

External Party Privacy Policy

This External Party Privacy Policy (Policy) relates to Wesbeam Pty Ltd (Wesbeam) and, where relevant, operates in conjunction with other policies and procedures relating to the disclosure of Personal Information and Confidential Information.

Purpose

This **External Party Privacy Policy** has been created to exhibit how Wesbeam is required to treat confidential information. Wesbeam will unavoidably receive and handle personal and private information about External Parties. We want to make sure that this information is well-protected.

We must protect this information for two reasons. It may:

- Be legally binding.
- Constitute the backbone of Wesbeam, to provide a competitive advantage.

Scope

This Policy applies to all External parties of Wesbeam required to enter data via Wesbeam's website (e.g. when filling out an order form). These external parties can be prospective, current or former.

Commencement Of Policy

This Policy will commence from 19/08/2022. It replaces all other policies of Wesbeam, if any, relating to the disclosure of external party's Confidential and Personal Information (whether written or not).

Definitions

In this Policy, the following terms are defined as:

- 'External Parties' refer to persons or entities that have been engaged by Wesbeam or has engaged Wesbeam for a Relevant Purpose' (i.e. client, supplier, customer or partner of Wesbeam).
- 'Relevant Purpose' is a purpose related to the person's interaction or engagement with Wesbeam whether it be prospective, current or retrospective. Examples of a Relevant Purpose include but are not limited to, recruitment, selection, training, development, consulting, counselling, or engagement of services.
- 'Personal Information' refers to information or an opinion about External Parties from which that person's identity can reasonably be ascertained. This includes any personal information or opinions about the person, whether true or not, no matter how the information or opinions are recorded. Wesbeam only collects Personal Information that it needs for a Relevant Purpose.
- 'Sensitive Information' is a special category of Personal Information and includes information about a person's health, race or ethnic origin, political or religious beliefs, membership of a trade union or association, sexual preference or criminal record.

- 'Confidential Information' includes (but is not limited to) the following, Wesbeam's and its Related Bodies Corporate and External Parties: trade secrets; intellectual property; confidential know-how; policies, systems and protocols; information about the business and its affairs such as pricing and fee information, marketing or strategic plans, commercial and business plans, financial information and data, and operational information and methods; methodologies and supporting documentation; software products, manuals and associated tools; commercial information in relation to current and prospective operations; information about suppliers, dealers, clients or customers such as their specific requirements, arrangements and past dealings; client lists, customer lists, supplier lists, dealer lists; customer, client and supplier lists; business cards and diaries, calendars or schedulers; reports; working papers; training manuals; equipment; computer information and programs; Personal and financial information of which employee's become aware, and all other information obtained from Wesbeam or obtained in the course of an employee's employment with Wesbeam that is by its nature confidential
- 'Direct Marketing' is the use and/or disclosure of personal information to communicate directly with an individual to promote goods and services.
- 'Related Bodies Corporate' as defined in the Corporations Act 2001 (Cth).

Information Shared via Wesbeam Website

When visiting Wesbeam's website, Wesbeam keeps a record of a user's visit. The following information may be collected for statistical purpose and may be used by Wesbeam to improve the website:

- A users Internet Protocol (IP) address
- The previous site visited by a user
- The type of browser and operating system used by the visitor
- The pages accessed and the documents downloaded by the user

Wesbeam will not attempt to identify users or their browsing activities, however, government agencies may be entitled to inspect such records in the event of an investigation.

Cookies

The Wesbeam website uses tracking technologies called 'cookies', including to monitor the pages accessed by browsers on the website. External Party cookies may be placed by contracted service providers on Wesbeam's website and Wesbeam may share anonymous aggregate information from the website with contracted service providers. Visitors may set their browser to refuse cookies if they wish, although this may affect their browsing experience.

Cookies are small text files which are stored in memory or on a user's hard drive for record keeping purposes and are used to enhance Wesbeam's website.

Visitors may set their browser to refuse cookies without impacting the use of the Wesbeam website. Visitors may find out how to do this by visiting www.aboutcookies.org or www.allaboutcookies.org.

Hyperlinks

The Wesbeam website may contain links to other websites. Wesbeam are not responsible for the privacy practices or the content of other websites. The privacy practices applicable to other websites may differ substantially from ours. We advise that users of these websites read the privacy policy of any other websites before visiting them.

Information released publically by user

Users who publish or submit personal information on publically accessible sections of the Wesbeam website or on Wesbeam social media platforms, are solely responsible for the release of that personal information and Wesbeam are not liable or responsible in relation to the release of that personal information.

Personal Information Used For Marketing

Wesbeam may use personal information obtained from External Parties for the purposes of direct marketing. Wesbeam's marketing department may employ direct marketing techniques to promote goods and services directly to External Parties. This may involve unsolicited communications or communications to existing External Parties. Information obtained by Wesbeam for the purpose of direct marketing may be used and disclosed by the company for the primary purpose of direct marketing.

Information gathered from External Parties for purposes other than direct marketing may still be used by Wesbeam to market their goods and services if the following conditions are met:

- The information is not sensitive information;
- It is impracticable for Wesbeam to seek the External Party's consent before the particular use;
- Wesbeam must, on request, be able to notify an External Party of its source of the External Party's personal information that it has used or disclosed for the purpose of direct marketing unless it is unreasonable or impracticable to do so;
- In each direct marketing communication with the External Party, Wesbeam draws to the External Party's attention, or prominently displays a notice, that they may opt out of receiving further direct marketing communications;
- Wesbeam provides a simple straightforward means for the External Party to opt out and does not charge for the External Party to opt out;
- The External Party has not opted out of receiving direct marketing material from Wesbeam in the past; and
- In each written direct marketing communication with the individual, Wesbeam sets out its business address and telephone number and, if the communication was by electronic means, a number or address at which Wesbeam can be directly contacted electronically.

Sensitive information gathered by Wesbeam (such as information about an External Party's racial or ethnic origins, political or religious beliefs and health information), will not be disclosed for the purpose of direct marketing unless the External Party has consented to the use or disclosure of the information for that purpose. For consent to be valid the following criteria must be met:

- The External Party is adequately informed before giving consent;
- The External Party gives consent voluntarily;
- The consent is current and specific; and

- The External Party has the capacity to understand and communicate their consent.

If an External Party requests not to receive direct marketing communications from Wesbeam the organisation must not charge the individual for making or giving effect to the request. Wesbeam must also stop using or disclosing the personal information for the purpose of facilitating direct marketing within a reasonable period after the request is made. A 'reasonable period' would be no more than 30 days.

Security and Retention of Personal Information

Wesbeam takes such steps as are reasonable in the circumstances to protect personal information from loss, misuse, interferences, unauthorised access, modification or disclosure. However, no method of protection is 100% secure and Wesbeam cannot guarantee absolute security (Wesbeam cannot be held liable in this regard).

Wesbeam employs a number of means to protect the personal information of its External Parties, including:

- Restricted access to personal information;
- Maintaining technology products maintained to prevent unauthorised computer access; and
- Regular review and testing of our technology in order to improve the level of security.

Right to Access Personal Information

Third parties may request to access or correct any of the personal information Wesbeam holds in relation to them. An External Party's entitlement to access their personal information will be subject to applicable laws.

The request for access to information will be handled as soon as reasonably practicable. Wesbeam will comply with applicable laws and, in any event, endeavour to process the request within 30 days following the request.

Right to Correction

Wesbeam takes reasonable steps to ensure that information is up to date and complete. However, if an External Party believes the information held about them is inaccurate or incomplete, they may request for it to be corrected.

Right to Withdraw Consent

If an External Party has given Wesbeam explicit consent for the use of their personal information, they are able to withdraw their consent at a later date. (However, this will not affect the lawfulness of the previous use of the information).

Additionally, where External Parties have subscribed to receive emails from Wesbeam, they can unsubscribe from this list at any time by contacting the Human Resources Department via the email address Human.Resources@wesbeam.com.

Complaints

If an External Party has a complaint about Wesbeam's privacy practices, they should contact the Human Resources Department via the email address Human.Resources@wesbeam.com.

Non-Disclosure

Current, former or prospective employees of Wesbeam are not permitted to disclose confidential or personal information (as defined on page 1 above) which is collected by Wesbeam about its External Parties.

Variations

Wesbeam reserves the right to vary, replace or terminate this policy from time to time.

Acknowledgement

I acknowledge:

- Receiving, reading and understanding the *Wesbeam Pty Ltd External Party Privacy Policy*;
- That I will comply with the Policy; and
- That there may be disciplinary and/or legal action taken against me if I fail to comply, which may result in the termination of my employment, the cancellation of my engagement, the loss of my position and/or legal proceedings against me.

Full Name	
Signature	
Date	