



**DAWN TOOLS & VICES PTY LTD**  
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## Privacy Policy

The AirEng Group is an Australian supplier of heavy industrial equipment. Where we handle personal information, we are subject to the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**).

In this policy, **we**, **us**, and **our** means any member of the AirEng Group, comprising MHH Australia Pty Limited ACN 619 506 384 and its subsidiaries, which include AirEng Pty Limited ACN 060 583 164, Aerotech Fans Pty Limited ACN 616 452 405 and Dawn Tools and Vices Pty Limited ACN 616 452 781.

Normally our customer is a company, and companies do not have rights under the APPs. However, we need to collect some information about employees and officers in order to provide our services. This Privacy Policy (other than Paragraph 11) explains how we manage **personal information** about individuals other than employees (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable), including our obligations and your rights in respect of our dealings with your personal information. Paragraph 11 explains the position of employees.

### 1. Types of personal information we collect

The type of personal information we may collect can include (but is not limited to), your name, title, postal address, email address, phone numbers, and drivers licence number.

If you apply for a position as an employee, we may collect information contained in your application. If you become an employee, Paragraph 11 applies. If you are an officer, we may collect information about you in respect of that position.

If you are a customer, we may collect all information that we reasonably need for our business functions and activities (including providing you with our goods and services and running the administration of our business).

### 2. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- (a) when you make an inquiry or order in relation to our goods or services, in person, by phone or email;
- (b) in administering and performing any contracts with service providers;
- (c) while conducting customer satisfaction and market research surveys;
- (d) when administering any of our services; and
- (e) as otherwise required to manage our business.

However, in certain cases we may collect personal information from publically available sources and third parties, such as suppliers, contractors, our clients and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

If you apply for credit we may also collect information about you from a credit reporting body as described in paragraph 6.

We collect personal information where we need it to provide service,. If the information is not provided, we may not be able to provide services to you effectively.

### **3. Our purposes for handling your personal information**

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use and disclose personal information to:

- (a) provide our goods and services;
- (b) manage and administer those goods and services, including account keeping procedures;
- (c) communicate with you, including (but not limited to), emailing you tax invoices, dispatch and tracking information, returns and exchange authorisations;
- (d) comply with our legal and regulatory obligations; and
- (e) otherwise to manage our business.

Paragraph 6 describes how we handle any credit information.

We may disclose personal information on a confidential basis to our professional advisors and insurers, . Otherwise, we will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure.

We may disclose personal information between our AirEng Group members and to third parties such as our suppliers, organisations that provide us with technical and support services, insurers and professional advisors. We may also disclose personal information to any person who proposes to acquire the whole or part of one of our businesses. If we disclose information to a third party, we generally require that the third party hold the information confidential and protect it to the same extent that we do.

### **4. Protection of personal information**

We will hold personal information as either secure physical records, electronically on our intranet system. We do not store any personal information outside Australia.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information. AirEng Group employees can only access information which is needed to perform their roles.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

## 5. Direct marketing

Like most businesses, marketing is important to our continued success. We believe we have a unique range of products and services that we provide to customers at a high standard. We therefore like to stay in touch with customers and let them know about new opportunities. We may provide our customers and their officers with information about new products, services and promotions either from us, or from third parties which may be of interest to you.

We will not disclose your personal information to third parties for marketing purposes without your consent.

You have the right to opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer.

## 6. Credit reporting

Where our customer has applied for credit, we may seek credit reports (including consumer credit reports) from directors or shareholders and any person who is to guarantee the credit. Under the law, we require the individual's written consent before we can do this. Information we obtain from credit reporting agencies is used only in relation to the credit application and the ongoing management of the credit and guarantor relationship.

We disclose personal information to credit reporting bodies to obtain a credit report, and we may also disclose personal information to credit reporting bodies in the course of enforcing any credit agreement or guarantee.

The credit reporting body we use is Illion, formerly Dun & Bradstreet. Illion's credit reporting policy is set out at [www.illion.com.au/legal/illion-credit-reporting-policy-australia](http://www.illion.com.au/legal/illion-credit-reporting-policy-australia), Phone: 1300 734 806, Email: [pac.austral@illion.com.au](mailto:pac.austral@illion.com.au)

Credit reporting bodies can use your credit information in reports provided to credit providers (such as us) to assist such providers to assess your credit-worthiness. You have the right to request a credit reporting body not use or disclose credit reporting information about you, if you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud.. Under law, credit reporting bodies can use information they collect to screen people before credit providers make offers to them. You can contact the credit reporting body if you do not want your credit information to be used for 'pre-screening assessments'.

Contact a credit reporting body or check its privacy policy for more information about the above rights. The privacy policy of the credit reporting body will also govern the body's use, collection, disclosure and management of your personal information (including credit information).

## 7. Accessing and correcting your personal information

You may contact our Privacy Officer to request access to personal information that we hold about you and/or to make corrections to that information, at any time. In some cases, the Privacy Act allows us to decline to provide access. If we do decline access, we will give you reasons in writing. We may charge you our reasonable costs for providing you with access to any personal information.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

## 8. Overseas transfers of personal information

As at the date of this Privacy Policy, we are not likely to disclose your personal information to overseas recipients.

If in future we do propose to disclose personal information overseas, we will do so in compliance with the requirements of the Privacy Act. We will, where practicable, advise affected individuals of the countries in which any overseas recipients are likely to be located.

As at the date of this Privacy Policy, we are not likely to disclose personal information to other overseas recipients. If in future we do propose to disclose personal information overseas, we will do so in compliance with the requirements of the Privacy Act. We will, where practicable, advise affected individuals of the countries in which any overseas recipients are likely to be located.

## 9. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Privacy Officer:

### **The Privacy Officer**

Address: 176 Colchester Road, Bayswater VIC 3153

Telephone: +61 3 8799 0812

Email: [michaelz@aireng.com.au](mailto:michaelz@aireng.com.au)

We take all complaints seriously, and will respond to your complaint within a reasonable period, usually within 30 days unless we need additional information from you.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

### **Office of the Australian Information Commissioner**

GPO Box 5218

Sydney NSW 2001

Telephone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## 10. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.

## 11. Personal information about employees

We collect information in relation to employees as part of their application and during the course of their employment, either from them or in some cases from third parties such as recruitment agencies. Under the *Privacy Act*, personal information about a current or former employee may be held, used or disclosed in any way that is directly connected to the employment relationship. We handle employee information in accordance with legal requirements and our applicable policies in force from time to time.

The last update to this document was 9 August 2019.