



Privacy Policy

Updated March 2015

1. Background

1.1 General

This Privacy Policy applies to the Saferoads Group, incorporating Saferoads Holdings Limited (ABN 81 116 668 538) and its subsidiaries (**we, us, our**). We are committed to protecting your privacy, in accordance with applicable Australian privacy laws. This Policy explains how we collect, use, disclose and otherwise handle personal information.

A copy of this Privacy Policy is available on our website at www.saferoads.com.au or you can request a copy by contacting us (details under heading 10 below).

1.2 What is personal information?

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable (for example, your name, email address and phone number).

2. What we collect

2.1 General

The type of personal information that we collect about you depends on the type of dealings you have with us. For example, if you:

- **are a commercial customer**, we collect details such as your name, job title, address, telephone number, email address, payment details and transaction related information (such as your purchasing and payment history with us).
- **are a supplier**, we collect details such as your name, job title, address, telephone number, email address, payment details and transaction related information (such as items we have purchased from you)
- **if you acquire or sell shares in Saferoads Holdings Limited (ASX:SRH)**, we (or our share registry, Boardroom Pty Limited ACN 003 209 836) will collect your name, contact details, holder identification number (if applicable), number of shares traded, communication preferences, payment details and share transaction related information
- **ask to be placed on one of our mailing lists**, we will collect your name and relevant contact details
- **send us an enquiry or provide us with feedback**, we may collect your name, contact details, details of your enquiry or feedback and information about our response
- **attend a trade fair we are exhibiting at**, we may collect your name, job title, email address, phone number, whether you are an exhibitor or a delegate and, if you are a delegate, details about your business and products and services you may be interested in
- **apply for a job with us**, we will collect the information you include in your job application, including your cover letter, resume, contact details and referee reports

2.2 Sensitive information

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection, such as health information. We only collect sensitive information where it is reasonably necessary for our functions or activities and either the relevant individual has consented or we are required or authorised by or under law to do so.

For example, it is company policy to conduct medical and police checks upon recruitment of all new staff.

2.3 Collection of information other than personal information through our website

When you visit our website, some of the information that is collected about your visit is not personal information, as it does not reveal your identity.

Site visit information

For example, we record your server address, the date and time of your visit, the pages you visited, any documents you downloaded, the previous site you visited and the type of device, browser and operating system you used.

We use and disclose this information in anonymous, aggregated form only, for purposes including statistical analysis and to assist us to improve the functionality and usability of our website. You are not individually identified, however we reserve the right to use or disclose this information to try to locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our website, or where we are otherwise required or authorised by law to do so.

Cookies

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies we use do not identify individual users, although they do identify the user's internet browser.

We use cookies to hold anonymous session information. This information is used to personalise your current visit to the website, for example to allow the website to remember who you are.

Most internet browsers are set to accept cookies. If you prefer not to receive them, you can adjust your internet browser to reject cookies, or to notify you when they are being used. There are also software products available that can manage cookies for you. Rejecting cookies can, however, limit the functionality of our website.

3. How we collect personal information

3.1 Methods of collection

We collect personal information in a number of ways, including:

- in person (for example, at trade fairs)
- through our website (for example if you complete the "Contact Us" form)
- over the telephone
- through written correspondence (such as letters, faxes and emails)

4. Why we collect personal information

4.1 General

The main purposes for which we collect, hold, use and disclose personal information are set out below.

- processing transactions for products and services and delivering products and services to customers
- establishing and operating credit accounts for our customers
- administering our shareholder's security holdings, including facilitating dividend payments and corporate communications (including our financial results, annual reports and other information that we may wish to communicate to our shareholders) and carrying out appropriate administration
- promoting ourselves and our products and services, including through direct marketing, events and competitions (see under heading 4.2 below)
- sourcing products and services for our business
- performing research and statistical analysis, including for customer satisfaction and product and service improvement purposes
- protecting the security of our offices, staff, customers, suppliers and merchandise (including theft and fraud prevention)
- answering queries and resolving complaints
- recruiting staff and contractors

We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or which are required or authorised by or under law, or for which you have provided your consent.

4.2 Direct marketing

We may use your personal information to let you know about us and our products and services (including special offers, promotions and events), either where we have your express or implied consent, or where we are otherwise permitted by law to do so. We may contact you for these purposes in a variety of ways, including by mail, email or telephone.

Opting out

Where you have consented to receiving marketing communications from us, your consent will remain current until you advise us otherwise. However, you can opt out at any time, by:

- contacting us (details under heading 10 below)
- using the unsubscribe facility that we include in our commercial electronic messages (such as emails and SMSes)

5. Who we may share your personal information with

We may share your personal information with third parties where appropriate for the purposes set out under heading 4, including:

- our related bodies corporate
- financial institutions for payment processing
- our share registry, Boardroom Pty Limited ACN 003 209 836
- authorised security brokers
- credit reporting bodies (for commercial credit reporting purposes only)
- regulatory, investigative or government bodies (including the ASX and ATO) where required or authorised by law
- referees whose details are provided to us by job applicants
- potential purchasers of our business or a portion of our business
- our agents and contracted service providers, including:
 - freight and delivery providers
 - information technology and data storage providers
 - function and event organisers
 - marketing and communications agencies
 - research and statistical analysis providers
 - debt collectors
 - call centres
 - printing and mail houses (for example, to print and distribute shareholder statements)
 - external business advisers (such as recruitment advisors, accountants, auditors and lawyers)

In each case, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.

Additional information for shareholders

The Corporations Act requires us to include information about our shareholders (including name, address, and details of the securities held) in our public register of shareholders. The information contained in our public register must remain there even if a person ceases to be a shareholder in the company. Information contained in our register is also used to facilitate distribution payments, corporate communications and our compliance with legal and regulatory requirements. The collection and handling of shareholder personal information is also governed by certain rules such as the ASTC Settlement Rules.

6. Cross border disclosure of personal information

We do not currently disclose personal information to third parties located overseas. If this changes at some time in the future, we will comply with the requirements of the Privacy Act that apply to cross border disclosures of personal information and this Privacy Policy will be amended accordingly.

7. Data quality and security

7.1 General

We hold personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists, and in paper files held in drawers and cabinets. We take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, complete, up to date (in the case of use and disclosure) relevant;
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the APPs.

You can help us keep your information up to date, by letting us know about any changes to your details, such as your address, email address or phone number.

7.2 Security

The steps we take to secure the personal information we hold include website protection measures (such as firewalls and anti-virus software), security restrictions on access to our computer systems (such as login and password protection), controlled access to our corporate premises, policies on document storage and security, personnel security (including restricting access to personal information on our systems to staff who need that access to carry out their duties and workplace policies).

Online credit card payment security

We process payments using EFTPOS and online technologies. All transactions processed by us meet industry security standards to ensure payment details are protected.

Website security

While we strive to protect the personal information and privacy of users of our website, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact us by telephone or post (details under heading 10 below).

8. Access and Correction

8.1 General

Please contact us (details under heading 10 below) if you would like to access or correct the personal information that we hold about you. We request that you provide us with as much information as you can about the particular information, in order to help us retrieve it. We may require you to verify your identity before processing any access or correction requests, to make sure that the personal information we hold is properly protected.

8.2 Access

We will generally provide you with access to your personal information, subject to some exceptions permitted by law. We will also generally provide access in the manner that you have requested (eg by providing photocopies or allowing a file to be viewed), provided it is reasonable and practicable for us to do so. We may charge a fee to cover our reasonable costs of locating the information and providing it to you.

8.3 Correction

If you ask us to correct personal information that we hold about you, we will take reasonable steps to correct that information. If we refuse to correct personal information in the manner you have requested, you may ask us to associate your request with the information and we will take reasonable steps to do so.

8.4 Timeframe for access and correction requests

Except in the case of more complicated requests, we will endeavour to respond to access and correction requests within 30 days.

9. Complaints

If you have a complaint about how we have collected or handled your personal information, please contact us (details under heading 10 below).

We will try in the first instance to deal with your complaint and take any steps necessary to resolve the matter within a week. If your complaint can't be resolved at the first instance, we will ask you to submit your complaint in writing.

We will endeavour to acknowledge receipt of your written complaint within 10 business days of receiving it and to complete our investigation into your complaint in a timely manner. This may include, for example, gathering the relevant facts, locating and reviewing relevant documents and speaking to relevant individuals.

In most cases, we expect that complaints will be investigated and a response provided within 30 days of receipt of your written complaint. If the matter is more complex and our investigation may take longer, we will write and let you know, and tell you when we expect to provide our response.

If you are not satisfied with our response, you can refer your complaint to the Office of the Australian Information Commissioner (see [here](#) for further information).



10. Our contact details

Please contact us if you have any queries about the personal information that we hold about you or the way we handle that personal information. Our contact details are set out below.

Mail: Privacy Officer, Saferoads Holdings Limited, PO Box 340
Drouin, Victoria, Australia, 3818

Telephone: + 61 3 5625 6600

Facsimile: +61 3 5625 4986

Further general information about privacy is available on the website of the Office of the Australian Information Commissioner at www.oaic.gov.au or by calling the OAIC's enquiry line at 1300 363 992.

11. Changes to this Policy

We may amend this Privacy Policy from time to time. The current version will be posted on our website and a copy may be obtained by contacting us (details above).