

# Privacy Policy

March 2025 Edition

## 1. Introduction

Coates Group Holdings Pty Limited (ABN 85 126 069 341) and its subsidiary companies (**Coates, us, we**) value the privacy of individuals and is committed to safeguarding information it receives in connection with its business activities.

This policy outlines how Coates collects, uses, discloses, stores, handles and protects personal information about an individual under the *Privacy Act 1988* (Cth), as amended (the **Act**), and the Australian Privacy Principles (**APPs**) set out in that Act, and how an individual can make enquiries or issue any complaint about the manner in which we handle personal information that we hold about them.

This Privacy Policy should be read alongside our Terms of Use, and any other terms and conditions that apply to the products and services we provide to you.

We may update or change this Privacy Policy from time to time, including to take account of new or amended laws, new technology or changes to our operations. If we do so, we will publish the updated policy on our website. All personal information held by us will be governed by our most recent updated policy. You are responsible for reviewing this Privacy Policy periodically and informing yourself of any changes. We suggest that you check back regularly. If we make significant changes to our Privacy Policy that impact on your rights, we will seek to inform you by notice on our website or by email.

This policy was last updated 4 March 2025.

## 2. What is personal information

In this Privacy Policy, 'personal information' has the meaning set out in the Act. In general terms, personal information is information (whether fact or opinion) about an individual who is identified or reasonably identifiable from that information or other information combined with that information.

Some types of personal information are classified as 'sensitive information' and/or 'health information', which are subject to additional protection under the Act. Sensitive information may include information about your racial origin or health status, and health information may include information about a health-related service you have had or will receive, including test results and appointment details.

## 3. What types of personal information do we collect?

The types of personal information we collect about you will depend on the purpose for which the personal information is collected. This can include:

- in the case of customers procuring our products and/or services – your name, billing or shipping address, email address, telephone number(s), payment information (including credit card information or alternative payment method account information), identity documentation such as a drivers licence, and your order details;
- in the case of customers purchasing or hiring products through our store – your name, billing or shipping address, email address, telephone number(s), payment information (including credit card information or alternative payment method account information), identity documentation such as a drivers licence and your order details;

- technical information and general analytics, such as web browser type and browsing preferences, Internet service provider, referring/exit pages, date/time stamps, IP address, time zone and geolocation data (if applicable), some of which is collected automatically, arising from your use of our website and/or platforms, as well as information about your usage of our website and/or platforms when browsing (see **“Information collected via our website”** below);
- if you have requested to receive news about exclusive offers, promotions, or events from us – your name, mailing or street address, email address, and telephone number(s);
- if you have contacted us to make a complaint, provide feedback, submit an enquiry, request a call-back or request a product replacement – your name, mailing or street address, email address, and telephone number(s);
- in the case of commercial credit applicants – information required to assess your credit worthiness, including your credit or business history and any trade referees;
- in the case of our sites where we have CCTV technology installed – CCTV footage and recordings;
- in the case of prospective employees or contractors – information contained in your application or resume, recorded during any interview, or obtained through any pre-employment checks, and government-issued identifiers such as tax file numbers; and
- in the case of our suppliers and distributors – your name, mailing or street address, email address, and telephone number(s).

Coates does not collect sensitive information.

When dealing with Coates Hire, you have the right to remain anonymous or use a pseudonym. However, if we cannot collect personal information, we may not be able to provide you with the information or assistance you require. For example, we will not be able to send you information you have requested if you have not provided us with a valid email address or telephone number.

#### 4. How do we collect personal information?

We collect your personal information directly from you, including when you:

- access or use our website;
- subscribe to or hire/purchase our products or services;
- sign up to receive news and exclusive offers, promotions, or events;
- enter surveys, competitions, promotions or request information or material from us;
- make inquiries about us or our products or services or otherwise communicate with us by email, by telephone, in person, via a website or otherwise; and
- apply to work with us or are engaged by us as a contractor.

Where it is reasonable and practicable to do so, we will only collect personal information about you from you directly and not from third parties.

In limited circumstances, we may collect personal information about you from publicly available sources (such as the Internet) and from third parties (such as mutual contacts, or if someone makes a purchase on your behalf, or from your referees during the recruitment process if you apply for a job with us). We may also collect personal information through third parties such as our service providers or a credit reporting agency in accordance with our Credit Reporting and Credit-Related Personal Information Policy, or through promotional and marketing activities.

#### 5. Information collected via our website

To ensure we are meeting the needs and requirements of our website users, and to secure and develop our online services, we may collect information by various means including via:

- system log files, which track actions occurring on our website;
- cookies, which are unique identification numbers that are placed on the browser of our website users. The cookies do not in themselves identify users personally but are linked back to a database record about them. For more information about cookies, and how to disable cookies, visit <https://allaboutcookies.org>;

- web beacons, tags and pixels, which are electronic files used to record information about how you browse our website; and
- Google Analytics and Hotjar, which collect session statistics, geolocation, and browser and device information.

Further information on how information is collected and processed by Google Analytics [here](#), and by Hotjar [here](#). Any third-party links or advertising on our website may also use cookies; you may receive these cookies by clicking on the link to the third-party site or advertising. We do not control the collection or use of information by these third parties, and these third-party cookies are not subject to this Privacy Policy. You should contact these companies directly if you have any questions about their collection and/or use of information. When linking to any other site, you should always check the relevant website's privacy policy before providing any personal information.

You may disable your web browser from accepting cookies and other tracking technologies used to collect technical information and general analytics when browsing our website. If you do so, you can still access our website, but it may impact your user experience.

You may also opt out of targeted advertising by using the links below:

- [Facebook](#);
- [Google](#); and
- [Bing](#).

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's [opt-out portal](#).

## 6. How will we use and disclose personal information?

Coates will generally use, collect, hold or disclose personal information about you as required for our business functions and activities, which may include the following:

- to provide you with products and services and to send communications requested by you;
- verify your identity, where necessary to do so
- to obtain credit history information about customers and potential customers [in accordance with our Credit Reporting and Credit-Related Personal Information Policy – [Credit Reporting + Credit Related Personal Info Policy - Coates](#);
- to tailor our communications to you;
- to send information about future events, promotions, regular email communications or newsletters (both electronic and hardcopy) outlining news, services, products or events;
- to conduct business processing functions;
- consider you for a job at Coates;
- for our internal administrative, marketing and planning requirements;
- to compile and report statistics using de-identified information;
- to comply with our legal obligations, such as notifying you of matters required by law;
- for direct marketing purposes, where you have opted-in to receive direct marketing (as further described below);
- for purposes that are expressly permitted under any agreement with you; and
- where it is suspected that potential or actual unlawful activity (e.g. fraud) has taken place.

We may also use or disclose your personal information for our administrative, planning, product or service development, quality control and debt collection purposes, and for other purposes to which you have consented, or as otherwise permitted or required by law.

Technical information and general analytics are used for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are using our website, and to improve our website and our products and services.

We may disclose your personal information to the following parties for the purposes described above and further below:

- our employees, related bodies corporate, contractors or service providers for the purposes of: operating of our website; conducting our business activities; fulfilling requests by you; processing credit card transactions; providing products and services to you; or for one of the purposes set out above;
- suppliers and third parties with whom we have commercial relationships, for business, marketing and related purposes;
- our professional advisers (such as lawyers, accountants or auditors) and insurers;
- organisations authorised by us to conduct promotional, research or marketing activities;
- third parties to whom you have authorised us to disclose your information (e.g. referees or account nominees);
- to debt collectors when payments are overdue; and
- any other person as required or permitted by law.

Coates may share personal information with related companies or with contractors performing services for us. In these instances, we will use reasonable endeavours to ensure that these organisations are required to comply with the APPs, for example (where commercially practical) by including suitable privacy and confidentiality clauses in our agreement with a third-party service provider to which we disclose your personal information.

### **Direct Marketing**

We may use your personal information for direct marketing or to advise you about new services and marketing initiatives that may be of interest to you, where you have consented for us to do so.

These communications may be sent in various forms, such as mail, SMS, fax and email, and social media in accordance with applicable laws. These communications may also be sent from some of our third-party providers. Any direct marketing material will include a link allowing you to nominate if you do not wish to receive further direct marketing communications from us. You can also opt-out of receiving marketing communications from us by contacting us at the details set out below (and on each communication).

### **Cross-Border Transfers**

In limited circumstances, we may share your personal information with recipients that are located outside of Australia, including to India.

If we send your personal information to a recipient in a country with privacy and data protection laws which are at least substantially similar to the Act and APPs, and where there are mechanisms available to you to enforce protection of your personal information under that overseas law, we will not be liable for a breach of the Act and APPs if your personal information is mishandled in that jurisdiction. If your personal information is transferred to a jurisdiction which does not have privacy and data protection laws as comprehensive as Australia's, we will take commercially reasonable steps to secure a contractual commitment from the recipient to handle your personal information in accordance with the Act and APPs.

## **7. How will Coates store and manage your data?**

We store your personal information in hard copy files and/or other electronic record keeping methods in secure databases. We do not combine or link personal information we hold about you with other personal information about you from third party sources.

From time to time, personal information may be held on or within systems internal and external to Coates including public and private clouds. We will take reasonable steps to protect the personal information we hold from misuse and loss, interference and from unauthorised access, modification or disclosure.

We maintain physical security over paper and electronic data sources, such as through locks and security systems at our premises. We also maintain computer and network security, for example, we use firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

However, the internet is an insecure medium, and users should be aware that there are inherent risks transmitting information across the internet. We cannot guarantee the security of transmission of personal information disclosed to us online. You transmit your personal information to us online at your own risk and are encouraged to exercise

care in sending personal information via the internet. Please notify us immediately if you know or reasonably suspect that your personal information has been subject to any data breach, breach of security or other unauthorised activity. Generally, we retain your personal information for the period necessary for the purposes for which your personal information was collected (as outlined in this Privacy Policy) unless a longer retention period is required by law or if it is reasonably necessary for us to comply with our legal obligations, resolve a dispute or maintain security. Coates will take reasonable steps to securely de-identify or dispose of personal information when we have no further need to use it, or when we are required by law to do so.

## **8. How can I access and correct information?**

You may request access to personal information that we hold about you. We will provide you with access to personal information in accordance with the Act and APPs but there are circumstances where we may not be able to grant you access to the personal information that we hold where permitted by the Act the APPs. If you are refused access to personal information, we will provide you with reasons for the refusal.

Coates will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date. If you believe that the personal information, we hold about you is inaccurate or out of date, please let us know immediately and request us to amend it. We will consider your request, and if we are satisfied with your request, we will take reasonable steps to correct the information. If we do not agree that there are grounds for amendments, then we will follow the procedures set out in the Act and APPs. You can request that we make a record of your correction request with the relevant information.

All requests for access to personal information must be made in writing to Coates. We may charge a reasonable fee for processing your request.

## **9. Contact, complaints and further information**

If you have any questions in relation to the information handling procedures of Coates Hire, any complaint regarding our treatment of your personal information, please contact our Privacy Officer in writing on the following contact details.

By Mail: Privacy Officer - Coates  
Level 1, 201 Coward Street, Mascot, NSW, 2020  
By email: [privacy.officer@coates.com.au](mailto:privacy.officer@coates.com.au)

We may need you to provide more information about your concern. If your concern is genuine, we will investigate the issue and endeavour to provide you with a written response as soon as possible upon receipt. Sometimes we might be delayed in providing you with a written response and if is the case, we will use reasonable endeavours to contact you to explain the reason for the delay (where feasible).

If you are not satisfied with our response, please notify the Privacy Officer in writing. We may escalate your matter and review the response that you were given. You may also direct your concerns to the Office of the Australian Information Commissioner, whose contact details are set out below:

Office of the Australian Information Commissioner  
PO Box 5218  
Sydney NSW 2001  
Phone: 1300 363 992  
Online: <https://www.oaic.gov.au/about-us/contact-us>  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

You are entitled to make an anonymous complaint or inquiry in relation to this Privacy Policy or your privacy rights. However, we may require you to identify yourself if required by law or if it is impracticable for us to deal with your matter otherwise.