



Snap-on Tools (Australia) Privacy Policy

Snap-on Tools (Australia) Pty Ltd ABN 55 010 793 683 (**Snap-on, we or our**) is committed to providing you with the best possible customer service. We are bound by, and respect the rights of individuals relating to their personal information under the *Privacy Act 1988* (Cth). This document is our Privacy Policy and explains how we collect and manage your personal information.

What is personal information?

When used in this Privacy Policy, the term “personal information” has the meaning given to that term in the Privacy Act. In general terms, it is any information that can be used to personally identify you. Examples of personal information include names, addresses, email addresses and telephone numbers. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

What personal information do we collect and hold?

We may collect the following types of personal information about you:

- a unique username and password;
- name;
- mailing, email or street address;
- telephone number;
- profession, occupation or job title;
- age or date of birth;
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- information you provide to us through our service centre, customer surveys or visits by our representatives from time to time.

How do we collect and hold your personal information?

Generally we collect your personal information directly from you unless it is unreasonable or impracticable to do so.

We may collect personal information from you in various ways, including when you:

- access or use our website;
- register your details on our website;
- have conversations with us and our representatives;
- complete an application or purchaser order;
- order products from us;
- contact us for information;
- participate in surveys or research;
- enter a promotion;
- subscribe to our mailing lists;
- apply for a franchise ; or
- submit a job application or accept employment with us.

We may also collect personal information from third parties including:

- third party companies such as credit reporting bodies, law enforcement agencies and other government entities;
- our related bodies corporate; and
- Snap-on franchisees, dealers and distributors.

We may hold your personal information in either electronic or hard copy form.

For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and provide the best quality of customer service to you.

We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you;
- to answer enquiries and provide information or advice about existing and new products or services;
- to provide you with access to protected areas of our website;
- to keep you up-to-date with products, services, events and promotions that may be of particular interest to you;
- to conduct business processing functions, including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for training, employment or employment application purposes;
- for planning, product development or research purposes;
- to update our records and keep your contact details up to date;
- to send communications requested by you;
- to process and respond to any complaint made by you;
- to assess the performance of, our and to improve the performance of our website;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of Snap-on Tools (Australia), its related bodies corporate, contractors or service providers;
- to comply with any applicable law, rule or regulation or in co-operation with any governmental authority of any country (or political sub-division of a country); and
- if we supply products or services on credit or provide finance to you or your company, for debt collection purposes and to assess credit-worthiness in accordance with our Credit Policy set out below.

To whom may we disclose your personal information

We may disclose your personal information to:

- suppliers and other persons with whom we have a relationship, for business, marketing and related purposes;
- any organisation for any authorised purpose with your express consent; and
- our employees, Snap-on franchisees, dealers and distributors, related bodies corporate, contractors, service providers and other third parties for the purposes of operating our website or our business, fulfilling requests by you, and to otherwise provide products and services to you. The third parties that we may disclose your personal information to include, without limitation, web hosting providers, IT Systems administrators, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants and where we supply products or services to you on credit or provide finance to you, to credit reporting bodies in accordance with our Credit Policy set out below.

We may occasionally hire other companies to provide services on our behalf, including but not limited to processing transactions and customer freight shipping. Those companies will most likely be located in New Zealand and Australia and will only receive from us the personal information they need to deliver their services to you on our behalf.

Do we disclose your personal information to anyone outside Australia?

We may disclose your personal information for some of the purposes listed above to entities located outside of Australia including to:

- our related bodies corporate, primarily located in the United States of America;
- our data hosting and other IT service providers, primarily located in the United States of America; and
- other third parties which are likely to be located in the United States of America.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

What happens if we can't collect your personal information?

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- you may not be able to access certain sections of our website
- we may not be able to provide you with information about products or services that you may want, including information about discounts, sales or special promotions; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our website may not be as enjoyable or useful.

Our website and cookies

This privacy policy also applies when using our website. For each visitor to reach the website, we collect (through the use of a "cookie" as described below) the following non-personally identifiable information including but not limited to: browser type, version and language; operating system; pages viewed while browsing the website; page access times; and referring website address. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and collect some of the information referred to above. This collected information is used solely internally for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are at the website.

Links on website

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

Security

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. Personal information is destroyed or de-identified when no longer needed or where we are no longer required by law to retain it (whichever is the later).

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Direct marketing materials

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see details below) or using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

How can you access and correct your personal information?

You have the right to access your personal information, subject to exceptions allowed by law. If you would like to do so please advise us. You may be required to put your request in writing for security reasons.

You may request information we hold about you at any time by contacting us (see details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you).

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request that we correct it. We will consider if the information requires correction. If we do not agree that there are grounds for amendment then you may request that we add a note to the personal information stating that you disagree with it.

What is the process for complaining about a possible breach of privacy? How we will deal with complaints?

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it.

We will treat your requests or complaints confidentially and our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

If you are not satisfied with our handling of your complaint or our proposed resolution, you have a right to lodge a further complaint with the Office of the Australian Information Commissioner (for more information, please see www.oaic.gov.au). The Office of the Australian Information Commissioner can provide you with further information about the next steps in its complaints process.

Changes to this Privacy Policy

We reserve our right to make amendments to this Privacy Policy at any time for any reason, including in order to comply with any future amendments to the Privacy Act. If you have objections to the Privacy Policy, you should not access or use our Website. Any updated versions of this privacy policy will be effective from the date of posting on our website.

This privacy policy was last updated on 28 March 2014.

Contacting us

We welcome your comments regarding this Privacy Policy. If you have any questions about our Privacy Policy, any concerns or a complaint regarding the treatment of your privacy, please use the contact link on our website or contact us using the contact details set below.

Please contact us during business hours Monday to Friday AEST:

Franchise Manager
Snap-on Tools (Australia) Pty Ltd
Tel: 1800 810581
Email: sota.franchise@snapon.com

Snap-on Tools - Credit Reporting Policy

Introduction

Snap-on Tools (Australia) Pty Ltd (Snap-on) is a commercial credit provider. Snap-on provides commercial credit in the following circumstances:

- A. Snap-on provides Trade Cards to eligible individuals which may be used to obtain credit from Snap-on in respect of the purchase of tools from Snap-on's franchisees;
- B. Snap-on provides finance to its franchisees to assist in setting up and operating their franchises;
- C. Snap-on provides a subscription-based software package to eligible customers, which involves provision of credit for the purposes of the Privacy Act.

In the course of these activities, Snap-on obtains credit reports and other credit information in respect of the persons to whom it provides credit.

This Credit Reporting Policy represents our policy as to our management and handling of credit information as at March 2014. We may revise this Credit Policy and our credit information practices by publishing an amended version of this Credit Policy on our website from time to time.

Key terms used in this Credit Reporting Policy are defined at the end of this Policy.

1. What kinds of credit information do we collect and hold and how do we collect and hold it?

- (a) We obtain credit information in the application forms that you complete when applying for our products. The types of credit information we obtain directly from you and hold may include:
 - Name;
 - Mailing, email or street address;
 - Telephone number;
 - Details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver; those products and services and to respond to your enquiries;
 - Any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise;
 - Information you provide to us through our service centre, customer surveys or visits by our representatives from time to time;
 - Credit information;
 - Employment and job information, and other information requested via any credit application; and
 - Payment history or other history related to credit or financial obligations.
- (b) We also collect credit information about you in credit reports we obtain from credit reporting bodies, information we obtain from other credit providers, our internal records of your performance under your credit contract with us, publicly available sources and ***transactions you may have had with your Snap-on franchisee or other Snap-on dealer.***
- (c) Any credit information that we collect is typically held on secure electronic databases at our secured information technology locations. In some limited cases paper copies are also stored by us at our offices.
- (d) The security of your personal information and, credit information and credit eligibility information is important to us and we take reasonable precautions to protect it from misuse, loss, unauthorised access, modification or disclosure. For example, we ensure that:

All building access is restricted to employees, paper files are kept secure, and all electronic databases are not only secured behind appropriate security software but access is also limited by other means, such as multi-level password requirements.

2. What kinds of credit eligibility information do we hold about you and how do we hold it?

The kinds of credit eligibility information we hold about you may include:

- (a) information provided by you on your application for credit;
- (b) credit reports that we obtain from credit reporting bodies; and
- (c) your history of performance with any account you may hold or have held with us, or any other payment transactions or contracts you may have with us or any Snap-on franchisees.

3. What kinds of CP derived information do we normally derive about you?

The kinds of CP (defined below) derived information that we usually derive from credit reporting information, from credit reporting bodies, about you includes:

- (a) payment history or other history related to credit or financial obligations;
- (b) bureau credit score based on information supplied by the bureau; and
- (c) other transactions you may have with Snap-on.

4. What are the purposes for which we collect, hold, use and disclose credit information and credit eligibility information?

We collect, hold, use and disclose credit information and credit eligibility information in order to provide the services or products that we have offered to you, including to:

- (a) assess your eligibility for credit;
- (b) administer your account or finance with us;
- (c) provide credit reporting bodies with information about you;
- (d) provide credit references to another credit provider when you apply for credit;
- (e) comply with our privacy obligations; and
- (f) to send you specific marketing materials unless you indicate you do not want us to provide you such materials.

5. Disclosing your information overseas.

Snap-on is ultimately owned by a United States-based parent corporation that may from time to time provide support and administrative services through related bodies corporate in the U.S. and other countries. Consequently, credit information and/or credit eligibility information may be disclosed to such entities in the United States.

6. Accessing your credit eligibility information and seeking correction of your credit information or credit eligibility information.

You can access credit eligibility information held by us and request the correction of your credit information or credit eligibility information we hold about you by contacting us on:

Snap-on Financial Services
Address: PO Box 6077, Blacktown NSW 2148

Telephone: 1800 646 922
Email: sota.credit@snaapon.com

We may charge an access fee to recover reasonable costs incurred. This charge is only designed to help us reasonably recover the costs associated with providing you with access and does not apply to the making of the request. Before we act on a request, we will provide an estimate of the access fee and ask you to agree before we proceed.

Access to credit eligibility information about you may be refused in a number of circumstances, such as where the information relates to anticipated legal proceedings or the request for access is frivolous or vexatious. If we deny or restrict your access, we will provide written reasons for the refusal unless, having regard to the grounds for the refusal, it would be unreasonable for us to do so. You may make a complaint about a refusal to the Office of the Australian Information Commissioner.

7. **Complaints.**

If you believe that we have failed to comply with the requirements of Division 3 of Part IIIA of the Privacy Act or the Credit Reporting Code of Conduct (**Credit Related Complaint**), you may make a complaint by contacting us on:

Telephone: 1800 646 922
Email: sota.credit@snaapon.com

If you wish to make a Credit Related Complaint, you must specify the nature of the complaint. We will not charge you for the making of the Credit Related Complaint or for dealing with the Credit Related Complaint.

If you make a Credit Related Complaint, we will:

- within 7 days after your complaint is made, given you a written notice that:
 - acknowledges you making the complaint; and
 - sets out how we will deal with the complaint;
- investigate the complaint.

If we consider that it is necessary to consult a credit reporting body or credit provider about the complaint, we will do so.

After investigating your complaint, we will, make a decision about the complaint and give you a written notice, within 30 days commencing on the day on which your complaint is made or where we agree to a longer period in writing, that:

- sets out the decision; and
- states that, if you are not satisfied with the decision, you may;
 - access a recognised external dispute resolution scheme of which we are a member; or
 - make a complaint to the Information Commissioner.

8. **Definitions**

8.1 **What is credit information?**

According to the Privacy Act, credit information about you is personal information that is:

- identification information;
- consumer credit liability information;
- repayment history information;
- a statement that an information request has been made about you by a credit provider, mortgage insurer or trade insurer;
- the type of consumer credit or commercial credit, and the amount of credit, sought in an application:
 - that has been made by you to a credit provider; and
 - in connection with which the provider has made an information request in relation to you;
- default information;
- payment information;
- new arrangement information;
- court proceedings information;
- personal insolvency information;
- publicly available information:
 - that relates to your activities in Australia or the external Territories and the individual's credit worthiness; and
 - that is not court proceedings information about you or information about the individual that is entered or recorded on the National Personal Insolvency Index; or
- the opinion of a credit provider that you have committed, in circumstances specified by the provider, a serious credit infringement in relation to consumer credit provided by the provider to you.

8.2 **What is credit eligibility information?**

Credit eligibility information includes credit information or personal information about you derived by a credit reporting body from credit information that that body holds about you or personal information we derive from information disclosed to us by the credit reporting body which has a bearing on your credit eligibility.

8.3 **What is a credit reporting body?**

A credit reporting body means an organisation or an agency prescribed under the Privacy Act that carries on a business or undertaking that involves collecting, holding, using or disclosing personal information about individuals for the purposes of, or for purposes including the purpose of, providing an entity with information about the credit worthiness of an individual.

8.4 **What is CP derived information?**

CP derived information means any personal information about you:

- that is derived from credit information or CRB derived information about you that was disclosed to a credit provider by a credit reporting body;

- that has any bearing on your credit worthiness; and
- that is used, has been used or could be used in establishing your eligibility for consumer credit.

8.5 **What is CRB derived information?**

CRB derived information about you means any personal information about you:

- that is derived by credit reporting body from credit information about you that is held by the credit reporting body;
- that has any bearing on your credit worthiness; and
- that is used, has been used or could be used in establishing your eligibility for consumer credit.