

Privacy Policy for EU General Data Protection Regulation

Karndean International Pty Ltd (“Karndean”)

Our primary privacy obligations are derived from Australian law. Sometimes, we will also handle the data of EU Citizens or share data with other organisations which do so or provide services to individuals located in the EU. To the extent that we do so, this Privacy Policy for EU General Data Protection Regulation applies.

Your privacy is important to us. This Privacy Policy explains how we handle and treat your data when you (i) register or visit our site, (the "Site") or (ii) engage with us to use the products or services that Karndean provides (our "Services"). It also includes information about individuals whose personal information we may process as a result of providing the Services to third parties and individuals who apply to work at Karndean.

1. Purpose of this Policy

This Privacy Policy ("Privacy Policy") explains our approach to any personal information that we collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. It also sets out your rights in respect of our processing of your personal information.

This Privacy Policy will inform you of the nature of your personal information that is processed by us and how you can request that we delete, update, transfer and/or provide you with access to it.

This Privacy Policy is intended to assist you in making informed decisions when using the Site and our Services and/or to understand how your personal information may be processed by us as a result of providing the Services to third parties or when you apply to work at Karndean. Please take a moment to read and understand it.

Please also note that this Privacy Policy only applies to the use of your personal information obtained by us.

2. Who are we and what do we do

Karndean is dedicated to manufacturing, marketing and supplying creative design flooring to a worldwide base of interior designers, architects, specifiers and flooring contractors for use in commercial and domestic environments. Karndean is the data controller responsible for your personal information processed via the Site.

3. How to contact us

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by:

- sending an email to: privacy@karndean.com.au

- calling us on: 1800 331 170

4. What personal information do we collect

We may collect personal information from you in the course of our operation, including through your use of our Site, when you contact or request information from us, when you engage with us or as a result of your relationship with one or more of our staff or clients.

Our primary goal in collecting personal information from you is to help us:

- verify your identity;
- deliver our Services;
- improve, develop and market new Services;
- carry out requests made by you on the Site or in relation to our Services;
- comply with any applicable law, court order, other judicial process, or the requirements of a regulator;
- enforce our agreements with you;
- protect the rights, property or safety of us or third parties, including other users of the Site or our Services;
- with recruitment purposes, and
- use as otherwise required or permitted by law.

To undertake these goals we may process the following personal information:

- If you are a visitor to the Site:
 - Name and job title.
 - Contact information including the company you work for, email address and social media account where appropriate.
 - Demographic information such as your address, preferences and interests.
 - Other information relevant to the provision of Services.
- If you are an individual client in receipt of our Services or prospective individual client:
 - Name and job title.
 - Contact information including the company you work for and email address, where provided.
 - Payment information.

- Information that you provide to us as part of us providing the Services to you, which depends on the nature of your instructions to Karndean.
- Information you provide to us for the purposes of attending meetings and events, including dietary requirements which may reveal information about your health or religious beliefs.
- Other information relevant to provision of Services.

Even if you are not an individual and are dealing with us on behalf of an organisation, as part of such instructions personal information may be provided to us.

If you are an individual whose personal information is processed by us as a result of providing the Services to others, we will process a variety of different personal information depending on the Services provided.

We might also need to process personal information in relation to other third parties instructed either by our own clients or other persons or companies involved with us providing the Services to our client (for instance other industry experts).

For clients and prospects, we also collect information to enable us to market our products and Services which may be of interest to you. For this purpose we collect:

- Name and contact details.
- Other business information such as job title and the company you work or worked for.
- Areas or topics that interest you.
- Additional information may be collected such as events you attend and if you provide it to us, dietary preferences which may indicate data about your health or religious beliefs.

If you are a potential recruit to join Karndean:

- Name and job title.
- Contact information including email address.
- Curriculum vitae, including your age and/or gender if you provide it to us, your education, employment history and similar matters and similar information that you may provide to us.
- Other information relevant to potential recruitment to Karndean.

5. How do we use your personal information

We may use your information for the following purposes:

- Fulfilment of Services

We collect and maintain personal information that you voluntarily submit to us during your use of the Site and/or our Services to enable us to perform the Services.

What is our legal basis?

It is necessary for us to process your information to perform our obligations in accordance with any contract that we may have with you. It is in our legitimate interest or a third party's legitimate interest to use your personal information in such a way to ensure that we provide the very best client service we can to you or others.

- Recruitment

We use your personal information for the following recruitment purposes:

To assess your suitability for any position for which you may apply at Karndean, including volunteer and committee positions.

What is our legal basis?

Where we use your personal information in connection with recruitment it will be in connection with us taking steps at your request to enter a contract we may have with you or it is in our legitimate interest to use personal information in such a way to ensure that we can make the best recruitment decisions for Karndean. We will not process any special category data except where we are able to do so under applicable legislation or with your explicit consent.

- Marketing communications

We carry out the following marketing activities using your personal information:

- Postal marketing
- Email marketing

We use information that we observe about you from your interactions with our Site, our email communications to you and/or with Services to send you marketing communications.

What is our legal basis?

It is in our legitimate interest to use your personal information for marketing purposes.

We will only send you marketing communications where you have consented to receive such marketing communications, or where we have a lawful right to do so.

- Client insight and analysis

We analyse your contact details with other personal information that we observe about you from your interactions with our Site, our email communications to you and/or with our Services such as the Services you have viewed.

Where you have given your consent (where lawfully required), we use cookies, log files and other technologies to collect personal information from the computer hardware and software you use to access the Site, or from your mobile. This includes the following:

- an IP address to monitor Site traffic and volume;
- a session ID to track usage statistics on our Site;
- information regarding your personal or professional interests, demographics, experiences with our products and contact preferences.

Our web pages contain "cookies" "web beacons" or "pixel tags" ("Tags"). Tags allow us to track receipt of an email to you, to count users that have visited a web page or opened an email and collect other types of aggregate information. Once you click on an email that contains a Tag, your contact information may subsequently be cross-referenced to the source email and the relevant Tag.

In some of our email messages, we use a "click-through URL" linked to certain website administered by us or on our behalf.

By using this information, we are able to measure the effectiveness of our content and how visitors use our Site and our Services. This allows us to learn what pages of our Site are most attractive to our visitors, which parts of our Site are the most interesting and what kind of offers our registered users like to see.

We also use this information for marketing purposes (see the marketing section above for further details).

What is our legal basis?

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best products and services to you and our other clients.

Any other purposes for which we wish to use your personal information that are not listed above, or any other changes we propose to make to the existing purposes will be notified to you using your contact details, where available.

6. What is our legal basis to use or process your personal information

It is necessary for us to use your personal information:

- To perform our obligations in accordance with any contract that we may have with you.
- It is in our legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we provide the Services in the best way that we can.
- It is our legal obligation to use your personal information to comply with any legal obligations imposed upon us.

7. Who do we share your personal information with

We may also share personal information with a variety of the following categories of third parties as necessary:

- Our professional advisers such as lawyers and accountants.
- Government or regulatory authorities.
- Professional indemnity or other relevant insurers.
- Regulators/tax authorities/corporate registries.
- Third parties to whom we outsource certain services
- Third party postal or courier providers who assist us in delivering our postal marketing campaigns to you, or delivering documents related to a matter.

8. Our use of cookies and similar technologies

Our Site use certain Tags, log files and other technologies of which you should be aware.

9. Third party contractors and other controllers

As mentioned above, we may appoint sub-contractor data processors as required to deliver the Services, such as, without limitation, document processing and translation services, confidential waste disposal, IT systems or software providers, IT Support service providers, document and information storage providers, who will process personal information on our behalf and at our direction. We conduct an appropriate level of due diligence and put in place contractual documentation in relation to any sub-contractor to ensure that they process personal information appropriately and according to our legal and regulatory obligations.

What is our legal basis?

It is necessary for us to perform our obligations in accordance with any contract that we may have with you.

It is in our legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we provide the Services in the best way that we can.

10. Where do we transfer your data to

In order to provide the Services we may need to transfer your personal information to locations outside the jurisdiction in which you provide it.

If you are based within the European Economic Area (EEA), please note that where necessary to deliver the Services we will transfer personal information to countries outside the EEA.

11. How long do we keep your personal information for

For visitors to the Site, we will retain relevant personal information as required by Australian law.

If personal information is only useful for a short period e.g. for specific marketing campaigns we may delete it.

12. Confidentiality and the security of your personal information

We are committed to keeping the personal information provided to us secure and we have implemented appropriate information security policies, rules and technical measures to protect the personal information that we have under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss.

All of our partners, employees, consultants, workers and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of such personal information.

13. How to access your information and your other rights

You have the following rights in relation to the personal information we hold about you:

- Your right of access

If you ask us, we'll confirm whether we're processing your personal information and, if necessary, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

- Your right to rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to erasure

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to restrict processing

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to such use. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the

restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to data portability

You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

- Your right to object

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
 - processing your personal information for direct marketing purposes.
- Your right to withdraw consent

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

- Your right to lodge a complaint with the supervisory authority

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the Office of the Australian Information Commissioner.

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure.

14. Collection of information by third-party sites and sponsors

The Site contains links to other sites whose information practices may be different than ours. Visitors should consult the other sites' privacy notices.

15. Changes to this Privacy Policy

We may make changes to this Privacy Policy from time to time. To ensure that you are always aware of how we use your personal information we will update this Privacy Policy from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. Where it is practicable, we will notify you by email of any significant changes. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.