



## HMG Hardchrome PRIVACY POLICY

This Privacy Policy applies to the collection, use, disclosure and handling of personal information by the HMG Hardchrome group (see below) (collectively “HMG”, “we” or “us”), including personal information collected via our website at <https://www.hmg.net.au/> (the “Website”).

HMG is committed to protecting the privacy of individuals and is bound by the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (“**Privacy Act**”). This Privacy Policy outlines how we will collect, use, disclose and otherwise handle personal information.

### About us

When we refer to “HMG” in this Privacy Policy, we are referring to HMG Hardchrome Pty Ltd ABN 47 009 695 309 and its related entities within Australia (including Sime Darby Industrial Australia Pty Ltd ABN 56 153 652 594, Haynes Mechanical Pty Ltd ABN 49 066 059 541 and TFP Engineering Pty Ltd ABN 30 097 216 932 and their subsidiaries). We also have related bodies corporate located overseas and with which we share personal information. These related entities including in the USA and Canada.

This Privacy Policy applies to HMG and its privacy practices in Australia.

### Collection of personal information

HMG collects personal information from you in a number of different ways. We may collect personal information directly from you or in the course of our dealings with you, such as when you call us, fill out a form, provide personal information to us, order our products or services, visit one of our locations, use our Website or apply for a job with us. If we have extended a credit facility to you, we will also collect information internally about your payment performance.

We may also collect personal information about you from publicly available sources, or in some cases, from third parties, recruitment agencies, online plant and equipment hirers, auction houses and market research and communications companies.

The types of personal information that we collect and hold about you will depend on your interaction with us. Generally, we will collect and hold your name, contact details and information relating to your dealings with us. But we may also collect additional personal information from you if you:

- a. use our Website – we will also collect your Internet Protocol (IP) address or Unique Device Identifier and other details about your usage of our Website;
- b. apply to work with us – please see section 5 below ([Job applicants](#));
- c. are an HMG customer – we will collect and hold your name, company, phone number, email and postal addresses; or
- d. apply for credit (or if a company of which you are a director applies for credit, or if you propose to guarantee credit applied for by another person) – we will collect and hold your name, company, postal and email addresses, mobile phone number, date of birth, bank account details and driver’s licence number. We will also collect information contained in credit reports obtained from credit reporting bodies, which includes information about your credit history with other credit providers. We will also collect and hold scores, ratings, summaries, evaluations and other information about your credit worthiness which is derived by us or by credit reporting bodies wholly or partly from any of such information.

The purposes for which we collect your personal information may include:



- a. verifying your identity;
- b. contacting you (including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner);
- c. providing you with our products or services;
- d. assessing and processing your credit application or your application to guarantee credit applied for by another person;
- e. assessing and progressing (if appropriate) your job application;
- f. developing and improving our goods and services and obtaining feedback; and
- g. for advertising, marketing and lead generation.

If we are not able to collect personal information about you, we may not be able to provide you with products, services and assistance to the extent that they require us to collect, use or disclose personal information.

### **Use and disclosure of personal information**

We may hold, use and disclose your personal information so that we can:

- a. respond to your enquiry and provide you with any products and services you may have requested;
- b. contact you (including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner) in relation to your enquiry;
- c. send you our HMG business magazine (if you are our customer);
- d. respond to your feedback or complaint;
- e. assess and process your credit or guarantee application, administer your credit account (including reviews of credit limits, ordering behaviours and patterns, managing defaults and collecting payments), participate in the credit reporting system (including providing information to credit reporting bodies) and continually review and assess your credit worthiness;
- f. derive scores, ratings, summaries and evaluations relating to your credit worthiness (which are used in our decision-making processes and ongoing reviews);
- g. administer, investigate, report and resolve any insurance or other claims, complaints or incidents;
- h. assess and process your employment application, including conducting reference checks;
- i. carry out our business functions and activities, including meeting our legal and regulatory obligations; and
- j. improve the service we provide and also to let you know about promotions, discounts, upcoming events or products or services that may be of interest to you.

Some credit information may only be used or disclosed under the Privacy Act for some of the above purposes or in some circumstances.

We may hold and use your personal information for the purposes for which it was collected. We will also hold and use your personal information for a secondary purpose that is related to a purpose for which we collected it, where you would reasonably expect us to use or disclose your personal information for that secondary purpose.



We may also share your personal information within the HMG group (see “[About us](#)”) and with third parties, including:

- a. third parties for marketing and promotional purposes;
- b. third party service providers we use in conducting our business (including archival, auditing, debt collection, banking, insurance, marketing, advertising, mailhouse, delivery, recruitment, customer contact, technology, data processing, research, investigation, utility, professional advisory (legal, accounting, financial and business consulting) and security services);
- c. if you apply to work with us (see section 5 below (Job applicants)); and
- d. if you apply for credit (or a company of which you are a director applies for credit, or you propose to guarantee credit applied for by another person), we will collect from your personal information and disclose your personal information (and other information you provide in connection with your credit application) to other credit providers, trade referees and credit rating service providers.

Some of the third parties to whom we disclose your personal information may be located outside Australia. See below at “[Overseas disclosures](#)”.

### **Job applicants**

If you apply to work with us, we collect the details that you include in your application and during any interview process with us, as well as from your referees, our recruitment agencies and from public sources. We may also ask you to provide us with additional personal information (including as part of a criminal history check and drug and alcohol testing, as required by our pre-employment screening policy), subject to our legal obligations.

We may disclose your personal information to and/or collect your personal information from our related bodies corporate and our service providers who help us with the recruitment process. This includes recruitment agencies and service providers who perform pre-employment screening and testing services for us.

We will not use this information for any purposes other than assessing and progressing (if applicable) your employment application.

### **Credit applications and credit reporting bodies**

If you, or company of which you are director, apply to us for credit, we may obtain a credit report about you from a credit reporting body. We may also obtain a credit report about you (when the Privacy Act permits us to do so) if you have guaranteed, or have offered to guarantee, an application for a credit facility for a company or someone else.

When we request a credit report from a credit reporting body, we will provide information to the credit reporting body that identifies you, and we may give them information about the type and amount of credit applied for or provided to you (or your company).

### **Information about our marketing practices.**

We may contact you via email, post or other means in order to provide you with updated information about the products or services you have ordered from us and to provide you with other information about our products and services and those of our suppliers (including Caterpillar Inc.). If you do not wish to receive marketing emails from us, you can unsubscribe using the link contained in our emails, otherwise you can contact us using the details set out below.

### **Our Website**



When you visit our Website, our web measurement tools (including Google Analytics) and Internet Service Providers record anonymous information for statistical purposes only, including:

- a. the type of browser, computer platform and screen resolution you are using;
- b. your traffic patterns through our site such as:
  - i. the date and time of your visit to the site;
  - ii. the pages you accessed and documents downloaded; and
  - iii. the previous page you visited prior to accessing our site; and
- c. the Internet address of the server accessing our site.

You can opt-out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout>, which provides you with the ability to prevent your data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

We may use a cookies, pixels, and web beacons when visiting our Website, social media page or mobile applications to improve your user experience. Cookies and other tracking technology (including pixels and web beacons) are small files placed on your browser or device store information about the way you use the website and assist us in providing our services. While you may configure your browser to reject cookies, due to the technology we use, cookies may be required to register with and purchase products and services online from our Website. You may encounter cookies or other data collection devices that are placed in your browser or on your hard drive by third parties. We use remarketing to advertise across web sites. Google (and other similar third parties) will show ads across web sites that you are visiting. These ads shown across other web sites are based on your past visits to our web site by using cookies.

You can opt out of remarketing by visiting Google's Ads Settings page at <http://www.google.com/settings/ads>

When you visit our website as well as a third party website, you may see our advertisements on such third party website. We do not control the use of cookies by third parties. You should refer to the relevant third party policy statement for specific information concerning their privacy policies and cookie usage.

The transactional services available from our Website may also use cookies to track business processes.

We use and share this information to do internal research on our users' demographics, interests, and behaviours to better understand, serve our customers and to improve or market or advertise our products and services. We also capture metrics on the number of visitors to our Website for use in server capacity needs.

We will strive to ensure that your personal information is adequately protected wherever it may be processed by our Website. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, we use Secure Sockets Layer (SSL) encryption when appropriate in the collection or transferral of sensitive data such as financial information. SSL encryption is designed to make the information unreadable by anyone but us. This security measure is working when you see either the symbol of an unbroken key or closed lock (depending on your browser) on the bottom of your browser window.



## YourHD

This is a web-based computing application designed to assist employees of HMG Hardchrome to conveniently view internal HMG news and announcements, view employee birthdays and service awards, access a range of commonly used employee forms, view internal vacancies, access your leave balances, request copies of your payslips (for delivery to your HMG email address) and to view other information such as employee benefits, merchandise, HR and safety information, learning and development information, upcoming event details and information on upcoming business projects and improvement initiatives.

Personal information may be collected throughout the use of the YourHD app or website from yourself or other individuals during their use of the YourHD app or website for employment purposes. Personal information may be collected using employee forms and may be used for employment related purposes such as investigating workplace incidents or non-compliance with forms. This information will only be accessible by the relevant department who owns the form and the IT administrators. HMG Hardchrome shall take reasonable steps to ensure only authorised personnel have access to personal information.

### Automatically Collected Information & Tracking

When you access YourHD, it automatically collects your Internet Protocol (“IP”) address and other technical information provided by your browser (e.g., your browser software, what site referred you to this Website, etc.).

Additionally, this website uses cookies and other third party tracking technologies including but not limited to:

- Platform, device, and browsers identifiers
- Viewed Pages and application screens
- Website or app interactions and browsing
- Whether you have responded to, or interacted with, an advertisement
- Referring or referred links or URLs
- Features used and activities engaged in on our sites and in our apps

Some information is also collected from your profile. The profile data stored does not store any personally identifiable information and includes:

- Department
- Cost centre
- Business centre
- Office address and location

## **The information we keep about you**

You have a right to request access to or correction of your personal information held by us.

If you wish to access, correct or update any personal information we may hold about you, please contact us as set out below.

## **Storage and security of your personal information**

We hold our customer data electronically in our IT systems and in paper files. These may include the servers of our third party service providers located within Australia. HMG will take reasonable steps to keep any personal information we hold about you secure. However, except to the extent liability cannot be excluded due to the operation of statute, HMG excludes all liability (including in negligence) for the consequences of any unauthorised access



to your personal information. Please notify us immediately if you become aware of any breach of security.

### **Overseas disclosures**

Some of the third parties to whom we disclose your personal information may be located outside Australia. The countries in which these third parties are located will depend on the circumstances. However, in the course of our ordinary business operations we commonly disclose personal information to third parties located in Papua New Guinea, Indonesia, Malaysia, China, Hong Kong, Singapore, Solomon Islands, New Caledonia and the US.

### **Complaints process**

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or the Privacy Act, please contact us as set out below.

Privacy Officer  
HMG Hardchrome (Australia) Limited  
98 Kerry Road  
Archerfield QLD 4108  
Phone: +61 7 3717 2271  
Email: [privacy@simedarby.com](mailto:privacy@simedarby.com)

When contacting us, please provide as much detail as possible in relation to the query, issue or complaint.

Your complaint will be taken seriously and will be assessed by an appropriate person with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with relevant information we may require.

If you are not satisfied with our response or how we handled your complaint, you may complain to the Office of the Australian Information Commissioner (in writing) at:

Office of the Australian Information Commissioner (OAIC)  
GPO Box 5218  
Sydney NSW 1042  
Phone: 1300 363 992  
TTY: 1800 620 241  
Email: [privacy@privacy.gov.au](mailto:privacy@privacy.gov.au)

### **Changes to this Privacy Policy**

We may change this Privacy Policy at our discretion. By continuing to use the Website, or otherwise continuing to deal with us, you accept this Privacy Policy as it applies from time to time.

### **Contact us**

Please direct any privacy issues or queries to:

Privacy Officer  
HMG Hardchrome (Australia) Limited  
98 Kerry Road  
Archerfield QLD 4108  
Phone: +61 7 3717 2271  
Email: [privacy@simedarby.com](mailto:privacy@simedarby.com)