

NSK Australia Pty. Ltd.

Privacy Policy

Privacy Policy

Policy Objective:

In accordance with the Privacy Act 1988 (Cth) (**Privacy Act**) NSK Australia Pty Ltd (**NSK**) is required to comply with the Australian Privacy Principles (**APPs**) in relation to how it collects, uses, discloses, stores and destroys personal information.

NSK takes its Privacy Act obligations seriously and will seek to take all reasonable steps in order to protect the privacy of the personal information that we hold. This policy sets out how NSK manages personal information about you.

In the course of doing business, we endeavour to collect business information only. However, the collection of personal information in some instances is necessary or unavoidable.

Personal information is information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

Sensitive Information, a sub-set of personal information, is information or an opinion about an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information and genetic information. We may collect some sensitive information such as your personal preferences, interests, affiliations and/or memberships in the course of providing you with our products and services.

Policy Description:

What personal information we collect and hold

The kinds of personal information we collect from you or about you depends on the transaction you have entered into with us, the goods and services you or your organisation have contracted us to provide, and the goods and services you or your organisation are interested in.

The kinds of personal information that we commonly collect and hold from you or about you include: your name, address, phone and fax numbers, email address, date of birth, gender, drivers licence details, bank account details, credit card details, credit information and credit eligibility information about your credit history and credit worthiness.

How we collect and hold personal information

We aim to collect personal information only directly from you, unless it is unreasonable or impracticable for us to do so. For example, we collect personal information from you or about you from letters, emails, application forms and contracts that you submit to us, telephone calls with us, and from your activity on our website.

However, in some instances we may receive personal information about you from third parties, such as associated businesses and referrers.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

Why we collect, hold, use and disclose personal information

NSK will only collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for the primary purpose of us carrying out our business functions and activities. For example, we collect, hold, use and

disclose your personal information as necessary to provide our goods and services to you or your organisation.

We may collect sensitive information from you or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. In all other situations, we will specifically seek your consent.

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction you have entered into, or provide the goods and services that you or your organisation have contracted us to provide.

We also collect, hold, use and disclose your personal information for related purposes that you would reasonably expect, such as our administrative and accounting functions, fraud checks, providing you with information about other goods and services offered by us, marketing and promotions, surveys and feedback, warranty work, newsletter communications, statistical collation and website traffic analysis.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

Where we use your personal information for marketing and promotional communications, you can opt out at any time by notifying us. Opt out procedures are also included in our marketing communications.

We may also disclose your personal information to third parties (including government departments, licensing authorities and enforcement bodies) where required or permitted by law.

Quality and Accuracy of Personal Information

NSK takes all reasonable steps to ensure the personal information we collect, use, hold and disclose is accurate, complete, up to date and relevant. We do this by:

- verifying the accuracy, completeness and relevance of personal information when it is collected; and
- maintaining the accuracy, currency, completeness and relevance of the personal information we hold by having procedures in place for dealing with and responding to requests for access to, and correction of, the personal information held about you

To assist us to keep our records up-to-date, please notify us aus-privacy@nsk.com of any changes to your personal information.

How we hold and store personal information

NSK will take reasonable steps to ensure the personal information we hold is protected from misuse and loss, and from unauthorised access, modification or disclosure. We will do this through:

- data held and stored on paper is stored in lockable storage facilities ;
- data held and stored electronically is protected by appropriate security measures including encryption, firewall and password protection;
- data held and stored "in the cloud" is protected by internal and external firewalls, limited access via file passwords, and files designated read-only or no access. We also require our IT contractors and other third parties to implement privacy safeguards;
- data stored or archived off-site is contained within secure facilities. We also require our storage contractors to implement privacy safeguards;

- where we disclose personal information to third parties (including contractors and affiliated businesses located locally and overseas), our contractual arrangements with them include specific privacy requirements;
- the maintenance of appropriate physical security measures including secured entry and monitored alarms for NSK's offices and facilities;
- restricting employee access to personal information on a "need to know" basis; and
- NSK's staff receive regular training on privacy procedures.

Destruction and De-identification

We will retain your personal information whilst it is required for any of our business functions, or for any other lawful purpose.

We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed:

- Paper records are shredded or sent for secure destruction.
- Electronic records deleted from all locations, to the best of our ability, or encrypted and/or placed beyond use

Access and Correction

Upon request, NSK will provide individuals with access to or a correction of their personal information. In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why. Such exceptions apply generally as follows:

- where providing access would pose a serious threat to the life or health of any individual;
- where providing access would have an unreasonable impact on the privacy of another individual;
- for personal information, the request for access is frivolous or vexatious;
- where there are considerations with regard to legal proceedings which are underway, being investigated or anticipated;
- where providing access would be unlawful.

Any request for access made to NSK is to be made in writing and must contain the appropriate proof of identity.

For requests for access to personal information, access will be provided within 14 days for simple requests and 30 days for more complicated requests. If a request for access is refused, the individual will be advised in writing, and the same timeframes will apply.

NSK may charge an individual for providing them with access. Should such a charge be levied for access to personal information it will be done so on a "cost recovery basis" only. If possible, individuals will be informed at the time of making a request for access if a charge will be applied and an estimation of those charges.

If an individual identifies that the information NSK holds on them is inaccurate, incomplete, misleading or not up to date, they may request that information be corrected. NSK will then make all reasonable effort to correct the information. Should we not be willing to correct the information, written reasons for refusal will be provided to the individual. In such a circumstance the individual may request an appropriate notation be appended to the information, which was sought to be corrected.

For further information please contact us. Contact information can be found below.

Overseas Disclosure

Our business is affiliated with other businesses located in Japan, Argentina, Brazil, Canada, China, France, Germany, India, Indonesia, Italy, Korea, Latin America, Malaysia, Mexico, Netherlands, New Zealand, Nordic, Peru, Philippines, Poland, Russia, Singapore, South Africa, Spain, Taiwan, Thailand, Turkey, United Arab Emirates, United Kingdom, United States of America and Vietnam. In the course of doing business with you, we are likely to disclose some of your personal information to our affiliated businesses. NSK will not disclose your personal information to an organisation or individual outside Australia unless:

- it is necessary to complete the transaction you have entered into; and
- you have provided consent; or
- we believe on reasonable grounds that the overseas recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- it is otherwise permitted by law.

Complaint Resolution

Should an individual, or their authorised or legal representative, have a complaint regarding our privacy practices or wish to make a complaint about how their personal information has been managed they should in the first instance contact NSK's Privacy Officer on +61 3 9765 4400. Any complaints received will be handled in accordance with our Privacy Complaints Policy.

Contact

Privacy Officer
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100 Logis Boulevard
Dandenong South VIC 3175
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