

PRIVACY POLICY

MANAGEMENT OF PERSONAL INFORMATION

At Sealite Pty Ltd (t/as Sealite and Avlite - “we”, “our”, “us), we recognise the importance of your privacy and understand your concerns about the security of the personal information you provide to us. We comply with the Australian Privacy Principles (**APPs**) as contained in the *Privacy Act 1988* (Cth). The APPs detail how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

Personal information is information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

Sensitive information, a sub-set of personal information, is information or an opinion about an individual’s racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information and genetic information.

This policy details how we manage personal information about you.

In the course of doing business, we endeavour to collect business information only. However, the collection of personal information in some instances is necessary or unavoidable.

What personal information we collect and hold

The kinds of personal information we collect from you or about you depend on the transaction you have entered into with us, the goods / services you or your organisation have contracted us to provide, and the goods / services you or your organisation are interested in.

The kinds of personal information that we commonly collect and hold from you or about you include: your name, address, phone, fax and mobile numbers, email address, bank account details and credit card details.

When you browse our website, engage with us on social media, contact us electronically or log in to our web-based portals and apps, we may record geographical tagging, cookies and other statistical data.

Our website, portals and apps use “cookies”. Cookies are text files placed on your computer to help us analyse how you use our online services. Most web browsers automatically accept cookies, but you will normally have the option of declining them. If you choose to decline cookies, you may not be able to experience all of the features of our online offerings. Generally, the information collected using cookies will not be personal information, but may include demographic information such as your postcode, age, gender, preferences and interests. In the event that we do collect personal information through the use of cookies, we will ensure that such information is dealt with in accordance with this Privacy Policy.

How we collect and hold personal information

We aim to collect personal information only directly from you, unless it is unreasonable or impracticable for us to do so. For example, we collect personal information from you or about you from correspondence that you submit to us, telephone calls and meetings with us, information you provide us at trade shows or through our competitions, information you provide us through our paper-based and electronic customer surveys, information you provide us using our web-based portals and apps, and from your activity on our website and social media platforms.

In some instances we may also receive personal information about you from third parties, such as associated businesses and/or federal government departments.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions and activities. For example, we collect, hold, use and disclose your personal information as necessary to provide our goods and services to you or your organisation.

We may collect sensitive information from you or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. In all other situations, we will specifically seek your consent.

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction you have entered into, or provide the goods / services that you or your organisation have contracted us to provide.

We collect, hold, use and disclose your personal information for related purposes that you would reasonably expect, such as our administrative and accounting functions, fraud checks, processing your payments, obtaining product registrations and approvals, providing you with information about other goods / services offered by us, market research, warranty work, customer satisfaction surveys, newsletter communications, statistical collation, and website traffic analysis.

We also use your personal information for marketing and promotional activities, and for maintaining your online subscription/s to our newsletters and service portals. Where we use your personal information for marketing and promotional communications, you can opt out at any time by notifying us. Opt out procedures are also included in our marketing communications.

We may also disclose your personal information to third parties (including product installers, government departments and enforcement bodies) where required or permitted by law.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

How we hold and store personal information

Your personal information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference and loss, and from unauthorised access, modification and disclosure:

- Data held and stored on paper is stored in secure, key-card access premises that are monitored by alarms.
- Data held and stored electronically is protected by internal and external firewalls and access is limited via file password protections.
- Data held and stored “in the cloud” is protected by internal and external firewalls and access is limited via file passwords. We also require our IT contractors and other third parties to implement privacy safeguards.
- Where we disclose personal information to third parties (including contractors and affiliated businesses located locally and overseas), our contractual arrangements with them include specific privacy requirements.
- Our staff receive training on privacy procedures.

Destruction and De-identification

We will retain your personal information whilst it is required for any of our business functions, or for any other lawful purpose. We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed.

Overseas disclosure

Our business works closely with other businesses located overseas, including a network of third party agents and distributors. We routinely disclose your personal information to these third parties to enable them to assist us in carrying out our business functions and activities. However, we will only do so where:

- it is necessary to complete the transaction you have entered into; and
- you have provided consent; or
- we believe on reasonable grounds that the overseas recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- it is otherwise permitted by law.

Our main corporate affiliates are located in the USA and the UK, with country-specific agents and distributors located worldwide.

Requests for access and correction

We have procedures in place for dealing with and responding to requests for access to, and correction of, the personal information held about you.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why. For further information, please contact us privacy@sealite.com.

To assist us to keep our records up-to-date, please notify us privacy@sealite.com of any changes to your personal information.

Complaints and Concerns

We have procedures in place for dealing with complaints and concerns about our practices in relation to the Privacy Act and the APPs. We will respond to your complaint in accordance with the relevant provisions of the APPs. For further information, please contact us privacy@sealite.com.

Contact

Privacy Officer
Sealite Pty Ltd t/as Sealite & Avlite
11 Industrial Drive
SOMERVILLE VIC 3912
Telephone: (03) 5977 6128
Fax: (03) 5977 6124
Email: privacy@sealite.com

Last updated: September 2015.