

PRIVACY AND CREDIT PROVIDER POLICY

1 PURPOSE

- 1.1 The Reece Group is committed to protecting your personal information and ensuring that it complies with its obligations under the Privacy Act.
- 1.2 Members of the Reece Group including Reece Australia Pty Ltd (ACN 004 097 090), Viadux Pty Ltd (ACN 087 415 745), Actrol Parts Pty Ltd (ACN 142 654 564), A.C. Components Pty Ltd (ACN 134 588 935), Reece Project Supply Pty Ltd t/as PowerUp Learning (ACN 100 065 307) RTO code 45584 and the Reece Group Foundation Ltd (ABN 89 635 658 276) of 57 Balmain St, Cremorne, Victoria, Australia will on occasions collect information from individuals.
- 1.3 The information that is collected will be held by members of the Reece Group.
- 1.4 The privacy of your information is afforded the highest level of importance by the Reece Group.
- 1.5 We are bound by the Australian Privacy Act 1988 (Cth) (the **Act**), which contains the Australian Privacy Principles (**APPs**) (the Privacy Laws), regarding the manner in which we handle your information and how we respond to your requests to access and correct it. This document sets out our information handling procedures and the rights and obligations that both you and we have in relation to your information.

2 WHO DOES THIS POLICY APPLY TO?

- 2.1 This Policy applies to all dealings the Reece Group has with individuals, including customers, guarantors or prospective guarantors, suppliers and other third party service providers of the Reece Group.
- 2.2 This Policy does not form part of any Personnel's contract of employment.
- 2.3 When we request your information, you have the right to refuse to provide us with information. However, if you decide to do so, we may be unable to process your transaction, provide a personalised service to you, inform you of other products and services that may be of interest to you, or deliver your products or services to you.

3 COLLECTION OF YOUR INFORMATION

- 3.1 We may collect information from;
 - (a) publicly available resources;
 - (b) any person authorised or nominated to act on your behalf or to provide your information;
 - (c) credit reporting bodies and credit providers; and
 - (d) any persons sharing information with us for loss prevention and/or law enforcement purposes.

4 KIND OF INFORMATION THAT WE HOLD ABOUT YOU

- 4.1 The kind of information that we hold about you includes:
 - (a) your name, gender, date of birth, age and contact details;
 - (b) your personal and business address, phone number and email address;
 - (c) your signature and driver's licence number;
 - (d) information from you personally or from any person authorised to act on your

behalf or authorised to provide your information to the Reece Group;

- (e) purchases and payment details;
- (f) customer account numbers;
- (g) correspondence and billing documents;
- (h) warranty claims;
- (i) location data specifically from devices which may include Davey mobile Android and iOS Apps which use Bluetooth (e.g. Henden Water Quality Hub) even when the App is closed or not in use and device identifiers;
- (j) images from video surveillance and other cameras used in the Reece Group; and
- (k) customer survey information.

5 CREDIT PROVIDER INFORMATION

5.1 To the extent that the Reece Group provides you with credit, reviews the credit provided or considers your eligibility for credit, the Reece Group may collect, in addition to the information noted above;

- (a) your current and former employment details;
- (b) details of your assets, income and expenditure;
- (c) records of any credit provider asking a credit reporting body for information about you in relation to any credit application, including the type and amount of credit applied for;
- (d) details included in any application for credit made by you to Reece Group previously or credit provided to you previously;
- (e) your credit payment information or any default information;
- (f) information regarding court proceedings related to your credit, your insolvency information and any other credit-related publicly available information relating to you;
- (g) credit scores, ratings, summaries, evaluations and other information relating to your credit-worthiness which is derived by the Reece Group or its agents or by credit reporting bodies;
- (h) information from you personally or from any person authorised to act on your behalf or authorised to provide your credit information to the Reece Group;
- (i) information from any co-credit applicants, from your co guarantors or proposed guarantors;
- (j) information from your accountant or referees that you nominate;
- (k) information from publicly available sources, including title searches, Personal Property Security Act searches, internet search platforms and social media platforms; and
- (l) information from service providers that assist Reece Group to provide credit or administer the credit accounts that we provide, including commercial information service providers, credit application assessors, debt collectors and lawyers.

5.2 We may use and disclose credit information:

- (a) to form decisions as to whether to provide you, or any entity associated with you, with credit, to accept you as a guarantor or to provide credit to a person or

entity for which you might act as a guarantor;

- (b) to make assessments relating to your credit-worthiness which are used in Reece Group's ongoing decision-making processes regarding the provision of credit and the amount of such credit;
- (c) to participate in the credit reporting system and to provide information to credit reporting bodies in certain circumstances, including where you consent to the disclosure, where you fail to meet payment obligations in relation to credit provided by Reece Group or if in Reece Group's opinion you have committed a serious credit infringement (for example, if Reece Group reasonably believes there has been any fraud related to a credit provided to you or if Reece Group has, in certain circumstances, been unable to contact you after a default has occurred in your credit payments);
- (d) to undertake debt recovery and enforcement activities, including in relation to guarantors, and to deal with credit infringements related to credit provided by Reece Group; and
- (e) to deal with complaints and meet legal and regulatory requirements.

5.3 Credit reporting bodies are able, under applicable privacy regulation, to handle information relating to credit.

5.4 If the Reece Group provides your credit information to any credit reporting body, that credit reporting body may include your credit information in reports provided to other credit providers to assist such other credit providers to assess your credit-worthiness.

5.5 The Reece Group may share information with the credit reporting bodies noted;

- (a) Equifax Pty Ltd
LEVEL 15, 100 ARTHUR
STREET
NORTH SYDNEY NSW 2060
Tel: 13 8332
- (b) Creditor Watch Pty Ltd
GPO Box 276
Sydney NSW 2001
Tel: 1300 50 13 12
- (c) Ilion Australia Pty Ltd
G, 479 ST KILDA ROAD
MELBOURNE VIC 3004
Tel: 13 23 33

6 POWERUP (A BUSINESS NAME OF REECE PROJECT SUPPLY PTY LTD)

6.1 PowerUp collects personal information to provide training and assessment services.

6.2 Personal and sensitive information is collected through the enrolment process, payment of fees and PowerUp's functions as a registered training organisation.

6.3 The information is collected in accordance with the Standards for Registered Training Organisations 2015, the National VET Regulator Act 2011, Data Provision

Requirements and the requirements for Total VET reporting.

6.4 Personal information that is collected includes:

- (a) Address
- (b) Contact details (telephone and email)
- (c) Postal address
- (d) Date of birth
- (e) Gender
- (f) Unique student identifier
- (g) Emergency contact details
- (h) Employment status including employment details (where necessary)
- (i) Language spoken
- (j) Reasons for study
- (k) Education background
- (l) Other legal requirements

6.5 Sensitive information that is collected includes:

- (a) Ethnicity and origin
- (b) Language, literacy and numeracy support needs
- (c) Health, disability and support needs
- (d) Financial details

7 DISCLOSURE OF PERSONAL INFORMATION BY POWERUP

7.1 Personal information about participants studying with PowerUp may be shared with Commonwealth and State Government agencies as required. Information regarding participation and enrolment will be shared with the Australian Skills Quality Authority (ASQA) and the National Centre for Vocational Education Research (NCVER) and the Department of Education, Skills and Employment (DESE). For students studying and accessing government funding, it is important that you are aware that information is shared with the agency responsible for the funding.

7.2 PowerUp does not disclose an individual's personal information to another person or organisation unless:

- (a) the individual concerned is aware that information is passed to that person or organisation;
- (b) the individual concerned has given written consent to the disclosure;
- (c) Powerup believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to life or health of the individual concerned or of another person;
- (d) the disclosure is required or authorised by or under law; or
- (e) the disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue.

7.3 Any person to whom personal information is disclosed as detailed in this policy is not to disclose or use the information for any other purpose than what it was supplied to

them for.

8 HOW WE HOLD YOUR INFORMATION

- 8.1 Depending on the circumstances, the Reece Group may hold your information in either hardcopy or electronic form, or both.

9 HOW WE USE YOUR INFORMATION

- 9.1 We use your information (where applicable):
- (a) for all purposes to which you have expressly or implicitly consented;
 - (b) To process your transactions and provide you with our products and services and providing details about the Reece Foundation and its objectives;
 - (c) Delivery of products and services to you;
 - (d) To assess eligibility for trade accounts;
 - (e) To administer and manage our relationship with you and improve our communication;
 - (f) to allow us to analyse your use of our websites to evaluate and improve our performance and to provide a better customer experience on the sites;
 - (g) For the provision of information to manufacturers in the event of a recall of products and to warranty service providers;
 - (h) For internal purposes such as procedural assessments, risk management, product and service reviews, staff training, accounting and billing;
 - (i) Statistical or research purposes and reporting;
 - (j) To register interests on the Personal Property Securities Register;
 - (k) to identify and inform you of products and services that may be of interest to you including direct marketing to you; and
 - (l) to administer surveys, competitions or other promotional activities or events conducted, sponsored or managed by us or our business partners.

10 DISCLOSURE OF INFORMATION

- 10.1 We will only use or disclose your information for a purpose that is related to the use of your information specified above.
- 10.2 We will only use or disclose that information after having taken reasonable steps to ensure that the information is accurate, up to date, complete, relevant and not misleading.
- 10.3 Disclosure may be made to:
- (a) organisations that provide us with professional advice, such as solicitors, accountants and business advisors;
 - (b) Third party contractors to whom we out-source certain functions, such as mailing houses, electronic network administrators, IT providers, security services and debt collection agencies;
 - (c) Credit reporting agencies and other credit providers;
 - (d) Marketing, advertising and promotional services providers and event organisers;
 - (e) Third parties to facilitate the provision of products or services to you (e.g.

manufacturers, suppliers, couriers and installers);

- (f) Third party' platforms which display advertising or content based on your information or preferences (including social media and search engines);
 - (g) Third parties who provide services in connection with our business operations, undertaking data monitoring, data analysis, data matching activities, monitoring trends in customer preferences and the operation and maintenance of our websites as well as other online application;
 - (h) Third parties who we share information with for loss prevention and law enforcement purposes;
 - (i) Law enforcement agencies, government agencies or other third parties where required or authorised by law; and
 - (j) Other persons disclosed to you at the time the relevant information is collected.
- 10.4 However, where possible, we take contractual measures, and in all other circumstances, take all reasonable measures, with our contractors to ensure that they comply with the privacy standards set out in the applicable Privacy Laws. We may also disclose information where it is expressly permitted under the applicable Privacy Laws, for example, where it is with your consent or where we are legally required to do so, such as under a court order or taxation laws.

11 RETENTION OF INFORMATION

- 11.1 We will retain your information, only for as long as the information is needed for the purposes set forth in this Policy and for any additional period that may be required or permitted by law.

12 WHAT ARE YOUR ADDITIONAL RIGHTS?

- 12.1 In addition to the rights provided in this section, you may at any time ask us to erase, restrict or port your information and object to the use of your information. When data processing is based on your consent, you have the right to withdraw your consent at any time by sending a request to the email address privacy.officer@reece.com.au.

13 COOKIES

- 13.1 We may use "cookies" and similar technology on our websites and in other technology applications. The use of such technologies is an industry standard and helps to monitor the effectiveness of advertising and how visitors use our websites/applications. We may use such technologies to generate statistics, measure your activity, improve the usefulness of our websites/applications and to enhance the "customer" experience. If you prefer not to receive cookies you can adjust your Internet browser to refuse cookies or to warn you when cookies are being used. However, our websites may not function properly or optimally if cookies have been turned off.
- 13.2 The Reece Group may also collect information about you when you interact with our websites.

14 SOCIAL MEDIA

- 14.1 The Reece Group use social networking services and when you communicate with the Reece Group, via social media, we may collect information about you as part of the communications.

15 DIRECT MARKETING

- 15.1 Subject to the requirements under the Spam Act 2003 (Cth) and Do Not Call Register Act 2006 (Cth) where you have consented to the Reece Group directly marketing to you about goods and services that we believe may be of interest to you, you are entitled

to withdraw that consent at any time.

- 15.2 If so, please inform our Privacy Officer of this in writing by mail at Reece Australia Pty Ltd Private Bag 57 Balmain Street, Cremorne Vic 3121 or by email to privacy.officer@reece.com.au and we'll ensure that your name is removed from our direct marketing list.

16 TRANSFER OF YOUR INFORMATION OVERSEAS

- 16.1 We will only transfer your information overseas if the transfer is in accordance with the applicable Privacy Laws.

17 HOW WE SECURE YOUR INFORMATION

- 17.1 We hold all hardcopy and electronic records of information in a secure manner to ensure that they are protected from unauthorised access, modification or disclosure. Our staff follow strict information handling procedures and we only permit those staff whose tasks require use of your information to access it. We delete your information once it is no longer needed or required to be kept by law by deleting electronic records.

18 YOUR RIGHT OF ACCESS

- 18.1 You may request access to your information at any time by sending a written request to our Reece Australia Pty Ltd Privacy Officer by mail at Private Bag 57, Balmain Street, Cremorne, Victoria 3121, Australia or by email to privacy.officer@reece.com.au
- 18.2 In your request, please state how you would like to obtain access. For example, you may like to inspect our records at our premises, or you may prefer to be sent a photocopy or an electronic version of your information.
- 18.3 You do not need to provide a reason for your request. Once our Privacy Officer has verified your identity, your request will be forwarded to our information systems manager who will arrange for access to be provided to you in an appropriate manner within 14 days.
- 18.4 We may charge a small fee for providing access if it requires a significant amount of time to locate your information or to collate or present it in an appropriate form. Our Privacy Officer will follow up your request to ensure that the level of access with which you have been provided is to your satisfaction.
- 18.5 In rare circumstances, and only where it is permitted under the applicable Privacy Laws, we may not be able to provide you with access to your information; for example, where it will have an unreasonable impact upon the privacy of others, where it relates to legal proceedings between us through which the information would not otherwise be available, where it would be prejudicial to negotiations we are holding with you, where we are required by law to withhold the information or where it would reveal information relating to our commercially sensitive decision making processes. If we are unable to provide you with access, we will state why this is so and consider whether the use of an intermediary would be appropriate to provide you with an explanation of your information.

19 YOU MAY CORRECT YOUR INFORMATION

- 19.1 If your information is inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request we correct the information and we will consider your request.
- 19.2 You are entitled to provide us with a statement of the correction to the information we hold and to request that we attach the statement to the information that we hold.

20 YOUR RIGHT TO LODGE A COMPLAINT

- 20.1 If you are not satisfied with how we have handled your information or want to make a

complaint you are entitled to lodge a complaint with the Australian Federal Privacy Commissioner. Information regarding how to lodge a complaint is available from the Commissioner's website at www.oaic.gov.au or by ringing the Commissioner's information line on 1300 363 992.

- 20.2 However, before investigating a complaint, the Commissioner usually requests that they be satisfied that you have first expressed your concern to us to afford us an opportunity to resolve the complaint directly, unless it is inappropriate for you to do so.
- 20.3 You may lodge a complaint with our Privacy Officer either by mail at Reece Australia Pty Ltd Private Bag 57 Balmain Street, Victoria, Australia 3121, or by email to privacy.officer@reece.com.au
- 20.4 We will inform you of who will handle your complaint and you may contact our Privacy Officer to enquire about its stage of progress at any time. We will go to great lengths to ensure that your complaint is resolved to your satisfaction.

21 WE MAY NEED TO CHANGE OUR POLICY FROM TIME TO TIME

- 21.1 Due to changing business circumstances, we may need to change our policy from time to time. If we do, we will endeavour to ensure that your overall level of privacy protection is not diminished and will publish the changes on our website. Any actions that we have taken before the change will continue to be regulated by the policy that existed before the changes were made.

22 FURTHER INFORMATION

- 22.1 We are happy to provide you with further information regarding your privacy. If you have any queries or requests in this respect, please contact our Privacy Officer either by mail to the Reece Group Private Bag 57 Balmain Street, Cremorne Vic 3121 or by email to privacy.officer@reece.com.au.