will do this include:

- when you have asked us to do so or we have your consent;
 - when we are authorised or required by an Australian law or a court/tribunal to do so;
 - when we have outsourced a business activity or function to an overseas service provider;
- and
- certain electronic transactions.

We will disclose all kinds of personal information overseas but only to the extent it is necessary to perform our functions or activities. In order to engage in our business activities and functions we will disclose your personal information to and collect your personal information from parties in a number of countries including New Zealand and the USA. We will need to from time to time disclose your personal information to and collect your personal information from other countries not on this list. This will be on an adhoc or case by case basis and for the purposes for which we collected your personal information.

SECURITY OF YOUR PERSONAL INFORMATION

We hold your personal information in:

- computer systems;
- electronic databases;
- digital records; and
- in hard copy or paper files.

These storage mechanisms may be managed in a number of ways. They may be managed or administered internally by us and may be held locally in Australia. Or they could be managed by a third party storage provider with whom ACM Parts has a contractual relationship and be either managed locally and/or overseas.

We will take all reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. The ways we do this include:

- limiting physical access to our premises;
- restricting electronic and physical access to personal information we hold;
- having in place stand-by systems and information backups to deal with major business interruptions;
- maintaining technology security products;
- requiring any third party providers to have acceptable security measures to keep your personal information secure; and
- destroying or de-identifying personal information pursuant to the law and our record retention policies.

We maintain industry standard technology and procedures in respect of our information management and provision of online services. ACM Parts has an ongoing program of review and enhancement of its security measures. The reviews and updates address such matters as security and information management policies, processes and procedures, and technology reviews such as software, virus protection and fire wall settings.

E-mail transmissions to ACM Parts are not necessarily secure. If you have any concern about the security of the contents of your e-mail or any other transaction over the Internet then you should consider contacting us by other means. ACM Parts does however employ strong encryption techniques and the use of firewalls. If you make a transaction involving the submission of personal information over the Internet to ACM Parts using one of our online forms then ACM Parts employs that encryption technology. Once ACM Parts has received your personal information, it is stored and protected by a range of security controls, including firewalls, user identification requirements and audit trails.

ACM Parts trains its employees and representatives in their privacy obligations, applies confidentiality obligations and provides authorised persons with user identifiers, passwords or other access codes to control access to your personal information.

NON-CUSTOMERS

You may not be a customer of ours but you may interact with us, including by using our website. We will collect, use and disclose your personal information in accordance with this Privacy Policy and any Privacy Statement you may receive when you interact with us.

ANONYMITY AND PSEUDONYMITY

You have the option of not identifying yourself or of using a pseudonym unless we are required or authorised under Australian law or a court/tribunal to identify you or it is impracticable to deal with you anonymously or by a pseudonym.

ACCESS AND CORRECTION OF PERSONAL INFORMATION

You have the right to request access to personal information we hold about you. We are able to deny access to some or all of your personal information in specified circumstances. We will provide reasons for any refusal in writing.

If you would like to request access to the personal information we hold about you please contact us by using the contact details specified below, and we will commence the privacy access request process for you which may require you to complete a privacy access request form. These requests may incur a fee and you will be advised of an estimated fee and the payment options at the time of written acknowledgement. This is usually provided to you within 5 business days.

Our response to your request will usually be completed within 30 days of receipt of the request. If we require further time we will contact you in writing to advise of this and provide our reasons for the further time that is required.

We rely on the accuracy of the personal information we hold about you to provide our products and services to you. You have the right to request us to correct any inaccurate, out-of-date, incomplete, irrelevant or misleading personal information. We will take such steps that are reasonable in the circumstances with regard to the purpose for which your personal information is held to make a correction. We may refuse to correct your personal information and will provide reasons for refusal in writing. If we refuse to correct your personal information you have the right to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take such steps that are reasonable in the circumstances to associate that statement with all records containing the relevant information.

COMPLAINTS HANDLING

If you have a complaint about how we collect, hold, use or disclose your personal information or a privacy related issue such as refusal to provide access or correction, please use our complaints process so that we can help. It is important to follow the complaint handling process in order to resolve your complaint effectively and efficiently.

Please note how we will deal with a complaint:

Step 1. Let us know

If you would like to make a complaint, please let us know by contacting the staff member with whom you dealt, as they may be able to resolve the complaint for you. If not, the staff member will refer you to a Manager or their delegate and they will attempt to resolve the complaint. A response is usually provided to you within 5 business days.

Step 2. Seek review by an external service

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you may be able to access the services of an External Dispute Resolution Scheme.

Australia Office of the Australian Information Commissioner (OAIC)

Complaints must be made in writing

1300 363 992

Director of Compliance - Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

www.oaic.gov.au

CHANGES AND GETTING A COPY OF THE POLICY

We encourage you to review and check our websites regularly for any updates to this Privacy Policy. We will publish the updated version on this website and by continuing to deal with us, you accept this Privacy Policy as it applies from time to time. If you would like a copy of this Privacy Policy, please contact us.

CONTACT US

For more information about our privacy practices, or if you believe that any information we are holding on you is incorrect or incomplete, or to make a complaint, please use the following contact details:

Address:

ACM Parts Pty Ltd

GPO box 4775 Melbourne 3001

Website: www.acmparts.com.au