

PRIVACY POLICY

This is the Privacy Policy of **C & M Associates Pty Ltd trading as Pinnacle Paint Supplies ABN 73 614 686 430 (Pinnacle)**.

Protecting your privacy is important to Pinnacle. We are committed to maintaining the security of all Personal Information provided to Pinnacle, whether by individuals with whom we do business, visitors to and users of our websites or otherwise. This Privacy Policy details how we collect, use, and manage this Personal Information.

Pinnacle has appointed a Privacy Officer who will ensure that our activities are carried out in compliance with applicable laws. For questions regarding this Policy, to exercise your rights or to lodge a complaint with us, please contact our Privacy Officer at privacy@pinnacle.com.au.

For the purposes of this Privacy Policy and applicable data protection and privacy laws:

- **Personal Information** is defined as information and data, whether recorded in a material form or not, relating to an identified or identifiable natural person that is processed by or on behalf of Pinnacle, whether by automated means; and
- Pinnacle is considered the “data controller” in respect of the Personal Information that it collects, uses, and manages in connection with this Privacy Policy.

Whose information do we collect?

Pinnacle collects Personal Information from a range of individuals in the context of its business activities, including:

- representatives of our suppliers, customers, and business partners;
- contractors;
- landowners;
- industry association representatives;
- users of Pinnacle websites; and
- job applicants.

What information we collect and why we collect it

We collect Personal Information from you where it is relevant for our purposes as further detailed below.

Business use

Pinnacle may collect a range of information in a business context, such as your name, gender, job title, photographic identification, email address, home address and other contact details, details of your business and other interests, experience and/or academic and professional qualifications, third party references, communications with you (including notes from meetings and telephone call recordings), feedback or survey responses that you provide to us, financial and payment information, and information collected from questionnaires and/or interviews.

Pinnacle uses information collected from you for business-related purposes, including negotiating, concluding and performing contracts, managing business relationships, administering real estate leases and licences, recruitment, managing accounts and records, communicating with you and third-party contacts, supporting corporate social responsibility activities, security, legal, regulatory and internal investigations and debt administration.

Our websites

When you use our websites, Pinnacle collects certain standard information that is sent by your browser to our website. This includes technical information, such as your IP address, browser type, operating system, language, time zone setting, access times, and any referring website addresses.

Pinnacle uses this information to administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. Pinnacle also collects certain information to provide users with a personalised experience when visiting our websites. Through the use of a 'cookie', Pinnacle can record information about your visit to our website including the clickstream to, through and from our site (including date and time), the pages visited, page interaction information and methods used to browse away from the page. This information is used anonymously and in aggregate and is collected and logged for statistical purposes. Through analysis of these records, Pinnacle can provide an improved service when users revisit our websites. See below for further information on our use of cookies and related technologies.

Other than as stated in this Privacy Policy, no attempt is made to identify our users of our websites or their browsing activities except:

- where a law enforcement agency exercises a warrant to inspect logs or any such information is otherwise required to be produced by Pinnacle to authorities or regulators; or
- where Pinnacle believes it is required to collect and produce relevant electronic documentation to fulfil its obligations to third parties, including statutory organisations under local law.

Access to other websites via hyperlink

Other websites that may be accessible via hyperlinks from Pinnacle websites are owned and operated by third parties and are not subject to Pinnacle's Privacy Policy. Pinnacle has no control over the content of those websites. Please review the privacy policy of each individual website you access and assess whether the policy is satisfactory to you before you use the other websites.

Cookies & Related Technologies

Our websites and mobile applications ("apps") use cookies. A cookie is a small text file that is placed on your computer or mobile device when you visit a website or use an app. Cookies collect information about users and their visit to the website or use of the app, such as their Internet protocol (IP) address, how they arrived at the website (for example, through a search engine or a link from another website) and how they navigate within the website or app. A cookie cannot read data from your hard disk or read cookie files created by other websites.

Pinnacle uses cookies and other technologies to facilitate your internet sessions and use of our apps, offer you services according to your preferred settings, track use of our websites and apps and to compile statistics about activities carried out on our web sites and/or through our apps.

You may set up your web browser to block cookies or remove cookies stored from your computer or mobile device. However, if you do so, you may not be able to use certain features and functions of our websites and apps.

Providing Personal Information

At times, Pinnacle may ask you to voluntarily supply Personal Information, such as your name, email address, location, telephone number, and preferred means of communication, for purposes such as subscribing to Pinnacle news alerts, direct marketing or requesting further information from Pinnacle.

Where we ask you to voluntarily supply Personal Information, we will use it to provide you with the information or services that you have requested from us.

Job Applicants' Personal Information

When you submit a job application to Pinnacle, or to a recruitment agent or advisor engaged to administer our employment marketing initiatives and/or the recruitment/engagement process, we will collect more specific Personal Information about you, such as your name, email address and telephone number, qualifications and career history. We may also ask you for other information, such as information on your interests and the types of jobs in which you are interested. We may also collect your Personal Information from publicly available sources (such as Facebook and LinkedIn); and from third parties (such as references, psychometric test results, and police checks). The Personal Information you provide to Pinnacle in, and in connection with, your job application, and the further information which we collect will only be processed for the purpose of considering employment or internship positions at Pinnacle.

If any job application you make is unsuccessful, Pinnacle may choose to retain your Personal Information for a period of up to 12 months for the purposes of considering you for other roles within Pinnacle. Pinnacle is under no obligation to retain your Personal Information for this purpose and may elect to delete your Personal Information at any time following an unsuccessful application. You may also request that Pinnacle deletes your Personal Information if you do not wish to be considered for further roles. You can do this by informing Pinnacle when you submit your job application, or at any time after applying, by emailing us at privacy@pinnacle.com.au.

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Unit 3/30 Elizabeth St, Wetherill Park, NSW 2164

Branch: (02) 8970 6119

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Sensitive Personal Information

Sensitive Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health or medical conditions, genetic or biometric information, sexual orientation, or criminal convictions and offences may be processed by Pinnacle if such processing is necessary to comply with laws and regulations or where you provide this information voluntarily or otherwise consent for us to do so.

Email monitoring

Pinnacle may monitor emails sent to and from its workforce, which may contain Personal Information relating to third parties. The information contained in such emails may be used for business-related purposes, for example when investigating incidents within Pinnacle. Although Pinnacle endeavours not to review the contents of personal emails, there may be occasions when this is necessary, for example, to investigate a breach of security within Pinnacle, or in the context of legal proceedings.

The legal basis for Pinnacle processing your Personal Information

To comply with applicable data protection and privacy laws, Pinnacle is required to set out the legal basis for the processing of your Personal Information. In accordance with the purposes for which we collect and use your Personal Information, as set out above, the legal basis for Pinnacle processing your Personal Information will typically be one of the following:

- your consent;
- the performance of a contract that we have in place with you or other individuals;
- Pinnacle's or our business partners' legitimate business interests; or
- compliance with our legal obligations.

Disclosure of the information we collect

Pinnacle may share your Personal Information with people within Pinnacle who need to know that information for business or legal reasons, for example, in order to carry out an administrative function such as processing an invoice, or to direct a query that you have submitted to the relevant department within Pinnacle.

We may disclose your Personal Information to third parties including the authorities, Pinnacle's advisors, suppliers of IT services and third parties engaged by Pinnacle for the purpose of providing services requested by you; to protect any intellectual property rights in any materials displayed on or otherwise available from Pinnacle's websites; for the purposes of seeking legal or other professional advice; to respond to a legal request or comply with a legal obligation; and to enforce Pinnacle's trading terms.

We may disclose your Personal Information to third parties if we sell, buy, or merge any business or assets, including to the prospective seller or buyer of such business or assets. Pinnacle may also disclose the Personal Information you provide to us in connection with the job recruitment process to Pinnacle HR practitioners and to Pinnacle's recruitment advisors for the purpose of considering you for career opportunities with Pinnacle.

Transfer of your Personal Information to other countries

Please note that any person to whom Pinnacle may disclose your Personal Information under this Privacy Policy may be situated in a country other than your own and that such country may provide a lower level of data protection requirements than your own country. By agreeing to this Privacy Policy, you consent to the transfer of your Personal Information to a country other than your own.

Whenever we transfer Personal Information across borders, we take steps to put in place adequate safeguards to protect your Personal Information and to make sure it is treated in accordance with this Privacy Policy.

Access to Pinnacle's Webstore and eBusiness websites

Access to Pinnacle's Webstore or other eBusiness websites or portals may be provided to Pinnacle's customers to conduct ecommerce transactions or for supplier management purposes. Users of Pinnacle's Webstore or eBusiness websites or

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portals may be required to register with the customer database by providing their email address; their name, company name, office name; their business address, business phone; and a valid Pinnacle internal contact name.

Pinnacle will collect details in the customer database that are relevant to the use of the Webstore or eBusiness websites. While Pinnacle will use the registration details for demographic analysis and to personalise your web experience, Pinnacle will not make customer details available to external parties.

Retention of Personal Information

Pinnacle's aim is to keep your Personal Information for no longer than is necessary for regulatory or Pinnacle's business reasons. The amount of time for which records are kept varies depending upon the type of Personal Information they contain.

Your rights in relation to your Personal Information

If you would like to access or obtain a copy (which may be in machine-readable form) of the Personal Information Pinnacle holds about you, please email your request to privacy@pinnacle.com.au.

Pinnacle endeavours to ensure that the Personal Information it holds about you is complete, accurate, and up to date. If you consider that your Personal Information is incomplete, inaccurate, or out of date, you have the right to require us to correct it. To correct, erase or limit the processing of any of the Personal Information we hold about you, please email your request to privacy@pinnacle.com.au.

If you do not provide us with the information sought in the required fields, we may be limited in our ability to provide you with services.

Complaints and Concerns

If you have a concern or complaint about how Pinnacle has used your Personal Information, as a first step, you should raise this in writing with Pinnacle, via email to privacy@pinnacle.com.au.

If you are not satisfied with the handling of your concern or complaint by Pinnacle, you can escalate this to the Australian Information Commissioner (www.oaic.gov.au) if you are in Australia.

Changes to this Privacy Policy

This Privacy Policy is effective from 1 September 2020. Any changes Pinnacle may make to this Privacy Policy in the future will be posted on this page and will apply to all your Personal Information held by us at that time.

Contact

Questions, comments, and requests regarding this Privacy Policy are welcomed and should be submitted via email to privacy@pinnaclepaintsupplies.com.au.

Effective 1 September 2020

Privacy Policy PIN Final 28jul20