



PRIVACY STATEMENT

AOTAI (AUSTRALIA) INVESTMENT AND HOLDING PTY LTD, trading as "Fine Steel" ('the Company', 'We') are committed to protecting and maintaining the privacy, accuracy and security of all personal information held by the Company. The Company will take reasonable steps when handling personal information consistent with our obligations under both the Privacy Act 1988 (Cth) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth). The Company will ensure that personal information is collected, used, held and disclosed by the Company in accordance with the 13 Australian Privacy Principles (APPs) under the Privacy Act 1988. This policy applies to any person, or their nominated representative, who has provided the Company with their personal information for the purpose of buying, selling or otherwise dealing with the Company.

1. The kinds of personal and sensitive information that the Company collects and holds

The Company collects personal information directly from the subject or their representative. Personal information is any information about an individual, whether true or not, where the individual can reasonably be identified. Personal information may be gathered by a variety of ways, including but not limited to order forms, telephone, email or face to face meetings. The kinds of personal information the Company may collect and hold, includes but is not limited to:

- Name; Address; Contact details; Identity documents
- Australian Business Number (ABN)
- Credit card and details of other payment instrument
- Financial and billing information (including but not limited to bank account details)
- Order records
- Country of origin

This information may be held because, you or the entity you work for or act on behalf of, have engaged the Company for a service or create certain commercial relationship with the Company, where we have requested it (either directly from you or the entity that you work for or act on behalf of) ..

By signing on this document, you agree to provide your consent for us to collect and hold your information. If you provide us with third party personal information, you warrant to us that you hold the third party's consent to provide their personal information to us under this Privacy Statement.

2. The purposes for which personal information is collected, held, used and disclosed

The Company will only collect information if it is necessary to carry out the Company's functions and activities. This collection and storage will be by lawful and fair means.

We may use and disclose your personal information for a variety of reasons. These reasons include, but are not limited to:

- providing the service you wish to use;
- Supplying the goods you ordered;
- providing any technical or after sales support to you;
- processing the payments from you for our goods and services;
- checking and verifying the information you have provided, and the personal information located from other sources is correct;
- to communicate with you, our customer;
- to understand the needs of our customers and continuously develop and improve our products and services;
- to protect against fraud or other misuse or loss of data;
- improving our internal management purposes;
- When liaising with affiliated and non-affiliated entities both domestically and internationally;
- for any other purpose permitted by law or with your further consent.

The data and all personal information collected and held by us may also be used as part of our internal processes such as audits and quality controls.

3. Circumstances that personal information may be disclosed by the Company

We will endeavour to only use and disclose personal information for the primary purpose of conducting our functions and activities. However, there may be circumstances where personal information is disclosed for purposes other than the Company's primary purpose.

We may disclose personal information to:

- Credit reporting agencies and courts, tribunals and regulatory authorities where our customers fail to pay for goods or services provided by us to them;
- Courts, tribunals, regulatory authorities and law enforcement officers as required by law, or in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- Government agencies, such as the Australian Taxation Office, Federal Police or other police force, AUSTRAC, corporate regulators such as Australian Securities and Investments Commission and other government agencies or regulatory bodies, if the Company is required to do so under law or by order; and
- Third parties, including agents or sub-contractors, who assist us in providing information, goods/products, services or direct marketing to you. This may include parties located, or that store data, inside or outside of Australia.

If there is a change of control of our business or a sale or transfer of the whole or part of the business assets, we reserve the right to transfer to the extent permissible by law our user

databases, together with any personal information and non-personal information contained within these databases. This information may be disclosed to a potential Purchaser. We would seek to only disclose information in good faith.

4. The quality of the information collected, used, held and disclosed

The Company will take reasonable steps to ensure that the personal information it collects, uses, holds or discloses is accurate, complete and up to date. All staff with access to, and required to deal with, personal information will be trained in the need for confidentiality in order to protect the privacy and personal information of individuals.'

5. The security of the information collected, used, held and disclosed

In order to ensure the integrity of all information the Company will take all reasonable steps to hold personal information in a manner which is secure and protected from unauthorised access. These 'reasonable steps' will include mechanisms such as password protection, physical restrictions and staff training in order to ensure no information is incorrectly modified, disclosed, misused or lost.

The information will be held in either a physical or electronic form. Any unsolicited personal information received by the Company will be destroyed as soon as practicable if it is lawful and reasonable to do so.

Personal information stored by us may be destroyed by the intentional act of the Company or not..

Secure disposal of electronic records will include:

- Overwriting records before they are deleted;
- Deleting backup files;
- Physically destroying drives and backup files

Secure disposal of paper based records will include:

- Shredding of paper files; and
- Contacting an authorised disposal company for secure disposal.

6. Access and correction of personal information

The Company will provide access to information within a reasonable period of time. Reasonable steps will be taken to provide access and if access to information is refused the Company will provide reasons for this refusal in writing. The mechanisms to complain about the refusal will be provided upon request.

You can ask for information to be corrected if it is inaccurate, out of date, incomplete, irrelevant or misleading. If the Company is satisfied this is the case, reasonable steps will be taken in order to correct the information. Requests for personal information must be in writing and all requests will be responded to within 30 calendar days.

Whilst employee records are exempt from the Privacy Act 1988 (Cth) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth), the Company will still ensure that information held on current and former employees is kept confidential. Any information that the Company holds on prospective candidates for employment will be destroyed in accordance with clause 1.4 of this policy.

To seek access to, or correction of, your personal information please contact the Company as follows:

- By email: admin@finesteel.com.au
- By mail: 271 Edgar Street Condell Park NSW 2200

7. Cross Border data flows

The Company may on occasion be required to transfer or store personal information with/ to a person or related body corporate in a foreign country. This transfer will take place if the information is subject to a law, binding scheme, or contract which treats information with a substantially similar integrity as the Australian Privacy Principles. The Company will take reasonable steps and conduct sufficient enquiry in order to ensure this is the case.

In some cases, your personal information may be required to be disclosed to organisations pursuant to foreign law, and we will disclose the information only when it is necessary to do so.

8. Complaint Process

Complaints regarding the information that the Company collects, uses, holds or discloses should be made in writing to The Manager. If a company or individual believes there is a breach of this policy or the Privacy Legislation, a written complaint should be made to The Manager. All complaints will be dealt with confidentially and promptly.

9. Policy Revision

The Company may revise or update this policy at any time by posting a revised policy on our website. Please note that our use of your personal information will be based on the privacy policy in effect at the time the information is used.