

1. Purpose

This Privacy Policy outlines how Swagelok Australia & New Zealand (referred to as "we", "us", or "our") manages personal information collected through our sales and service functions, in accordance with the:

- Australian Privacy Principles (APPs) under the Privacy Act 1988 and applicable provisions of the APRA Prudential Standard CPS 234 on Information Security and
- New Zealand Privacy Act 2020 and its 13 Information Privacy Principles (IPPs)

2. Scope

This policy applies to all personal information collected by our Sales, Customer Service, Technical Support, and Field Services teams, whether in physical or digital form in both Australia and New Zealand.

3. Our Commitment to Privacy

We are committed to protecting the personal information of our customers, business partners, and service users. We collect, use, store, and disclose personal information in a manner consistent with the 13 Australian Privacy Principles (APPs) and CPS 234 requirements and New Zealand Privacy Act 2020 and its 13 Information Privacy Principles (IPPs)

4. Personal Information We Collect (APP 1, 3, 5 & IPP 4)

We may collect the following types of personal information in the course of providing sales and services:

- Full name and contact details (email, phone, address)
- Company and job title
- Purchase history and service interactions
- Technical inquiries or support tickets
- Survey or feedback responses
- Financial and payment information (as needed)

We collect personal information directly from individuals, and, where applicable, from authorised third parties.

5. Why We Collect Personal Information (APP 6 & IPP 3)

We use the collected information to:

- Process product orders and service requests
- Provide technical support and troubleshooting
- Manage customer accounts and communications
- Conduct service follow-ups and satisfaction surveys
- Conduct marketing of products and/or services
- Improve our offerings and ensure compliance with legal and regulatory obligations

6. Use and Disclosure of Personal Information (APP 6, 8 & IPP 3)

We do not sell or rent personal information. We may share information with:

- Authorised third-party service providers (e.g. logistics, IT support)
- Regulatory bodies, if required under law or industry regulation
- Overseas service providers in limited circumstances, where protections are consistent with the APPs & IPP

7. Storage and Security of Personal Information (APP 11, CPS 234 & IPP 5)

We take all reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. Measures include:

- Role-based access controls
- Encryption of sensitive data
- Secure backups and secure disposal
- Regular information security audits
- Compliance with CPS 234 & IPP 5: ensuring that information assets are resilient to cyber threats

Clients

- Client contact and client details;
- Information regarding products and services the client offers;
- Information regarding how the client interacts with Swagelok;
- Previous dealings with the client, which may include meeting notes and information obtained through the provision of products and services, and
- Contact names of individual staff of the client obtained through dealings.

Potential/Existing Employees

- Candidate information submitted and obtained from the candidate and other sources in connection with applications for employment;
- Employment performance information;
- Employee information e.g. home address and contact details, sex, date of birth;
- Information about incidents in the workplace;
- Information obtained to assist in managing client and business relationships, and
- Information documenting the work history of these workplace participants (such as their letter of appointment and bank account details as well as records of any salary adjustments)

8. Integrity and Accuracy of Information (APP 10 & IPP 8)

We take reasonable steps to ensure the personal information we collect is accurate, complete, and up to date. Individuals can contact us to update their information.

9. Access and Correction (APP 12 & 13 & IPP 6, 7 & 8)

You may request access to your personal information, or request corrections if it is inaccurate. Requests should be made in writing to the Privacy Officer at the contact details below.

10. Anonymity and Pseudonymity (APP 2)

Where practical and lawful, we will provide individuals the option of not identifying themselves or using a pseudonym.

11. Direct Marketing (APP 7)

We may use your information to send you relevant product or service updates, event invitations, or training offers. You can opt out of receiving marketing at any time.

12. Cross-border Disclosure (APP 8 & IPP 12)

If personal information is disclosed outside Australia or New Zealand, we take reasonable steps to ensure that the overseas recipient complies with the APPs or equivalent privacy standards.

13. Complaints and Privacy Contact

If you believe we have breached your privacy, you can lodge a complaint with our Managing Director. We will investigate the issue and respond within a reasonable timeframe.

Privacy Officer

Swagelok Australia and New Zealand

Email: kevin.hurrel@swagelok.com.au

You may also contact the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au if you are not satisfied with our response.

14. Updates to This Policy

This policy may be updated from time to time to reflect changes in legal, technological, or business requirements. The latest version will be published on our website.

Resources & Legislation:

Australia:

<https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-guidelines>

New Zealand:

<https://www.privacy.org.nz/privacy-principles/>