

This Privacy Policy is Stair Lock Pty Ltd's ("Stairlock") official privacy policy and it applies to all personal information collected by Stairlock.

In this policy we explain how and why we collect your personal information, how we use it, and what controls you have over our use of it.

Stairlock is committed to complying with the Australian Privacy Legislation and to protecting and safeguarding your privacy when you deal with us.

## 1. Collection

Where possible, we collect your personal information directly from you during the course of our business relationship. The personal information collected is necessary to provide you with our goods and services.

## 2. Use and Disclosure

We collect personal information from you in order to provide you with our goods and services, to provide you with advertising and promotional materials (if you choose to receive them), to facilitate our internal business operations including fulfilment by us of any legal requirements and to manage and improve our customer relationships.

We treat your personal information as strictly private and confidential. We will not disclose your personal information outside the company unless:

- a. You consent; or
- b. It is required in the course of providing goods and services to you; or
- c. It is for external administrative purposes and on a strict confidential basis; or
- d. We are required to do so by law.

We do not disclose your personal information (including your email address) to any third party for the purpose of allowing them to market their products or services to you.

## 3. Data Quality

The accuracy of your personal information is important to us. We will take all reasonable steps to make sure that your personal information is accurate, complete and up-to-date.

We ask that you contact us at any time to update or change your personal information if you become aware that any of the personal information we hold about you is inaccurate, incomplete or outdated.

## 4. Data Security

We have in place a number of security safeguards to protect your personal information from misuse, loss, unauthorised access, modification or disclosure;

- a. All electronic databases incorporate strict password access and virus protection procedures;
- b. Sensitive personal information is only accessible by designated staff bound by duties of confidentiality;
- c. Internal and external security is employed;
- d. All staff receive regular training regarding Stairlock's Privacy Policy and information handling practices.
- e. When we no longer require your personal information, it is securely destroyed and/or deleted from our systems. This usually occurs seven years after the completion of our business relationship.

Where an eligible data breach occurs, we will comply with the Notifiable Data Breach Scheme under the Privacy Act, including notifying affected individuals and the Office of the Australian Information Commissioner (OAIC) where required.

## 5. Openness

Our information handling practices are outlined in this policy statement, which is available on request.

Upon request, we will take reasonable steps to inform you of what personal information we hold for what purpose, and how we collect, hold, use and disclose that information.

## 6. Access and Correction

You may request access to the personal information we hold about you at any time. We may charge a fee to cover the costs of retrieval and copying, which will not be excessive and will not apply to lodging a request for access.

We may deny you access to your personal information in certain circumstances, for example where “the Act” allows us to do so.

We will always provide reasons for denial of access or refusal to correct personal information.

Where you establish that personal information we hold about you is not accurate, complete or up-to-date, we will take reasonable steps to correct the information.

**7. Identifiers**

We do not adopt an identifier that has been assigned to you by a Commonwealth Government Agency (e.g. tax file number) as a means of identifying you.

**8. Anonymity**

We provide you with the opportunity to interact anonymously with us whenever it is practicable to do so, for example where you enquire about the types of goods and services we offer.

**9. Trans border Data Flows**

We will not transfer your personal information to a recipient overseas unless you consent, we are required to do so by law or it is required in the course of providing goods and services to you.

**10. Sensitive Information**

We do not collect, use or disclose sensitive information about you (such as racial or ethnic origin, political opinions, memberships, religious beliefs, sexual preference, health or criminal record) unless you consent, where it is allowed by law or in circumstances where it is required in the course of providing goods and services to you.



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Approved by: *Edward Lloyd* *Managing Director*

*Date: 24/11/2025*