

Privacy Policy

CURRENT AS AT 23 May 2023

1. Introduction

- (a) At Euro Chill Pty Ltd ACN 087 789 099 (“**Euro Chill**”, “**we**”, “**us**” or “**our**”), your privacy is important to us. We are committed to protecting your privacy when managing your personal information.
- (b) In this policy, “**personal information**” means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or recorded in a material form or not.
- (c) We have policies and procedures to ensure that all personal information is handled carefully and securely.
- (d) The purpose of this Privacy Policy is to tell you:
 - (i) what kind of personal information we may gather about you and our methods of collection;
 - (ii) how we may use that information and the choices you have regarding our use of such information;
 - (iii) whether we disclose your personal information to anyone;
 - (iv) how you may enquire about, access and/or seek correction of your personal information and our access and correction handling procedure; and
 - (v) how you may alert us about an alleged breach of the APPs and our complaint handling procedure.

2. Kinds of personal information we collect

- (a) The kinds of personal information we collect from you will depend on the circumstances of collection and on the product or service that we are providing to you.

Personal information and sensitive information

- (b) We collect personal information, such as:
 - (i) your personal details (eg your name and date of birth);
 - (ii) your contact details (eg address, phone number and email address);
 - (iii) your payment information (eg your credit card details);
 - (iv) information about your interests and preferences;
 - (v) if you are applying for employment with us, information that is relevant to the prospective employment, including information contained in your application and resume); and
 - (vi) any other information you provide to us.
- (c) You acknowledge that the personal information we collect from you is your own information or information which you have been authorised to provide us. If you are providing us with personal information about another person, you acknowledge you have notified them about the contents of this Privacy Policy.
- (d) Euro Chill does not generally collect sensitive information, such as racial or ethnicity information, political opinions or associations, criminal records or health information. However, with your prior

consent, Euro Chill may collect sensitive information from you in the course of considering an application for employment.

Unsolicited information

- (e) Where unsolicited information is received by Euro Chill (such as through our social media pages) we will determine, within a reasonable period of time, whether or not we would be permitted to collect the information under the APPs. If it would not be permitted for us to collect the information, we will destroy the information or ensure it is de-identified as soon as practicable. Otherwise, we may retain the information in accordance with the terms of this policy.

Anonymous information

- (f) We may collect anonymous information about visitors to any websites, which are owned, operated or under the control of Euro Chill including eurochill.com.au (each, a “**website**”), such as:
 - (i) statistical information about the number of visitors to the websites and the date, time and duration of visits;
 - (ii) the name of the domain/URL from which a visitor accesses our websites; and
 - (iii) the visitor’s internet protocol address.
- (g) We do not collect information about the identity of the visitors to our websites, unless they voluntarily provide that information.

3. How we collect personal information

- (a) We will only collect personal information through lawful and fair means and not in an unreasonably intrusive way.
- (b) Generally, Euro Chill collects your personal information when you deal with us directly, including:
 - (i) when you request products or services from us;
 - (ii) if you complete a survey, make an enquiry, provide feedback or make a complaint to us;
 - (iii) when you sign up to use a particular service such as our newsletters, mail outs (about product updates and developments, special events or promotions), loyalty or rewards program or enter into a competition operated by us; and
 - (iv) via our website or our social media pages, via forms or correspondence (ie by mail or email), over the phone or in person.
- (c) Euro Chill may also collect personal information through our suppliers, related bodies corporate and our third party service providers (such as data relating to survey responses) so that we may provide a better or more relevant product to you.

4. Use of personal information

Purposes of use

- (a) Euro Chill will use your personal information for the purpose for which it was collected or a related secondary purpose which you would reasonably expect it to be used for. Euro Chill will not use it for any other purpose without your consent, unless permitted or required by law.
- (b) Generally, we will use your personal information for the following purposes:

- (i) providing the products and/or services you have requested from us, including:
 - (A) to process orders for our products or services;
 - (B) to deliver the products or services to you;
 - (C) to register you for a service requested by you, such as our newsletter(s) and e-newsletters, mail outs, rewards program(s) or competitions and administering such services;
 - (D) to handle warranty claims or repairs; and
 - (E) to respond to any enquiries, feedback or complaints made by you;
- (ii) direct marketing of products and services which we believe may interest you, including product updates and developments, special events or promotions;
- (iii) improving our products and services and making them more relevant to you;
- (iv) improving our website or social media pages;
- (v) processing and assessing employment applications;
- (vi) managing our internal business operations and processes; and
- (vii) any other purposes you have consented to.

Direct marketing

- (c) Euro Chill will only use your personal information for the purpose of sending you marketing communications if we have your consent, or in circumstances where we have collected the information directly from you and you would reasonably expect that your personal information would be used or disclosed for this purpose.
- (d) You may “opt out” of receiving marketing communications by using the unsubscribe facility in a communication we send you or contacting **our Privacy Officer** via the contact details provided below.

Use of anonymous information

- (e) Euro Chill gathers anonymous information to:
 - (i) monitor the use of our website and social media pages; and
 - (ii) help us make improvements to our website and social media pages.

5. Disclosure

- (a) There will be occasions where it will be necessary for Euro Chill to disclose your personal information to third parties.
- (b) Examples of the types of third parties we may disclose your personal information to include:
 - (i) suppliers, contractors and third party service providers we use in the ordinary course of our business, such as to assist with the delivery of the product or service. This includes organisations such as marketing agencies, data processing companies, delivery or transport companies, or finance agencies or debt collection agencies;
 - (ii) other members of our corporate group in connection with the purposes for which you have provided your personal information;

- (iii) our insurer; and
- (iv) government authorities or other third parties as required by law.

6. No sale of personal information

Under no circumstances will Euro Chill sell or receive payment for licensing or disclosing your personal information.

7. Security

- (a) Euro Chill has implemented security measures to ensure personal information is protected against loss, misuse, interference and unauthorised access.
- (b) Only authorised Euro Chill suppliers, personnel and contractors are provided access to personal information and have agreed to maintain its security.
- (c) Reasonable steps are taken to destroy or permanently de-identify any personal information that is no longer required.
- (d) We review and update our security measures in light of current technologies. You should, however, be aware that the internet is not a secure environment and information sent via the internet (including email) cannot be guaranteed to be totally secure.

8. Access and correction

- (a) You may request to access or correct personal information that Euro Chill holds about you by making a request to our Privacy Officer using the details provided below.
- (b) We will endeavour to process any requests for access to personal information within a reasonable period of time.
- (c) Euro Chill may charge a nominal fee for supplying personal information.

9. Complaints about privacy and our complaint handling procedure

- (a) If you have any complaints relating to our management of your personal information, please forward your complaint in writing to our Privacy Officer at the address or email address below.
- (b) Our Privacy Officer will consider the complaint and advise you of their decision in writing within a reasonable time from receipt of the complaint.
- (c) If you are not satisfied with our decision, you can contact the Office of the Australian Information Commissioner using the contact details available [here](#).

10. Privacy Officer

Privacy Officer
1/13-15 Kevlar Cl Braeside, VIC 3195
1300 459 140
query@eurochill.com.au

11. Changes to Privacy Policy

Euro Chill reserves the right to modify or amend this Privacy Policy at any time. The effective date will be displayed at the beginning of the policy.

Credit Reporting Policy

1. Overview

- (a) Euro Chill provides 'commercial credit' for the purposes of the Privacy Act 1998 (Cth) ("**Privacy Act**") to businesses who apply for credit in relation to our goods and services. We do not provide any consumer credit.
- (b) This policy provides details about our management of credit information and credit eligibility information.

2. What is credit information and credit eligibility information?

- (a) "**Credit information**" relates mainly to your credit-related dealings with us and comprises various types of information collected by credit reporting bodies ("**CRBs**") that report on consumer credit worthiness. We may collect or generate various categories of credit information about you.
- (b) "**Credit eligibility information**" is mostly information provided by CRBs relating to your dealings with other credit providers (for example, financial institutions that provide you with loans or other businesses that provide you with credit in connection with their products or services).
- (c) "**Credit information**" and "**credit eligibility information**" may include:
 - (i) identification information, including your name, address, date of birth or employer);
 - (ii) consumer credit liability information, including information about consumer credit accounts you hold with other credit providers;
 - (iii) details about information requests made to CRBs including the fact that we or another credit provider have requested credit reporting information about you from a CRB to assess a credit application and various details about the credit you have applied for;
 - (iv) default information, including information about overdue payments owed by you in connection with consumer credit which have been disclosed to a CRB by other credit providers;
 - (v) payment information, including information that an overdue payment has been repaid;
 - (vi) information about serious credit infringements;
 - (vii) new arrangement information, including information about certain credit-related arrangements you may have entered with another credit provider in connection with a consumer credit default or serious credit infringement;
 - (viii) court proceedings information, including information about certain credit-related judgments;
 - (ix) personal insolvency information, including information recorded in the National Personal Insolvency Index about bankruptcy or various other insolvency-related matters; and
 - (x) publicly available information about activities relating to credit worthiness.
- (d) Credit eligibility also includes credit worthiness information that we may derive from data we receive from a CRB, such as a credit risk score.

3. How we collect credit information and credit eligibility information

- (a) We may collect credit information about you in any of the circumstances described in our Privacy Policy under the heading "How we collect your personal information".

- (b) We collect credit eligibility information from CRBs but may collect it from other third parties where permitted by the Privacy Act (such as from other credit providers with your consent).
- (c) We store and safeguard your credit information and credit eligibility information in the manner described in the Privacy Policy above.

4. How and why we use and disclose your credit information and credit eligibility information

- (a) We may disclose your credit information to CRBs. Those CRBs may then include that information in credit reporting information that they provide to other credit providers to assist them to assess your credit worthiness. For example, we may disclose to a CRB the type of commercial credit, and the amount of credit, sought in your application for credit with us. We may also use and disclose your credit information for other purposes and in other circumstances as described in our Privacy Policy or as permitted by the Privacy Act.
- (b) Our use and disclosure of credit eligibility information is regulated by provisions of Part IIIA of the Privacy Act and the Credit Reporting Privacy Code. We will only use or disclose such information for purposes permitted by those provisions, such as:
 - (i) to process an application for credit with us in relation to our goods and services;
 - (ii) to manage the commercial credit we provide and collect overdue payments; or
 - (iii) where a disclosure is required or authorised under an Australian law or a court/tribunal order.

5. Correction of and access to credit information and credit eligibility information

To request correction of, or access to, your credit information or credit eligibility information please see the heading "Access and correction" in our Privacy Policy.

6. Your rights in relation to CRBs

You have the right to make a request to CRBs:

- (a) not to use your credit information for the purposes of pre-screening of direct marketing by a credit provider; and
- (b) not to use or disclose your credit information, if you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud.

7. Complaints regarding our compliance with credit reporting requirements

- (a) If you have any complaints relating to our management of your credit information or credit eligibility information, please forward your complaint in writing to our Privacy Officer at the address or email address set out in our Privacy Policy.
- (b) Our Privacy Officer will consider the complaint and advise you of their decision in writing within a reasonable time from receipt of the complaint.
- (c) If you are not satisfied with our decision, you can contact the Office of the Australian Information Commissioner using the contact details available [here](#).