

Privacy Policy

Kessler Couplings and Engineering Supplies Pty Ltd ACN 111 912 193 ABN 86 916 141 288 (**we, us, our**) is an Australian supplier of pipe couplings and pipe repair clamps. We are bound by the Australia Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**). We understand the importance of, and are committed to, protecting your personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable). This Privacy Policy explains how we manage your personal information, including our obligations and your rights in respect of our dealings with your personal information.

Please take a moment to read our Privacy Policy as it describes what happens to your personal information that we collect, including information collected via our website accessible at www.kces.com.au and pipecouplingsandclamps.com.au (the **Website**).

1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- (a) when you contact us, make an inquiry or place an order through our Website, via telephone or by facsimile;
- (b) from correspondence (whether in writing or electronically), including emails;
- (c) through any mobile applications provided by our organisation;
- (d) in administering and performing any contracts with service providers;
- (e) while conducting customer satisfaction and market research surveys;
- (f) when administering any of our services; and
- (g) as otherwise required to manage our business.

In certain cases we may collect personal information from publically available sources and third parties, such as suppliers, recruitment agencies, government agencies (such as company records), contractors, our clients and business partners. We may also collect information from other businesses you provide as referees, with your consent, if you wish to establish a trade account with us. In other cases where we collect personal information about you from a third party, where appropriate, we will request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

2. Types of personal information we collect

The type of personal information we may collect can include (but is not limited to), your name, postal address, email address, phone numbers and, if applicable, employment information.

Payments are processed through third-party banking facilities and we do not store full credit card details. Where you provide credit card details to us over the phone, we will only use this information for the purposes of entering the details in the banking system and will only retain the information contained on the banking confirmation (typically, the card type, last 4 digits of the card number, and the expiry date).

Where you do not wish to provide us with your personal information and payment details when requested, we may not be able to provide you with requested goods or services.

3. Our purposes for handling your personal information

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use and disclose personal information to:

- (a) offer and provide you with our goods and services;
- (b) process orders and sales;
- (c) manage and administer those goods and services, including account keeping procedures;
- (d) communicate with you, including (but not limited to) sending you tax invoices, dispatch and tracking information, returns and exchange authorisations;
- (e) comply with our legal and regulatory obligations; and
- (f) otherwise to manage our business.

We will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure.

We may disclose personal information between our organisations or to third parties such as our suppliers, organisations that provide us with technical and support services, or our professional advisors, where permitted by the Privacy Act. If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

4. Protection of personal information

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third-party servers, which may be located overseas.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information to do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

We will not be liable for any storage, use or disclosure of your personal information beyond our reasonable control and take no responsibility for the privacy and security of information collected via any third-party website you may reach by following a link on our Website.

5. Direct marketing

Like most businesses, marketing is important to our continued success. We believe we have a unique range of products and services that we provide to customers at a high standard. We therefore like to stay in touch with customers and let them know about new opportunities. We may provide you with information about new products, services and promotions either from us, or from third parties which may be of interest to you.

By contacting us by any means (including but not limited to telephone, e-mail, facsimile, SMS, or via the Website), you consent to receive commercial electronic messages from us in relation to the goods and services we offer. Such consent will continue for an indefinite period until you request to opt out. You agree that all communications that we provide to you in writing electronically satisfy any legal requirement that such communications be in writing.

We will not disclose your personal information to third parties for marketing purposes without your consent.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer.

6. Cookies

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

7. Accessing and correcting your personal information

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information we hold about you.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

8. Overseas transfers of personal information

We may disclose your personal information to, or allow personal information to be stored on our behalf by, service providers located outside Australia, including:

- (a) third-party email newsletter service providers;
- (b) payment service providers such as PayPal; and
- (c) in cloud-based software we use for accounting and stock recording purposes.

As at the date of this Privacy Policy, we are not likely to disclose personal information to other overseas recipients, unless you direct us to do so, for example, by requesting an order or invoice to be sent to a foreign address.

If in future we do propose to disclose personal information overseas, we will do so in compliance with the requirements of the Privacy Act and we will, where practicable, advise you of the countries in which any overseas recipients are likely to be located.

By providing your personal information to us, you consent to us disclosing your personal information to any such overseas recipients for purposes necessary or useful in the course of operating our business, and agree that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the Australian Privacy Principles, that entity will not be bound by, and you will not be able seek redress under, the Privacy Act.

If you do not want us to disclose your information to overseas recipients, please let us know.

9. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Privacy Officer:

Post: The Privacy Officer
KCES
PO Box 448
Montrose VIC 3765

Telephone: +61 3 9728 3973

Facsimile: +61 (03) 9728 2973

Email: privacy@kces.com.au

We take all complaints seriously, and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Post: Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

10. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.

The last update to this document was 29 June 2016.