

PRIVACY POLICY

Würth Australia Pty Ltd (ABN/ACN 48 002 487 096) (referred to as "Würth Australia", "we" and "us") recognises that the privacy of your personal information is important to you and we are committed to protecting the privacy of any personal information we collect from you. Unless you give us your consent to do otherwise, we will only collect, use, store and disclose your personal information in accordance with this Privacy Policy.

We abide by the Australian Privacy Principles ("**APPs**") under the *Privacy Act 1988* (Cth) ("**Privacy Act**"). This Privacy Policy outlines how we will handle and manage your personal information. You can obtain information about the APPs and your privacy rights at the website of the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/privacy-law/>. Our Credit Information Policy (available [here](#)) will apply where we manage your credit information and/or credit eligibility information (for example, when offering credit services). That policy is our credit reporting policy for the purposes of Part IIIA of the Privacy Act.

Observing and protecting the confidentiality of your personal information is an essential aspect of the conduct of our business. We generally disclose such information only in accordance with our Privacy Policy.

What information do we collect?

We primarily collect personal information that is necessary for us to provide our products and services to you or if you are providing us with a service. Personal information is any information that can be used to identify you and may include:

- your name, address and contact details (including telephone numbers and email address);
- your work contact details including name, telephone numbers, work address and email address if you are our customer or supplier;
- information about your dealings with us about our products and/or services;
- images captured by Closed Circuit Television (CCTV) systems used by us for 24 hour video surveillance;
- other personal information you may disclose to us when you contact us with a query or complaint, or where you request a product or service from us, or information about a product or service from us, or which is contained in any other communications between you and us.

Where relevant we may ask you for other information, for example, if you apply for employment with us we may collect information about your qualifications and employment history. Some of this information is considered by law to be "sensitive information" about you. This includes any information that tells us about your health and/or medical condition. More specific information regarding the collection of personal information from job applicants is set out in our [Job Applicants – Privacy Collection Notice](#).

How do we collect and hold your personal information?

We usually collect personal information in the following ways:

- directly from you, either in person, in documents, by email, telephone or via our website (including our E-Shop and isi! platform) or via the Würth Australia mobile phone application ("**App**") when you, for example:
 - purchase products or services from us;
 - enquire about our products or services generally;
 - apply to work with us;
 - participate in our promotions, monthly specials or competitions;
 - participate in customer satisfaction surveys or focus groups on proposed products;
 - use our website, App or other applications including our contractor management systems; or
 - visit one of our offices or pick-up shops.
- from third parties who, for example, forward your details to us;

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- from CCTV systems used by us for 24 hour surveillance, which monitor and record activities at all our premises Australia-wide, including in our offices, administration areas, warehouses, shop counters and Training Academy;
- from publicly available resources.

We hold personal information in hard copy and electronic files. If your personal information is no longer needed, we will take reasonable steps to destroy or permanently de-identify it.

Collection of information from our website and our App

When using our website or our App you may voluntarily disclose personal information to us. Our server may automatically record details such as your internet address, domain name if applicable, and the date and time of your visit to our website or our App. If you access our website (or any part of it) or our App via a social media plugin (such as Facebook), you consent to us collecting, storing and using the information you make available to us via the plugin. If you have questions about how social media plugins work, you should check the terms of use of the relevant social media service.

We gather this information for internal purposes only, including statistical and marketing purposes.

We will try to not identify users or their browsing activities except as necessary to investigate or report any suspected unlawful activity, as required or authorised by law or as reasonably necessary for the activity of an enforcement body.

Our website and App use cookies, which may collect personal information. Cookies are pieces of data stored on your browser that record information on your use of our website or the App, such as details of your server and your browsing activity, and send the information to the server. We use these cookies to monitor usage of our website and App only. You may be able to change the settings of your browser so that cookies are not accepted generally or that you are provided with options to accept or reject them as they are sent to your browser. You might not be able to use the full functionality of our website or the App by refusing the use of cookies.

In addition to web server logs, we also use third party web analytics, web beacons and similar technologies, such as Google Analytics, Google AdWords Remarketing, Google reCAPTCHA and Facebook Pixel, to collect or receive information in order to improve the performance and usability of our website, App and Facebook page. The provider of Google Analytics, Google AdWords Remarketing, and Google reCAPTCHA is Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA.

Google Analytics use cookies to analyse how you view and use our App and our website, for example, which pages you visit and how long you are on the site. Information collected by the cookies (including your IP address) is transferred to and stored on Google's servers (at the time of writing, in the United States, however caching and other technologies may mean that your activity data is stored in other locations). Google does not identify or associate your IP address with any other data held by Google. Facebook Pixel identifies users by their user profile. Likewise, Facebook's servers are located in the United States.

Our site may also use Google AdWords Remarketing which will display advertisements to you based on what parts of our sites you have viewed by placing a cookie on your web browser. This cookie does not in any way identify you or give access to your computer or mobile device. Google AdWords Remarketing allows us to tailor our marketing to better suit your needs and only display advertisements that are relevant to you.

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We use Google reCAPTCHA on our website and the App. reCAPTCHA is used to check whether the data entered on our website (such as on a contact form) or App have been entered by a human or by an automated program. To do this, reCAPTCHA analyses the behaviour of the website or App visitor based on various characteristics. This analysis starts automatically as soon as you enter our website or our App. For the analysis, reCAPTCHA evaluates various information (e.g. IP address, how long you have been on the website or App, or mouse movements made by the user). The data collected during the analysis will be forwarded to Google. reCAPTCHA analysis take place entirely in the background. Visitors are not advised that such an analysis is taking place. Further information about Google reCAPTCHA can be found [here](#).

By using our website or the App, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy (available [here](#)) and for the purposes set out above. You can opt out of Google Analytics ([here](#)) or AdWords Remarketing ([here](#)). If you disable or refuse the cookie or use the opt-out service provided by Google you may not be able to access all the features on our website or the App to their full extent. Please note that it is not possible to disable Google reCAPTCHA so you should not continue to visit our website or use the App if you do not consent to the processing of data about you by Google in the manner described in Google's Privacy Policy.

By using our Facebook page, you consent to the processing of data about you by Facebook (Facebook Inc., Hacker Way, Menlo Park, California 94025) in the manner described in Facebook's Data Policy (available [here](#)) and for the purposes set out above. You can hide our advertisements on your Facebook page by following the instructions [here](#).

We use Stripe on our E-Shop to process online payments by customers. Stripe collects "Transaction Data" which includes personal information, and may include the following: your name, email address, billing address, shipping address, payment method information (such as credit or debit card number, bank account information or payment card image selected by you), merchant and location, purchase amount, date of purchase, and in some cases, some information about what you have purchased and your phone number and past purchases. Stripe will only use payment account details to (a) secure, provide, provide access to and update the Stripe services; (b) fulfil its obligations under law, and comply with financial partner and governmental authority requirements and requests; and (c) prevent and mitigate fraud, financial loss and other harm. By purchasing goods via the E-Shop you consent to the processing of data about you by Stripe Inc. (354 Oyster Point Blvd South San Francisco, California 94080 United States) in the manner described in Stripe's Privacy Policy (available [here](#)) and for the purposes set out above.

Collection of Personal Information from our Contractor Management System

By using our contractor management system, you consent to the processing of data about you by the contractor management system provider in the manner described in its Privacy Policy (available [here](#)) and for the purposes set out above.

Why do we collect personal information and what are the consequences of not providing us with the information requested?

Generally, we collect personal information about you in the course of obtaining goods and services from you, in order to meet our obligations to you, to enable us to provide our products and services to you, to improve your experience with us and/or to enable us to address any enquiry or complaint you may have made. We also collect personal information so you can seek employment with us or communicate with us in writing, by e-mail, telephone or via our website. Our ability to meet our obligations to you, your business or to process any application may be

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adversely affected if you do not give us the requested personal information, or if the information you give us is incomplete or inaccurate.

We collect personal information via our CCTV systems for 24-hour video surveillance to:

- improve actual and perceived levels of safety;
- reduce the likelihood of graffiti, vandalism and anti-social behaviour around our premises;
- reduce incidents of criminal behaviour including fraud against our business and to aid in identifying and prosecuting offenders;
- reduce insurance excesses and premiums;
- assist in minimising and monitoring work health and safety issues and risks; and
- assist in tracking inward and outward movement of goods, particularly large value items.

How do we use your personal information?

We use personal information primarily to provide our products and services to you in the ordinary course of conducting our business and/or to obtain goods and services from you. We may also use personal information to:

- contact you to provide you with the information, materials or products and services you request;
- contact you to provide you with information and materials on our products and services that we think you may be interested in;
- provide you with our products and services;
- provide you with information about the products and services you are currently using;
- provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- provide you with information about promotions, monthly specials, competitions or upcoming events that we think you may be interested in;
- manage our relationship with you, including addressing any enquiries or complaints you may have, and to improve the services we provide;
- analyse and understand our client base, for example, by engaging third parties to conduct research on our behalf; and
- for a secondary purpose that is related to a purpose for which we collected it, where you would reasonably expect us to use your personal information for that secondary purpose;

If we intend to use your personal information for direct marketing, such as by adding you to a marketing database, and you have not already consented to this use, we will notify you and will provide you with an opportunity to opt out.

If you no longer wish to receive our email alerts, you may opt out at any time by replying to the email using the unsubscribe facility.

To whom do we disclose personal information?

We will only disclose personal information for the purpose for which it was collected or in the following circumstances:

- to a member of the Würth Group, which means our subsidiaries, our ultimate holding company and its subsidiaries for consultation and reporting on relevant issues and for storage purposes, depending on where our storage facilities and/or servers are located;
- third parties including business partners, suppliers, sub-contractors and service providers who assist us in the conduct of our business;

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- to market research companies for the purpose of analysing our client base and undertaking research on our behalf;
- to any relevant law enforcement body, courts and legal advisers where unlawful acts are suspected or in order to respond to subpoenas, court orders, or legal process;
- where occupational health and safety complaints have arisen, to workplace Health and Safety Officer(s) or our Insurer(s);
- to third parties in order to investigate, prevent, or take action regarding illegal activities or suspected fraud, to establish or exercise our legal rights or defend against legal claims, or in situations involving potential threats to the physical safety of any person;
- where required or authorised by law or otherwise as permitted under the Privacy Act;
- where you consent or have authorised a third party to the disclosure;
- in the event of a sale, merger, liquidation, dissolution, reorganization or acquisition of Wurth Australia, or a Wurth Australia business or business unit, information we have collected about you may be sold or otherwise transferred. However, this will only happen if the party acquiring the information agrees to be bound by the terms of this Privacy Policy and the notice provided to you when the information was collected.

Cross-border disclosure of personal information

We may deal with third parties that have all or part of their operations located overseas. As a result, your personal information may be disclosed to a recipient in a foreign country, including but not limited to Germany and the United States.

How secure and accurate is your personal information?

We will take reasonable steps to ensure that all personal information we hold is:

- accurate, complete, up-to-date, relevant and not misleading;
- stored in a secure environment; and
- protected from misuse, interference and loss as well as unauthorised access, modification or disclosure.

Any personal information in the form of images captured by CCTV will be stored onsite at our premises and accessible by specifically authorised employees in accordance with controlled access procedures. Images will be stored for a minimum of thirty (30) days.

If any of your details change, please let us know as soon as possible by using the contact details below so we can maintain the accuracy of your personal information.

How can you access and correct your personal information?

We seek to ensure that all personal information collected is accurate and complete. You have a right to access personal information we hold about you. We will comply with any request to access your personal information that you send us by email at privacy@wurth.com.au where the Privacy Act or the APPs allow us to refuse to do so. There is no fee for making a request to access your personal information but we may charge a fee for giving you access to your personal information in a mutually agreed format, usually by sighting the accessible information held on file. You also have the right to ask us to correct information about you that is inaccurate, incomplete, out-of-date, irrelevant or misleading. If we refuse to correct your personal information as requested, we must:

- notify you in writing of the reasons for the refusal (unless it would be unreasonable to do so) and how to complain of the refusal; and
- upon request from you that we associate a statement that the information is inaccurate, incomplete, out-of-date, irrelevant or misleading, take such steps as are reasonable in the circumstances to associate such a statement so that it will be apparent to users of the information.

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Links to other websites

Our website, App and Facebook page may contain links to third party websites. The links are provided for convenience only and we are not responsible for the content or material contained in, or obtained through, any third party website or for the privacy practices of the third party website. We suggest that you review the privacy policy of each website that you visit.

Our links to the linked websites should in no way be construed as an endorsement, approval or recommendation by us of the owners or operators of the linked website or of the content, products or services contained on or referred to by the linked websites.

How can I contact Wurth Australia?

If you have any questions or complaints about how we handle your personal information, you can contact our Privacy Compliance Officer as follows:

Mail: Privacy Compliance Officer
Wurth Australia Pty Ltd
Locked Bag 3000
Dandenong South, VIC 3164

E-mail: privacy@wurth.com.au

Phone: (03) 8788 1193

Attention: Privacy Compliance Officer c/o Human Capital Department

We will consider and respond to any complaint notified to us within a reasonable time, usually within 30 days. We will always endeavour to resolve any complaint to your satisfaction.

Australian Privacy Commissioner

If you are not satisfied with the way in which we handle your enquiry or complaint, you can contact the Office of the Australian Privacy Commissioner on Tel: 1300 363 992 or email: enquiries@oaic.gov.au.

Data breaches

Suspected data breaches will be managed in accordance with our legal obligations as per the Notifiable Data Breaches (NDB) scheme under Part IIIC of the *Privacy Act 1988*. Please contact the Privacy Compliance Officer by telephone or email if you believe that a data breach may have occurred which involves us in some way.

Changes to this Privacy Policy

This is our current Privacy Policy outlining our personal information management practices. This Policy replaces any other privacy policy published by us to date. We may vary this policy from time to time. We encourage you to review our website regularly to ensure that you are aware of our current Privacy Policy.

Wurth Australia reserves the right to modify, revise or supplement parts of this document as it sees fit.