

## **Privacy Policy**

### **What does our Privacy Policy cover?**

This Privacy Policy describes the privacy practices for our websites, desktop apps and mobile apps (together they are the “apps”) that include a link to this Privacy Policy, and our marketing and advertising practices.

There are three things that we want you to know before getting into the specifics of our Privacy Policy:

1. Our Privacy Policy posted on our websites was updated in June 2018.
2. Our websites use Google Analytics to help analyse how visitors use our sites. More on that here.
3. Information that we collect through our websites is anonymous by default and personal information is only collected and used when you specifically submit it through an opt-in or a fill-in form on our websites or a third-party hosted website adhering to this Privacy Policy.

Protecting the privacy and confidentiality of personal information within our possession and control is an important aspect of the way that we conduct our business. We strive to protect and respect the personal information of our customers, business partners, employees, and consultants in accordance with all applicable laws.

### **What information do we collect about you?**

The standard internet log and personal behaviour information that we collect on visitors is done in an anonymous form, which means that no personal information is collected on you unless you explicitly submit information to us via a fill-in-the-form on our websites adhering to this Privacy Policy. This anonymous information is generated by cookies and similar technologies about your use of our websites and processed, including your IP address, and is transmitted to Google. This information is processed into statistical reports to evaluate and aggregate visitor usage so that we may optimize our content and marketing to better meet your needs.

We collect certain personal information when you, download our content, place orders online, request information, or when you use our products or services. In registering with us, downloading content, or requesting information, you may provide us with your name, company information and contact information, such as e-mail address, phone number, and shipping address. We may also collect your product interest information, transaction / purchase information, or demographic information.

Certain third parties, including analytics companies like Google, may also automatically collect information about you through our websites, using cookies, web beacons, and device identifiers, including personally identifiable information about your online activities over time and across different websites, devices, online channels and applications when you use our websites.

### **How do we use the information that we collect about you?**

We use personal information collected through our web sites for purposes described in this Privacy Policy and as disclosed to you in connection with our web sites. For example, we may use your information to:

- Provide and deliver products or services you've requested;
- Operate and improve our internal operations, systems, products, and services;
- Understand you and your preferences to enhance your experience;
- Respond to your comments and questions and provide customer service;
- Send you service-related information, including confirmations, invoices, order confirmations, order updates, security alerts, and support and administrative messages;
- Communicate with you and your referrals about promotions, upcoming events, and news about products and services;
- Link or combine information about you with other personal information we get from third parties, to help understand your needs and provide you with better and more personalised service;
- Enforce our terms and conditions or protect our business, partners, or users;
- Protect against, investigate, and deter fraudulent, unauthorized, or illegal activity.

**What are cookies? How does our using them impact you?**

HTTP cookies ("cookies") are small text files stored by your web browser when you use websites. You can control how websites use cookies by configuring your browser's privacy settings (please refer to your browser's help function to learn more about cookie controls). Note that if you disable cookies entirely, our websites may not function properly.

We, and the companies that help us run our business, use cookies in several ways, such as:

- Authenticating and identifying you on our websites so we can provide you the services you requested;
- Keeping track of information you have provided to us through fill-in-the form;
- Remembering your preferences or where you left off in your use of our websites;
- Measuring your use of our websites so that we can improve them, tailor our websites to your likely interests, and conduct market research;

There are other technologies that can be used for similar purposes as cookies, such as HTML5 Local Storage and local shared objects ("LSOs").

We may use HTML5 Local Storage, LSOs, and similar technologies for authenticating you, keeping track of information you have provided to us, and remembering your preferences. When you are using our application offline, we may store information related to how you used that app on your device and then transfer it to our servers the next time you connect online to our service.

Web beacons and embedded scripts are other technologies that we may use in our websites, as well as in some of our emails..

Web beacons are bits of programming code included in web pages and emails that notify us when those web pages or emails have been viewed or clicked on.

Embedded scripts are bits of programming code included within some of our web pages that measure how you use those web pages, such as which links you click. We use this information to improve our websites, tailor our websites to your likely interests, and conduct market research. You may be able to turn off scripting functionality, such as JavaScript, within your browser. Note that if you disable scripting functionality, some of our websites may not function properly.

### **Do we share the information that we collect about you?**

We do not rent, sell, or share personal information about you with other people or non-affiliated companies, except under the following circumstances:

- When we have your permission, including when you choose to share information;
- We may securely provide personal information to trusted third-party partners who work on behalf of or with us to provide us with services. For example, these companies may use your personal information to assist with the ordering and delivery process of your order. We maintain contracts with these companies restricting their access, use and disclosure of personal data in compliance with this Privacy Policy. We may be liable if they fail to meet those obligations and we are responsible for the event-giving rise to the damage.
- We may disclose personal information to comply with laws or in response to legal process, for example, in response to a court order or a subpoena. We also may disclose personal information in response to a law enforcement agency's request, or where we believe it is necessary to investigate, verify, prevent, enforce compliance with, or take action regarding:
  - illegal or suspected illegal activities;
  - suspected fraud;
  - situations involving potential threats to the physical safety of any person;
  - protection of the rights and property of Zinc Group, our agents, customers or others;
  - violations or suspected violations of our agreements, policies, Terms of Use or End User License Agreements; or
  - as otherwise required or permitted by law or consistent with legal requirements.
- We reserve the right to transfer or disclose personal information in our system in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or other proceeding involving sale, transfer, divestiture or assignment of all or a portion of our business or assets to a different entity.
- Finally, we may also share aggregated, anonymized or statistical information about you, including demographics data, with others for a variety of purposes, including for their own uses, for example, for improving their products and services.

An Internet protocol (“IP”) address is the unique number assigned to your server or Internet Service Provider. We may track such IP addresses for system administration, to report aggregate information, site tracking, to prevent our servers from being abused and for other uses described in this Privacy Policy.

### **Is the information that we collect kept safe and how is it stored?**

We understand that the security of your personal information is important. We provide reasonable administrative, technical, and physical security controls to protect your personal information throughout our websites.

However, despite our best efforts, no security controls are 100% effective and no company, including us, can fully eliminate or warrant the security risks associated with personal information. To help protect you, please use a strong password and protect your user names and passwords to help prevent others from accessing your accounts and services.

We are a global company with affiliates, varied business processes, management structures, and technical systems that may cross borders. Information collected by us, or on our behalf, may be stored on your computers, on your mobile devices, or on our servers, and may be transferred to, accessed from, or stored and processed in the Australia or other countries where we, or our service providers, maintain facilities or support centers, including jurisdictions that may not have data privacy laws that provide protections equivalent to those provided in your home country.

Personal information we collect may be retained for as long as needed to fulfil legitimate business purposes, including the purposes outlined in this Privacy Policy, or for a period of time specifically required or allowed by applicable regulations or laws in countries where our products or services are purchased.

### **Can I correct or review my personal information?**

Our marketing communications tell you how to “opt-out” of receiving further marketing communications. If you opt out, we may still send you non-marketing communications. Non-marketing communications include communications about your accounts and orders placed through our web sites, and, as allowed by applicable law, requests for your participation in surveys. You may also contact our Customer Service teams ([orders@zinc.com.au](mailto:orders@zinc.com.au)) at any time to unsubscribe and let us know that you no longer wish to receive further marketing communications.

Upon request, we will provide an individual with access to identifying information that we have collected about them (provided that they have given adequate proof of identity). We also offer individuals the ability to have inaccuracies corrected within their contact information. You may also request deletion of your personal information. We will honour requests as required by law and subject to our business and legal needs to retain your data. These information requests can be made by sending us an e-mail using the customer service e-mail provided above.

When you use our websites, you can usually choose to set your browser to remove cookies and to reject cookies from our servers. If you choose to remove cookies or reject cookies, this could affect certain features

or services of our websites. Cookie management tools provided by your browser may not remove Flash cookies. If you delete your cookies, use a different browser, or buy a new computer, you will need to renew your opt-out choices.

While we and others give you certain choices, as further outlined in this Privacy Policy, there are many ways that web browser signals and similar mechanisms can indicate your choice to disable tracking, and we may not be aware of nor honour every mechanism.

**Who should I contact if I have questions or concerns?**

You may direct any inquiries or complaints concerning our Privacy Shield compliance to our Customer Service team at [orders@zinc.com.au](mailto:orders@zinc.com.au) We will respond within five (5) business days (or even sooner). Written communication should be sent to:

Zinc Group

Attention: Operations Director

32 Ellis Street

South Yarra,

Melbourne, Victoria, Australia, 3141