PRIVACY POLICY

PURPOSE OF THE POLICY

This is the Privacy Policy of:

- Australian Metal Processors Pty Ltd T/A Coil Processors - ABN 56 151 692 330
- Australian Rollforming Manufacturers Pty Ltd - ABN 30 160 982 178
- Australian Rollforming Manufacturers Pty Ltd T/A Australian Pipe & Tube - ABN 30 160 982 178
- Boyd Metal Industries Pty Ltd - ABN 45 615 974 279
- Brice Metals Australia Pty Ltd - ABN 21 098 296 201
- Brice Sheet & Coil Pty Ltd - ABN 70 659 504 159
- Eliott Engineering Pty Ltd - ABN 46 600 614 524
- Eliott Engineering Pty Ltd T/A Alliance Laser - ABN 46 600 614 524
- Eliott Engineering Pty Ltd T/A Komo Metform Engineering - ABN 46 600 614 524
- Eliott Engineering Pty Ltd T/A Smithweld Bending - ABN 46 600 614 524
- Ferrocut Australia Pty Ltd - ABN 38 122 123 102
- Piling Solutions Australia Pty Ltd - ABN 90 636 847 302
- RJE Pty Ltd T/A Metal Shop Technics - ABN 43 093 980 673
- RJE Pty Ltd T/A Rigby Jones - ABN 43 093 980 673
- Rollco Pty Ltd - ABN 23 002 155 688
- Rollpress Proplate Group Pty Ltd T/A RPG Australia - ABN 60 160 898 073
- Southern Queensland Steel Pty Ltd T/A Southern Steel QLD - ABN 62 085 107 991
- Southern Sheet & Coil Pty Ltd - ABN 48 003 385 322
- Southern Steel Cash & Carry Pty Ltd - ABN 36 003 897 274
- Southern Steel Group Pty Ltd - ABN 43 003 067 838
- Southern Steel Supplies Pty Ltd - ABN 37 000 060 131
- Southern Steel Trading Pty Ltd - ABN 17 138 204 029
- Southern Steel (WA) Pty Ltd - ABN 64 125 188 409
- Southern Steel (WA) Pty Ltd T/A WA Cutting Services - ABN 64 125 188 409
- Steelpipes Pty Ltd - ABN 41 154 859 006
- Surdex Sheet & Coil Pty Ltd - ABN 43 004 339 922
- Surdex Steel Pty Ltd - ABN 39 004 339 904
- and our related entities

The purpose of this policy is to clearly express an up to date policy about our company's management of personal information.
This policy is intended to enhance the transparency of our company's operations, notify you of your rights and our obligations and provide information regarding:

1. the kinds of personal information which we will collect and hold;
2. how we will collect, hold, use and disclose personal information;
3. the purpose for which we collect, hold, use and disclose personal information;
4. how you may access personal information that is held by us and seek correction of such information;
5. how you may complain about a breach of the Australian Privacy Principles (APP) or registered APP code (if any) that binds us and how we will deal with such complaint;
6. whether we are likely to disclose personal information to overseas recipients;
7. if we are likely to disclose personal information to overseas recipients, the countries in which such recipients are likely to be located and if practical specify the countries in the policy.

This Privacy Policy sets out how we comply with its obligations under the *Privacy Act 1988* (as amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012)* (the Act).

ACKNOWLEDGEMENT

We acknowledge that we must take reasonable steps when handling personal information.

Whilst we cannot warrant that this policy will be followed in every instance we will endeavour to follow this policy on each occasion.

Our company has taken reasonable steps to endeavour to comply with the APPs and the Act. Some examples are noted below.

1. Implementation of privacy policy.
2. Staff training and education (including a handbook for our staff).
3. Use of checklists to ensure that all APPs are complied with.
4. Clear and transparent procedures regarding handling of complaints and disclosure of information.

Our policy is available on our website however should you require a hardcopy please contact us and we will provide you with a copy.

THE KINDS OF PERSONAL INFORMATION WHICH WE WILL COLLECT & HOLD

COLLECTION

It is our usual practice to collect personal information directly from the subject individual or their authorised representative(s).

Personal information means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether or not recorded in a material form, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Some examples of some personal information we might collect are:

1. name;
2. address;
3. contact details such as phone number, email address; and
4. date of birth.

IDENTIFICATION

You may choose to interact with us using a pseudonym and/or not identify yourself.

In circumstances where we are required to do so, or are authorised by law, a court or tribunal to ask for your identification, we will request your personal information.

Further it is likely that it will be impractical for us to interact with you without some form of identification, and therefore we will request identification details from you at the beginning of each transaction.

For example we will not be able to open a commercial credit trading account or process a commercial credit application for you without obtaining identification details.

HOW WE WILL COLLECT & HOLD YOUR PERSONAL INFORMATION

We only collect and hold personal information by lawful and fair means.

In some circumstances, we may collect and hold personal information that has been collected from a third party or publicly available source. This will likely occur in instances where:

1. you have consented for this collection (which would usually be via our privacy statement and/or credit application form); or
2. you would reasonably expect us to collect your personal information in this way and it is necessary for us to collect this information for a specific purpose (such as investigation of a complaint).

We will take steps to hold personal information in a manner which is secure and protected from unauthorised access.

Your information may be held in either a physical form or in electronic form on our IT system.

We will take steps to protect the information against the modification, disclosure or misuse by including such things as physical restrictions and password protection for accessing electronic IT systems.

We will also endeavour to ensure that our service providers have protection for electronic IT systems and other necessary restrictions.

We will endeavour to ensure our staff are trained with respect to the security of the personal information we hold and we will restrict any access where necessary.

We will endeavour to destroy and de-identify the personal information once it is no longer required.

In the event we hold personal information that is unsolicited and we were not permitted to collect it, the personal information will be destroyed as soon as practicable.

If we collect personal information about you from someone else, we will advise you as soon as practicable that this information has been collected and the circumstances which surround the collection.

THE PURPOSE FOR WHICH WE COLLECT & HOLD PERSONAL INFORMATION

We will endeavour to only collect and hold personal information which is relevant to the operation of our company.

Our purpose for collecting or holding personal information about you is so that it may be used directly for our functions or activities.

We may use your personal information for the functions or activities of our company to:

1. assess credit applications;
2. review existing credit terms;
3. assess credit worthiness;
4. collect overdue payments;
5. assess credit guarantees (current and prospective);
6. internal management purposes;
7. marketing;
8. sales;
9. business development purposes and direct marketing.

We may also collect personal information (including sensitive information) for both the primary purposes specified herein and purposes other than the primary purposes, including the purpose of direct marketing.

We may also collect personal information from other credit providers, Credit Reporting Bodies (CRB) and any other third parties for the purposes of our functions and activities including, but not limited to, credit, sales, marketing and administration.

THE PURPOSE FOR WHICH WE USE & DISCLOSE PERSONAL INFORMATION

We will endeavour to only use and disclose personal information for the primary purposes noted above in relation to the functions or activities of our company.

In addition we may also use and disclose personal information (including sensitive information) for both the primary purposes specified herein and purposes other than the primary purposes, including the purpose of direct marketing.

Unless one or more of the below scenarios has occurred, we will take necessary steps to prevent personal information from being given to government agencies or other organisations.

1. You have provided your consent.
2. You would reasonably expect that your information would be so disclosed.
3. We have informed you that that your personal information will be provided to a third party.
4. We are required by law to provide your personal information to a government agency or other organisation.
5. The disclosure of the information will prevent a serious threat to somebody's life or health.
6. The disclosure of the information is reasonably necessary for the enforcement of criminal law.

Further we will endeavour to only disclose personal information for the purpose in which it was collected, unless disclosure is reasonably necessary to:

1. assist in locating a missing person;
2. lessen or prevent a serious threat to life, health or safety;
3. take appropriate action with suspected unlawful activity or serious misconduct;
4. facilitate or assist with diplomatic or consular functions or activities;
5. assist certain defence force activities outside Australia;
6. establish or exercise a defined legal or equitable claim; or
7. facilitate or assist confidential alternative dispute resolution activities.

We will take steps not to disclose personal information for direct marketing purposes unless consent has been provided.

In any event you will be provided with an opt out option with respect to direct marketing should you wish to be excluded from direct marketing.

We will record this information on our opt out register.

We will endeavour not to use or disclose a government related identifier unless:

1. the use or disclosure of the identifier is reasonably necessary for us to verify your identity for the purposes of our activities or functions; or
2. the use or disclosure of the identifier is reasonably necessary for us to fulfil our obligations to an agency or a State or Territory authority; or
3. the use or disclosure of the identifier is required or authorised by or under an Australian law or a court/tribunal order; or
4. a permitted general situation (as that term is defined in the Act) exists in relation to the use or disclosure of the identifier; or
5. we reasonably believe that the use or disclosure of the identifier is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

DISCLOSURE TO CRB'S

We may disclose personal information to a CRB in accordance with the permitted disclosures as defined under the Act.

We may disclose your Credit Information to the following CRB's listed below:

- Illion
  479 St Kilda Rd
  Melbourne VIC 3004
  Tel: 13 23 33
- CreditorWatch
  Level 13, 109 Pitt St
  Sydney NSW 2000
  Tel: 1300 501 312
- NCI
  Level 2, 165 Grenfell St
  Adelaide SA 5000
  Tel: 1800 882 820
- Equifax Australia
  Level 15, 100 Arthur St
  North Sydney NSW 2060
  Tel: 1300 921 621
- Experian
  Level 6, 549 St Kilda Rd
  Melbourne VIC 3004
  Tel: 03 9699 0100

A copy of the credit reporting policy for the CRB's listed above will be available on their website or will be provided in hard copy upon request.

HOW YOU MAY ACCESS YOUR PERSONAL INFORMATION

You are entitled to access your personal information held in our possession.

We will endeavour to respond to your request for personal information within a reasonable time period or as soon as practicable in a manner as requested by you. We will normally respond within 30 days.

You can make a request for access by sending an email or letter addressed to our Privacy Officer, details specified below.

- The Privacy Officer
  Southern Steel Group Pty Ltd
  319 Horsley Road Milperra NSW 2214
  Tel: 02 9792 2099
  Fax: 02 9774 2504
  Email: privacyofficer@southernsteel.com.au

With any request that is made we will need to authenticate your identity to ensure the correct person is requesting the information.

We will not charge you for making the request, however if reasonable we may charge you with the costs associated with your request.

You will only be granted access to your personal information where we are permitted or required by law to grant access. We are unable to provide you with access that is unlawful.

Further we are not required to and will not give access to personal information to the extent that:

1. we reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
2. giving access would have an unreasonable impact on the privacy of other individuals; or
3. the request for access is frivolous or vexatious; or
4. the information relates to existing or anticipated legal proceedings and the information would not be accessible in normal discovery procedures; or
5. giving access would reveal the intentions of us in relation to negotiations and this disclosure would prejudice those negotiations; or
6. denying access is required or authorised by or under an Australian law or a court/tribunal order; or

7. we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, or may be engaged in; or
8. giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
9. giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
10. giving access would reveal evaluative information generated within us in connection with a commercially sensitive decision-making process.

If we refuse access to the information, written notice will be provided to you setting out:

1. the reasons for the refusal (except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so); and
2. the mechanisms available to complain about the refusal; and
3. any other matter prescribed by the regulations.

CORRECTION

Should we hold personal information and it is inaccurate, out of date, incomplete, irrelevant or misleading, or incorrect you have the right to make us aware of this fact and request that it be corrected.

If you would like to make a request to correct your information please contact our Privacy Officer on the details above.

In assessing your request we need to be satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading. We will then take all reasonable steps to ensure that it is accurate, up to date, complete and not misleading.

It is our normal policy to resolve any correction requests within 30 days. If we require further time we will notify you in writing and seek your consent.

Should we refuse to correct your personal information written notice will be provided to you setting out:

1. the reasons for the refusal (except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so); and
2. the mechanisms available to complain about the refusal; and
3. any other matter prescribed by the regulations.

We will endeavour to notify any relevant third parties of the correct personal information where necessary and required.

COMPLAINTS

In the event that you wish to make a complaint about a failure of us to comply with our obligations in relation to the Act or the APP's please raise this with our Privacy Officer on the details above.

We will provide you with a receipt of acknowledgment as soon as practicable.

We will then endeavour to respond to your complaint and attempt to resolve the issues within 30 days.

In dealing with your complaint we may need to consult another credit provider or third party.

DISCLOSURE TO OVERSEAS RECIPIENTS

We may choose to, if permitted by law, share and/or disclose your personal information with recipients outside of Australia.

We are required to notify you with a list of any countries which personal information may be transmitted to, or disclosed where it is practical for us to do so.

At this point in time, we do not share and/or disclose any personal information to overseas recipients.

If you have any queries regarding any of our privacy policies or wish to find out more regarding any of our privacy policies, please contact our Privacy Officer on the details above.