adaptalift GROUP

Policy

Privacy Policy

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DOCUMENT PURPOSE

Adapt-A-Lift Group Pty Ltd ACN 605 149 568, its Associated Entities and Related Bodies Corporate (**Adapt-A-Lift, us, we, our**) are committed to providing quality services to you and following responsible privacy practices. This Privacy Policy outlines our ongoing obligations to you in respect of how we collect, use, disclose, store, handle and protect your Personal Information.

Adapt-A-Lift has adopted the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988 (Cth)* (**Privacy Act**). The APPS govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information. A copy of the APPs may be obtained from the website of the Office of the Australian Information Commissioner at www.oaic.gov.au/privacy/australian-privacy-principles.

APPLICATION

This Privacy Policy covers Adapt-A-Lift and all its Associated Entities and Related Bodies Corporate unless the Associated Entity or Related Body Corporate has its own policy. Without limitation, this includes, Adaptalift Truck Rentals Pty Ltd, Adapt Capital Pty Ltd, Pacific Materials Handling Pty Ltd and all entities that form part of the Adaptalift Group of companies.

INTENDED AUDIENCE – SCOPE

This Privacy Policy applies to all persons that Adapt-A-Lift collects Personal Information about. This includes Personal Information we receive from Adapt-A-Lift suppliers, customers, agents, subcontractors or any other person or entity. As well as applying to our interactions with you, this Privacy Policy also applies to all information collected through our website www.adaptalift.com.au and any other websites, platforms and/or mobile apps or portals we operate, including the Adapt-A-Lift App (**App**) (collectively, data collected through our website, through the access or use of any online portal or through the App is called **Adaptalift Connect**).

DOCUMENT CONTROL

This Privacy Policy is updated from time to time to reflect changes (including regulatory changes and the way we operate our business). An up-to-date version of this Privacy Policy is available at any time on this page, and through Adaptalift Connect. Any offline or printed copies may potentially be out of date.

If we update this Privacy Policy, it will be taken to apply to you and your continued dealings with us from the date it is uploaded to our website and available through any medium that is part of Adaptalift Connect.

You are responsible for reviewing this Privacy Policy periodically and informing yourself of any changes. We suggest that you check back regularly. If we make significant changes to our Privacy Policy, we will seek to inform you by notice on our website or by email.

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PRIVACY POLICY

1. DEFINITIONS

Word	Meaning
Associated Entities	Has the meaning given to that term by section 50AAA of the *Corporations Act 2001*
Personal Information	Has the meaning given to that term by the Privacy Act
Related Bodies Corporate	Has the meaning given to that term by section 50 of the *Corporations Act 2001 (Cth)*
Sensitive Information	Has the meaning given to that term by the Privacy Act and includes information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information. Sensitive Information is subject to additional protection under the Privacy Act.
You	Means the person or entity that has provided Adapt-A-Lift with the Personal Information and/or the person to which the Personal Information relates

2. WHAT IS PERSONAL INFORMATION AND WHAT TYPES DO WE COLLECT?

In general terms, Personal Information is information (whether fact or opinion) about an individual who is identified or reasonably identified from that information, or other information combined with that information.

Examples of Personal Information include (without limitation) names, addresses, email addresses, phone and fax numbers, financial documents (including accounts), bank statements, tax returns and licence details (including driver's licence).

The types of Personal Information we collect about you will depend on the purpose for which the Personal Information is collected. This can include:

- in the case of customers procuring our products and/or services – your name, billing or shipping address, email address, telephone number(s), your order details, payment information (including credit card information or alternative payment method account information, as this information may be processed by the following payment gateway providers, by way of example: BPoint, NABTransact, Stripe, PayPal and Go Cardless. This list of payment gateway providers may change from time to time);
- in the case of customers that use the ForkTrack service – details regarding use and maintenance of the unit for which ForkTrack is installed (including who is driving the unit);
- in the case of users using our App or any medium that comprises Adaptalift Connect:
    - name, email address, telephone number(s) of the user and passwords given to us by the user;

- usage data on how customers interact with the App, including access dates and times, app features or pages viewed, browser type, app crashes and other system activity;
- device data on how customers interact with the App, including hardware models, device IP address or other unique device identifiers, operating systems and versions, software, advertising identifiers, device motion data and mobile network data; and
- communications data regarding in-App communications; for example, when a user submits a service request through the App, including date and time, as well as the content of the in-App communication;

- in the case of our website users or users accessing any online portal through Adaptalift Connect – technical information and general analytics, such as web browser type and browsing preferences, Internet service provider, referring/exit pages, date/time stamps, IP address, time zone and geolocation data (if applicable), some of which is collected automatically, arising from your use of our website, as well as information about your usage of our website when browsing;
- if you have requested to receive news about exclusive offers, promotions, or events from, us – your name, mailing or street address, email address, and telephone number(s);
- if you have contacted us to make a complaint, provide feedback, submit an enquiry, request a call-back or request a product replacement – your name, mailing or street address, email address, and telephone number(s);
- in the case of trade credit applicants – information required to assess your credit worthiness, including your credit or business history and any trade referees;
- in the case of prospective employees or contractors – information contained in your application or résumé, recorded during any interview, or obtained through any pre-employment checks and working rights (e.g. visa status);
- for existing employees – the information set out above together with government-issued identifiers such as tax file numbers, your partner's or emergency contact's details, your contact details (including mobile number and email address), pre-employment health checks, drivers' licence, qualifications and certificates, pay information (including salary and leave entitlements) and information obtained during the course of any investigation relating to your employment (including for WorkCover purposes);
- in the case of our suppliers and distributors – your name, mailing or street address, email address, and telephone number(s); and
- in the case of our sites where we have CCTV technology installed, CCTV footage and recordings.

Your Personal Information may be processed in accordance with one of our payment gateway providers, and we suggest you familiarise yourself with the relevant provider's privacy policy.
Generally, we will not collect, use or keep Sensitive information about you. However, in certain circumstances we may need to collect limited Sensitive Information about you, such as in connection with your employment with us..

Sensitive Information is not collected for users of Adaptalift Connect.

3. HOW DO WE COLLECT PERSONAL INFORMATION?

We collect Personal Information directly from you in many ways, including when you:

- sign up to and subsequently access or use any of the mediums that collectively comprise Adaptalift Connect (including the App);
- purchase our products or services (or for users of Adaptalift Connect, where you make a service request), including if you provide a credit application;
- sign up to receive news and exclusive offers, promotions, or events;
- enter surveys, competitions, promotions or request information or material from us;
- make inquiries about us or our products or services or otherwise communicate with us by email, by telephone, in person, via a website or otherwise; and
- apply to work with us or are engaged by us as a contractor.

In limited circumstances, we may collect Personal Information about you from publicly available sources (such as the Internet) and from third parties (such as credit reporting bodies, mutual contacts, or if someone makes a purchase on your behalf, or from your referees during the recruitment process if you apply for a job with us). We may also collect Personal Information through third parties such as our service providers or through promotional and marketing activities.

Whilst we will always maintain robust privacy practices, we are not responsible for the privacy practices of third parties, including Equifax and JobAdder, so you should review their relevant privacy policy to satisfy yourself as to how they protect and handle your Personal Information.

4. CAN YOU CHOOSE NOT TO DISCLOSE YOUR PERSONAL INFORMATION?

You do not have to identify yourself or provide any Personal Information if you contact us. You can also notify us that you wish to deal with us using a pseudonym.

However, if we cannot collect Personal Information about you or if you use a pseudonym, we may not be able to provide you with the information or assistance you require, provide our products or services, or extend your credit for the provision of such products or services. For example, we will not be able to send you information you have requested if you have not provided us with a valid email address or telephone number.

5. HOW DO WE USE YOUR PERSONAL INFORMATION?

We use your Personal Information for purposes including managing our business and providing our products and services to you. We also use your Personal Information to:

- provide our products and services (including the App and the services we offer through Adaptalift Connect) to our customers;
- receive goods or services from third parties;

- enable the proper operation and functionality of our products and services, including the App and the services we offer through Adaptalift Connect;
- verify your identity (for example, if you request access to the Personal Information we hold about you);
- assess any credit application and your credit worthiness (including any request for us to supply you with products or services on credit) and to ensure that we comply with any applicable legislation;
- assess whether and to what extent we advance credit or finance to you (including through Adaptalift Finance) and to obtain finance on your behalf and for any request you make to supply you with products;
- obtain from and provide to credit reporting bodies (CRB's) information about your credit worthiness, credit standing, credit history or credit capacity (including, without limitation, information about any payment defaults);
- consider you for a job at Adapt-A-Lift (whether as an employee or contractor) or other relationships with us;
- communicate with you (including about product recalls or upgrades or to notify you of upcoming service requirements) and to address any issues or complaints that we or you may have regarding our relationship and our products and/or services, including via in-App communications;
- prevent, detect and investigate suspicious, fraudulent, criminal or other activity that may cause you, us or others harm, including in relation to our products and services;
- comply with our legal obligations such as notifying you of matters that we may be required by law to do so;
- identify opportunities to improve our products and services and to improve our service to you;
- contact you for your feedback about your experience with Adapt-A-Lift and/or the products or services we have supplied, such as through a customer satisfaction survey;
- gain insights about you so that we can serve you better, understand your preferences and interests, personalise your experience and/or enhance products and services you are offered and receive;
- for direct marketing purposes (see "Direct Marketing" below); and
- contact you regarding any of the above, including via electronic messaging such as SMS and email, by mail, by the App, by phone or in any other lawful manner.

We may also use or disclose your Personal Information for our administrative, marketing (including direct marketing), planning, product or service development, quality control, survey and research purposes and for other purposes to which you have consented, or as otherwise permitted or required by law.

For users of Adaptalift Connect, we may provide a master user with personal information of other registered users within the master user's organisation (including name and contact details). In that case, the master user will be required to comply with the Privacy Act and this Privacy Policy to the extent reasonably practicable.

Technical information and general analytics is used for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are using our website, and to improve our website and our products and services.

6. DIRECT MARKETING

We may use your Personal Information to provide you with information that may be of interest to you about our products or services that we may offer to you, including ForkTrack, forklift driver training and our service programs. We will only send you direct marketing communications (including through mail, SMS, email or the App), including any news and exclusive offers, promotions, or events, where you have consented for us to do so. You may request us not to use your Personal Information for this purpose and may opt-out of receiving direct marketing communications at any time by contacting us or by using opt-out facilities provided in the direct marketing communications.

7. STORAGE AND SECURITY

We store your Personal Information in paper-based files and/or electronic record keeping methods in secure databases. Personal Information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We may combine or link Personal Information we hold about you with other Personal Information about you from third party sources.

Adapt-A-Lift implements commercially reasonable measures to protect and safeguard your Personal Information from misuse, loss, theft and unauthorised access, modification or disclosure.

Your Personal Information will be stored securely on our servers. We maintain computer and network security over these servers, which can only be accessed by a user authorised to access the Personal Information (including with password protection and password encryption in transit and storage).

Personal Information of employees is restricted to Adapt-A-Lift's HR department, the employee's direct manager and senior management of Adapt-A-Lift.

We maintain physical security over Personal Information that is given to us in hard-copy form, by storing it securely at our premises in locked cabinets that can only be accessed by Adapt-A-Lift personnel or authorised persons on a need-to-know basis and in accordance with the Privacy Act. We regularly review and monitor these processes to ensure that the security of your Personal Information is effective and maintained.

Generally, we will retain your Personal Information for the period necessary for the purposes for which your Personal Information was collected (as outlined in this Privacy Policy) unless a longer retention period is required by law or if it is reasonably necessary for us to comply with our legal obligations, resolve a dispute or maintain security.

When Personal Information is no longer required (for example, if you are no longer a customer of Adapt-A-Lift), we will take all reasonable steps to destroy or permanently de-identify your Personal Information, subject to any applicable laws. You can also request us to remove your data.

8. DISCLOSURE OF YOUR PERSONAL INFORMATION

We may disclose your Personal Information to third parties in connection with the purposes described above (see the "How do we use your Personal Information?" section).

This may include disclosing your Personal Information to the following types of third parties:

- our Associated Entities and Related Bodies Corporate;
- any potential third party acquirer of our business or assets, including the App, and advisors to that third party;
- our professional advisers (such as lawyers, accountants or auditors) and insurers;
  our employees, contractors and third party service providers who assist us in performing our functions and activities e.g. payment systems operators and financial institutions, cloud service providers, data storage providers, shipping companies, telecommunications providers, IT support service providers, IT development companies (including for developing the App), dealers (including sub-dealers) and our suppliers and distributors;
- organisations authorised by us to conduct promotional, research or marketing activities;
- mailing, financial processing and financiers (whether for the purpose of us advancing funding to you through Adaptalift Finance or for the purpose of us obtaining finance for acquiring goods on your behalf);
- any other person as required or permitted by law including to a Court (for example, in response to a subpoena), law enforcement agency, State and Federal government authorities or statutory agencies;
- credit reporting bodies (such as Equifax), to conduct credit checks and to notify about payment defaults. The credit reporting agency/ies we work with may change from time to time; and
- any third parties to whom you have authorised us to disclose your information (e.g. referees or account nominees).

We use third party service providers to provide us with web analytics services, such as Google Analytics. You can read more about how Google uses your Personal Information here.

If we disclose your Personal Information to third parties we will use reasonable commercial efforts to ensure that such third parties only use your Personal Information as reasonably required for the purpose of disclosure and in a manner consistent with applicable laws, for example (where commercially practical) by including suitable privacy and confidentiality clauses in our agreement with a third party service provider to which we disclose your Personal Information.

Other than in accordance with this Privacy Policy or any applicable law, we will not disclose your Personal Information to third parties without your prior consent.

9. DISCLOSURE OUTSIDE AUSTRALIA

Your Personal Information may be transferred to recipients located overseas, including to our Related Bodies Corporate and/or Associated Entities in New Zealand. We may also disclose your personal information to some of our suppliers including in Ireland and the United States of America.

If your personal information is sent to a recipient in a country with data protection laws which are at least substantially similar to the Privacy Act and the APPs, and where there are mechanisms available to you to enforce protection of your personal information under that overseas law, we will not be liable for a breach of the Privacy Act or the APPs if your personal information is mishandled in that jurisdiction.

If your personal information is transferred to a jurisdiction which does not have data protection laws as comprehensive as Australia's, we will take commercially reasonable steps to secure a contractual commitment from the recipient to handle your information in accordance with the Privacy Act and the APPs.

10. ONLINE PRIVACY

This section details how we handle any Personal Information you have provided online (whether through our website or otherwise) and the types of technologies we use to collect information online.

When you engage with us online, we use the following technologies to collect technical information and general analytics:

- cookies, which are data files that are placed on your device and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit www.allaboutcookies.org;
- log files, which track actions occurring on our website; and
- web beacons, tags, and pixels, which are electronic files used to record information about how you browse our website.

You may disable your web browser from accepting cookies and other tracking technologies used to collect technical information and general analytics when browsing our website. If you do so, you can still access our website, but it may impact your user experience.

Due to the fact that the Internet is inherently insecure, if you transmit Personal Information to us online (including by email or through our website), Adapt-A-Lift cannot guarantee that the Personal Information will be secure during the process of transmission. Accordingly, you transmit your Personal Information to us online at your own risk and are encouraged to exercise care in sending Personal Information via the internet. Please notify us immediately if you know or reasonably suspect that your Personal Information has been subject to any data breach, breach of security or other unauthorised activity. However, once the Personal Information is with Adapt-A-Lift and on its servers, it will be stored and protected in accordance with this Privacy Policy.

Our online platforms or communications may contain third party links (including on our website or in emails that we send to you). We do not control the collection or use of information by these third

parties. You should contact these third parties directly if you have any questions about their collection and/or use of information. When linking to any other site, you should always check the relevant website's privacy policy before providing any Personal Information. This Privacy Policy only applies to Adapt-A-Lift's privacy practices and not to any third parties.

To the maximum extent permitted by applicable law, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, modification of, disclosure of, misuse of or loss or corruption of any Personal Information. Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law, including the *Competition and Consumer Act 2010* (Cth), or any liability which cannot be excluded due to the operation of applicable laws.

11. ACCESS TO YOUR PERSONAL INFORMATION

You may request access to the Personal Information that we hold about you at any time in order to update or correct it (subject to certain exceptions as set out in the APPs). You should contact Adapt-A-Lift through our contact details under "Privacy Policy Complaints and Enquiries" below if you wish to access your Personal Information for this purpose.

If you request access to your Personal Information, you will be required to verify your identity to ensure your Personal Information is only accessed by you or another person who is authorised to make such a request on your behalf. We will provide access to that information in accordance with the Privacy Act, subject to any exemptions that may apply. If you request access, we may charge you a reasonable administrative fee in limited circumstances and will advise you of that fee in advance once we have assessed your request for access. If you ask to access your Sensitive Information, no fee will be payable for this.

If you request access, Adapt-A-Lift may discuss with you options for providing you with access, including (for example) supplying you with a hard copy or electronic copy of that Personal Information.

If you believe that any Personal Information provided to us is incorrect, incomplete or inaccurate, you can request us to access and amend that Personal Information with the correct information. Where we agree that the information needs to be corrected, we will update it. If we do not agree, you can request that we make a record of your correction request with the relevant information. We will continue to hold the updated Personal Information in accordance with this Privacy Policy.

You can also ask us to notify any third parties that we provided incorrect information to about the correction. We'll try and help where we can - if we can't, then we'll let you know.

12. PRIVACY POLICY COMPLAINTS AND ENQUIRIES

If you have any questions, concerns or complaints about the way in which we have handled your Personal Information, we encourage you to contact us to discuss these concerns.

We are committed to resolving any complaints reasonably and to ensuring that we are doing the right thing by our customers. We will make all reasonable inquiries and your complaint will be assessed with the aim of resolving any issue in a timely and efficient manner.

If you have raised a complaint with us and you are unsatisfied with the outcome or have further concerns about the way we handle your Personal Information, under the Privacy Act, you may complain to the Information Commissioner at the Office of the Australian Information Commissioner, whose contact details are set out below:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
Online: www.oaic.gov.au
Email: enquiries@oaic.gov.au

If you have any complaints or queries about the manner in which your Personal Information has been collected or handled by us or would like to request access to or correction of the Personal Information we hold about you, please contact our Privacy Officer at:

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