

Privacy Policy

Introduction

ELTRAK INTERNATIONAL AND STAFF PTY LTD, trading as VATER HARWARE ABN 99 007 840 173 (referred to as “we”, “us”, “our”, or “Vater Hardware”), values and respects the privacy and rights of the people we deal with. Vater Hardware is committed to protecting your privacy and complying with the *Privacy Act 1988* (Cth) (“Privacy Act”), as amended by the *Privacy and Other Legislation Amendment Act 2024* (“Amendment Act”), and the Australian Privacy Principles (“APPs”).

The Privacy Policy (“Policy”) describes how we collect, store, use and disclose your information, including personal information, and how we maintain the quality and security of your personal information.

In this Policy, ‘personal information’ has the meaning given in the Privacy Act. It refers to information or an opinion about an identified individual, or an individual who is reasonably identifiable. Some personal information is considered ‘sensitive information’, which includes, but is not limited to, details such as racial or ethnic origin, political opinions, criminal record, or health information.

Collection of Information

By providing your information, you grant us permission to store and use your information, including personal information, as reasonably required by us either now or in the future. Your information will be dealt with in accordance with this Policy and collected only by lawful and fair means. We may collect information from you in person, via our website, email, phone, or through third-party services. Including the online order forms, participating or entering competitions or promotions, job applications and account applications.

Personal information that you provide to us may include the following details:

- Name and contact details (such as address, phone, email), payment information and order details when you purchase from us in person or through the website;
- Name and contact details (such as address, phone, email) when you enter competitions, or participate in promotions;
- Information (such as name, phone, email, subject and message details) you provide when you contact us with feedback, sales inquiries or complaints; and
- Information provided through job applications, account applications or information provided, stored and obtained during the course of employment with our associated entities, as an employee, contractor, supplier or in any other capacity and us.

The information that we collect is directly related to our core business areas such as Manufacture, Marketing & Distribution, Retail Sales, Scuba Diving training, Scuba Diving



trips, Aquaculture, Property Development, retail and wholesale Plant Nurseries and Landscaping. We collect your information to offer or provide our services to you, to identify our clients and potential clients, to manage risk, to develop insights to our business and markets, to comply with the law and for any other purpose to which you have consented.

You have the option of not identifying yourself unless you are required by law to do so or where you are retaining our services and ordering products from our website. There are certain circumstances where we are required by law to collect and retain personal information. In these circumstances, it is not possible for you to use a pseudonym or elect to not identify yourself. We will advise you when this is the case.

You acknowledge and agree that in providing this information, you consent to us collecting, storing and using the personal information and that this consent is effective consent under the *Do Not Call Register Act 2006* (Cth), the *Spam Act 2003* (Cth) and the *Privacy Act 1988* (Cth).

Use of Information

We may use your personal information to:

- Provide products and services;
- Process transactions and deliver items;
- Communicate with you regarding promotions and updates;
- Improve our services and website; and
- Conduct internal business operations and respond to inquiries.

Sensitive Information

We do not generally collect sensitive information. If required, such as during job applications, we will obtain your consent first.

Cookies and Tracking Technologies

Our website uses different types of cookies, including essential cookies required for website functionality, analytics cookies to understand how visitors use the site, and advertising cookies to tailor promotions and advertisements. You can manage cookie preferences through your browser settings. Please be aware that your browsing experience and website functionality may be affected if cookies settings are limited or blocked.

Unsolicited Information

If we receive unsolicited personal information, we will destroy any and all, or de-identify it as soon as practicable, but only if it is reasonable and lawful to do so.

Retention Policy Clarification

Personal information such as transaction history will generally be retained for a minimum period of seven years or as required by law. Information collected for marketing purposes



may be retained for up to two years after your last interaction with us, following which your information will be securely archived.

Method of Collection

We may collect information via our website, email, phone, in person or through third-party services.

Direct Marketing

We may use your personal information to provide you with promotional materials. You can opt out at any time by contacting our Privacy Officer. (Details listed below)

Sharing Your Personal Information

We will not disclose your personal information to a third party, unless disclosure is:

- necessary for the provision of our services to you;
- required by law;
- necessary to comply with a public duty; and/or
- with your express or implied consent.

In the circumstances that disclosure may be required or necessary, we may share your personal information to the following third parties:

- Third-party service providers (e.g. delivery, marketing, IT services);
- Professional advisors and insurers;
- Regulatory or legal bodies as required; and
- Other parties with your consent.

We will notify you if disclosure is required or necessary to the above third parties.

Consent for Overseas Data Transfers

We may store your data on third-party cloud platforms or servers located outside Australia. Currently servers are privately owned and securely kept locally. We will ensure appropriate safeguards are in place to protect your information if any third-party operations are utilized. Third parties will all need to comply with listed standards or comparable standards.

Security Practices

We take all reasonable safeguards to protect your personal information from misuse, loss, or any unauthorised access or exposure.

We have a range of technical, administrative, and physical security measures including data encryption, secure access protocols, and regular training for personnel. Regular system updates are also performed to ensure compliance with security standards. Third party Information Technology consultants monitor and maintain system operation, firewalls, virus protections and staff/user operations. Access to personal information stored electronically is restricted to authorised persons within our business.



Your Rights

You have the right to request access to, correction of, or deletion of your personal information. You also have the right to object to or withdraw consent for processing of your personal information at any time by contacting the Privacy Officer.

Complaints

If you believe your privacy has been breached, please contact our Privacy Officer. We will investigate and respond accordingly (please allow up to 30 days to respond). If unresolved, you may contact the Office of the Australian Information Commissioner (www.oaic.gov.au).

Exceptions

Where applicable, we may rely on exemptions under the Privacy Act and/or the Amendment Act, including for employee records.

Access and Correction

You may request access to any of your personal information and request us to remove any of your personal information we hold by contacting the Privacy Officer either by phone, mail or email. Further, you can also ask for corrections to be made if you believe that the information we hold is incorrect. In the event that the personal information that you have provided to us changes, is inaccurate or incomplete, you must inform us of this and provide us with the corrected or updated personal information as soon as reasonably practicable as we rely on the personal information that is provided to us. We will endeavor to respond within a reasonable timeframe for any such requests.

Contact Privacy Officer

For inquiries, corrections, or complaints, please contact:

Attention: Privacy Officer

By Post: Vater Hardware, 28-32 Morgan Street, Wingfield 5013

By Phone: (08) 8268 3511

By Email: privacyofficer@vatergroup.com

Changes to this Privacy Policy

We may change the terms of this Policy at any time for any reasons, including complying with the Amendment Act, the Privacy Act and/or APPs. Any updates will be posted on our website. Please note that continued use of our services signifies acceptance of the updated Policy.