	Privacy Policy	Nov 2023
---	-----------------------	-----------------

1.0 Scope

This Privacy Policy documents the handling of personal information by Tetlow Kiln Pty Ltd ABN 26 166 832 300 ("the Company"). 'We', 'our' and 'us' refers to the Company.

2.0 Purpose

The Company recognises the importance of your privacy and is committed to the management and handling of personal information in an open, transparent and lawful way.

The collection and use of your personal information by the Company may be for purposes including:

- to process and administer your dealings as a customer, including assessing your creditworthiness;
- to provide you with the Goods and/or Services you have requested and assisting you with further relevant information including Goods-related information; and
- to administer the transactions entered in to between you and The Company.

The Company is required to comply with the Australian Privacy Act 1988 (Cth) ("Privacy Act") and this policy sets out how the Company seeks to ensure that any personal information we hold about you is collected, used, stored and disclosed in accordance with the Australian Privacy Principles in the Privacy Act.

In this policy 'personal information' and 'sensitive information' have the same meaning as in the Privacy Act.

This policy does not apply to the handling of personal information about the Company's employees. Employee records are exempt from the Privacy Act, but the Company may hold a separate employee privacy policy.

3.0 What information do we collect and hold?

The Company may hold information about individuals who may be members of the general public, customers, business contacts, and others.

The information we typically hold includes:

(a) Customers and the General Public

- Your name, relevant address, telephone number(s) and email address; and
- Dealings with us such as product enquiries and complaints, product promotional activities (non-prescription), adverse event reporting purposes and medical enquiries.

(b) Other individuals such as general business contacts, third party contractors and job applicants

- Your name, business address, business telephone number(s) and email address; and
- Dealings with us in respect of general business relationships, or work and employment references, reports and assessments.
-

4.0 How will we collect and hold your personal information?

We will, wherever possible, collect information about you directly from you. However, on some occasions it may be collected from other sources, such as:

- Agents or service providers including third party data providers;
- Publicly available directories and listings such as telephone directories;
- Newspapers, magazines, professional journals and the electronic media;

- The internet and other electronic communications such as articles and information pieces in which you feature;
- The date, time and domain from which you access our website;
- Credit reporting agencies; Personal interactions and/or communications with our staff.

The personal information we collect may vary depending on your particular interaction with us and will be for a legitimate business purpose. The Company will not collect sensitive information about you, such as information about your gender, race or professional associations, without your consent.

5.0 Collection through The Company website

In addition providing for direct input of personal information, our website (<https://www.accutherm.com.au>) makes use of 'cookies' which are small text files that are stored in the visitor's local browser cache. Using such cookies makes it possible to recognise the visitor's browser in order to optimise the website and simplify its use. Data collected via cookies will not be used to determine the personal identity of the website visitor. Most browsers are set up to accept these cookies automatically. In addition, you can deactivate the storing of cookies or adjust your browser to inform you before the cookie is stored on your computer. The Company's website may not offer full functionality unless you accept cookies.

The Company increasingly makes use of web analytics, including analysis by third party service providers, which may use IP addresses. While this may in some circumstances be 'personal information' neither The Company nor the service providers have any interest in individuals' browser activities and will not use the information to take any action targeted to individuals without having obtained the relevant person's consent.

6.0 What does the Company do with your personal information?

6.1 General

The Company will generally:

- use personal information provided to it for the commercial purposes relating to its dealings with you;
- use personal information collected by it in accordance with its Privacy Policy and the Privacy Act; and
- not sell, trade, give or pass on to any third party any personal information unless such a disclosure is contemplated by and directly related to its commercial dealings with you, or you consent to such a disclosure or such disclosure is required by law.

To enable us to deliver goods and/or services to you, we will disclose your personal information to third party suppliers, contractors and service-providers that assist us to operate our business and to fulfil our contractual obligations to you. As such, your personal information will be provided to third parties such as suppliers, contractors and service-providers involved in supplying goods and/or services including but not limited to the processing of orders, order fulfilment and the collection of outstanding debts.

6.2 Use

Without limiting the generality of the foregoing, personal information collected and held by us may be used for one or more of a variety of purposes depending on the circumstances. These generally include:

- Ordinary business, sales and customer service functions including: communicating with you, order processing and fulfilment, accounting and responding to enquiries or complaints;
 - Meeting legal requirements such as monitoring compliance with relevant regulations and codes of conduct;
-

- Our marketing and market research (including generating customer lists for market research, gaining insights into product use and prescribing practices, sending you product information that may be of interest to you);

Facilitating and planning meetings between our staff and customers, suppliers and contractors; Facilitating the provision of products and services to us.

6.3 Direct marketing

You may request that we do not send you information regarding our programs, events, services or products which we think may be relevant to you (direct marketing). In such a case, we will take reasonable steps to ensure we do not send you marketing material.

6.4 Disclosure

We may disclose information about you in the course of any of the uses described above, including to related businesses and third party service providers, such as for order delivery; marketing; hosting, data storage or archiving; data processing and validation; printing and mailing; and organising conferences. The Company will use only reputable service providers and will ensure that contractual provisions safeguard your privacy.

In circumstances where we buy or sell (or proposes to buy or sell) all or part of its business, we may disclose your personal information to a third party as customer information is generally regarded as a business asset.

We will otherwise only disclose personal information about you to a third party where required by law, including to regulatory authorities.

6.5 Overseas recipients

The Company deals with organisations worldwide and some of the activities necessary to fulfil our contractual obligations to you may be conducted with foreign organisations. Accordingly, we may need to transfer overseas your personal information, and that of your employees, consultants and agents as you may provide to us.

Information held by us about you may in some circumstances be stored on our databases (usually located in Australia).

We also deal with external service providers located in countries within and outside of Australia, and in such cases, we will take reasonable steps, including by contract provisions, to ensure that these service providers do not breach the Australian Privacy Principles.

6.6 Security and retention

We use technical and organisational security precautions to protect your data from misuse, interference or loss and from unauthorised access, modification or disclosure. Any personal data that is provided to us by you through our systems may be encrypted in transit to prevent its possible misuse by third parties, depending on technology used for the application. Our security procedures are continuously reviewed based on new technological developments.


We will delete from its records personal information no longer required or if we are required to retain it (e.g. tax information), then wherever practicable it will be held in a form that does not permit your identity to become apparent.

You may notify us at any time that you do not wish us to retain your personal information, and wherever practicable and lawful we will comply with such a request.

6.7 Access and correction

You may request access to personal information The Company holds about you and may seek to have it corrected if you believe it is inaccurate, out of date, incomplete, irrelevant or misleading. Access or correction requests should be sent to the Privacy Officer at the address below.

Your request should give as much detail as possible to help us locate information about you such as your name, contact details, any former name, and if possible the context, for example, your relationship with us. Please specify any particular information to which you are seeking access.

	Privacy Policy	Nov 2023
---	-----------------------	-----------------

We will respond to your request within 30 days of receipt or within any further time notified to you in writing.

6.8 Enquiries and complaints

All enquiries or complaints regarding your personal informational should be made in writing to:

The Privacy Officer

Tetlow Kiln Pty Ltd

54 Howleys Road,

Notting Hill VIC 3168

Australia

Phone: +61 3 9763 6335

Or by email: sales@tetlow.com.au

The Company will respond to your complaint within 30 days of receipt of your correspondence or within any further time notified to you in writing. If you are not satisfied with the outcome of the response you receive, we can refer you to the Office of the Australian Information Commissioner (as applicable) for further investigation.

The Company reserves the right to make changes to this Privacy Policy from time to time, and will promptly post such revisions to our website.