

Futuris Privacy Policy

[policy statement and objectives]

This Privacy Policy is intended to provide a general overview of the Futuris Group's policies in respect of the handling of your personal information. Your "personal information" is any information or opinion about you that is capable of identifying you.

This Policy is intended to cover most personal information handled by the Futuris Group, but is not exhaustive. If you have any queries about our management of your personal information, you are encouraged to contact Futuris for further information.

[policy scope]

This policy applies to the Futuris Group of businesses.

[definitions]

APPs - Australian Privacy Principles

Futuris Group means Futuris Automotive Interiors Holdings Pty Ltd and its Related Entities.

Personal information - information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Related Entities has the same meaning as defined in the *Corporations Act* (2001) Cth.

Sensitive information - includes information or an opinion about, amongst other things, an individual's racial or ethnic origin; political opinions; or religious beliefs or affiliations; or philosophical beliefs; or sexual orientation or practices; or criminal record; or health information.

[policy]

[the privacy act]

In Australia, Futuris Automotive Interiors Holdings Pty Ltd is an "organisation" for the purposes of the Privacy Act 1988 (Act), and is subject to the Australian Privacy Principles contained in the Act. Accordingly, this is an APP Privacy Policy.

Futuris has adopted this APP Privacy Policy to ensure that we handle personal information in accordance with the Australian Privacy Principles set out in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth).

Futuris will maintain and regularly review this APP Privacy Policy and intends to comply with the Australian Privacy Principles as far as is reasonably practical in the circumstances of managing its business.

This Policy will be made available on our website. You may also request a printed copy from one of our branches, which will be provided at no charge.

A reference to "we" "our" or "us" in this Privacy Policy is a reference to the Futuris Group where appropriate.

This APP Privacy Policy will be divided into five parts to reflect the different stages of the personal information management life-cycle, in line with the APPs.

[part 1 - consideration of personal information privacy]**[app 1 - open and transparent management of personal information]**

We will collect your personal information directly from you whenever possible, and will limit the personal information we collect to that which is necessary for our functions or activities. When collecting personal information (or as soon as reasonably practicable afterwards), we will endeavour to make you aware of the purposes for which the information is being collected by us, the organisations to which we would usually disclose your information, and any consequences for you if you fail to provide any information that is requested by us.

[app 2 - anonymity and pseudonymity]

Futuris will allow its customers to transact with it anonymously or by using a pseudonym, wherever that is reasonable and practicable.

However, this will not be possible if Futuris is required or authorised by law or other instrument to deal with people who have been appropriately identified; or where it is impracticable for us to deal with individuals who have not identified themselves or who would prefer to use a pseudonym.

[part 2 - collection of personal information]**[app 3 - collection of solicited personal information]**

Futuris will only collect personal information from you if it is reasonably necessary to provide goods or services to you or undertake ancillary functions for you. Futuris will only collect personal information for the purposes for which we advised you we were collecting it for or a related purpose which would reasonably be expected or otherwise with your permission.

Futuris will generally not be required to collect sensitive information about you. Futuris will only do so if it is considered reasonably necessary for us to collect such information for us to perform our functions or activities and you consent, or collection is required by law.

[app 4 - dealing with unsolicited personal information]

If Futuris happens to receive personal information about you from a source other than you, or it is information provided by you which we did not request, Futuris undertakes to determine, within a reasonable period, if we could have requested such personal information under APP3. If this is the case we may then use, and treat, that information in the same manner as if we had collected it under APP 3. If Futuris determines that we could not have collected the information under APP 3, we will undertake to destroy or de-identify that information, within a reasonable period.

[app 5 - notification of the collection of personal information]

When Futuris is collecting personal information about you, we will make it clear to you, either at or before the time, or as soon as practicable afterwards, why we are collecting such information. This is particularly relevant if we are collecting personal information about you from someone other than yourself. We will also make it clear to you if we are required to collect such information by reason of a law or some other legal instrument; why we are collecting such information and any potential consequences for you if we do not collect such information.

[part 3 - dealing with personal information]**[app 6 - use or disclosure of personal information]**

Futuris collects personal information from you for a specific reason as described in APP3. This is referred to as the primary purpose. Futuris agrees to not use or disclose this information for a

secondary purpose unless you consent to us doing so, or under the circumstances involved we believe you would reasonably expect Futuris to use or disclose the information for a secondary purpose and that that secondary purpose is related to the primary purpose.

In the unlikely event that we hold sensitive information about you, we will only disclose or use that information with your consent or if the use or disclosure is directly related to the primary purpose. Futuris will also disclose your personal information or sensitive information if we are required to do so by law or a court / tribunal order; or if Futuris reasonably believes that the use or disclosure of the information is reasonably necessary for an enforcement related activity or on behalf of an enforcement body, in which case we will make a written note of the use or disclosure.

This principle does not apply to direct marketing activities, which are discussed in APP 7 below.

[app 7 - direct marketing]

Futuris will not use any personal information we hold on you for the purpose of direct marketing.

[app 8 - cross-border disclosure of personal information]

Futuris will only transfer personal information about an individual to someone (other than a member of the Futuris Group or the individual) who is in a foreign country if we reasonably believe that the recipient of the information is subject to a law or binding scheme substantially similar to the Australian Privacy Principles and there are mechanisms that can be used to take action or enforce those laws or scheme. Futuris may also transfer the personal information if you specifically consent to us doing so, or we are required to do so under Australian law or an order of a court or tribunal. Otherwise, Futuris will take reasonable steps under the circumstances to ensure that the overseas recipient does not breach the Australian Privacy Principles (apart from APP 1).

Futuris advises that information is stored domestically within Australia, and may also be stored on servers in other countries where Futuris operates, namely, China, Thailand and the United States of America. Futuris has been careful to ensure that appropriate levels of security are in place to ensure the security and integrity of the data, as well as systems and processes are adequate to ensure access to our servers is appropriately managed.

We may also from time to time store or back-up some of your personal information on servers located in other countries (i.e. in the so-called 'cloud') for reasons of efficiency. We will take all reasonable steps to ensure that any personal information we provide to any overseas party is treated appropriately.

[app 9 - adoption, use or disclosure of government related identifiers]

As a general practice, Futuris does not use government related identifiers. Futuris will not use or disclose a government related identifier unless the use or disclosure of the identifier is: reasonably necessary for us to be able to verify your identity; reasonably necessary for us to fulfil any obligations we may have to a government agency or the State or Territory; required or authorised by or under an Australian law or a court or tribunal. We may use or disclose such an identifier if it is reasonably necessary for an enforcement related activity by or on behalf of an enforcement body. We may also use or disclose a government related identifier related to you if we are allowed or required by law or regulation to do so.

[part 4 - integrity of personal information]

[app 10 - quality of personal information]

Futuris will take all steps reasonable in the circumstances to ensure that the personal information we collect from you is accurate, up to date and complete. Where we collect information from you directly, we rely on you to supply accurate information and we may not consider that further steps are required. Futuris will also ensure that all steps reasonable under the circumstances to ensure

that the personal information we use or disclose is, when considered in relation to the purpose for which we are using or disclosing the information, accurate, up to date, complete and relevant.

[app 11 - security of personal information]

Futuris will take all steps reasonable under the circumstances to protect your personal information from misuse, interference, loss; and unauthorised access, modification or disclosure. If we no longer require to hold such personal information, we will take all reasonable steps under the circumstances to destroy or de-identify the information. However, we may retain documents that contain personal information in accordance with document retention practices.

[part 5 - access to, and correction of, personal information]

[app 12 - access to personal information]

Futuris will allow you access to any personal information we may hold on you unless there are lawful reasons to refuse you access.

For example, we may refuse access if we reasonably believe under the circumstances that doing so would: pose serious threat to the life, health and safety to any individual, or to public health and safety; have an unreasonable impact on the privacy of others; or that we consider the request as frivolous or vexatious. We will also not release the information if it relates: to existing or anticipated legal proceedings between Futuris and you, and would be protected by legal professional privilege; any potential negotiations between Futuris and you would be prejudiced or; it is illegal to release the information, or denying access is ordered by a court or tribunal.

If Futuris reasonably suspects that you are participating in an unlawful activity or serious misconduct in relation to our functions or activities and giving you access to the information would be likely to prejudice our position, Futuris will not release the information to you. We will also not release such information to you if doing so would reveal information that is commercially sensitive to us; or releasing the information would be likely to prejudice any enforcement related activity we may be conducting on behalf of an enforcement body.

If Futuris is refusing to grant access to personal information for any of the above reasons or refusing access in the manner that you have requested, we will consider if there is any way in which we can release the information including the releasing of the information via a mutually agreed third party. If Futuris still considers that we cannot release the information we will provide you with reasons as to why we consider we cannot release the information involved.

If Futuris is in a position to release the personal information we will do so within a reasonable time after receiving your request and in the manner requested by you, if it is reasonable and practicable for us to do so. We may charge a reasonable fee for giving access to the information.

[app 13 - correction of personal information]

If Futuris determines that personal information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, or you request us to correct the information, we will take all such steps as are reasonable in the circumstances to correct the information we hold, after considering the reason why we hold the information, and to make sure it is accurate, up to date, complete, relevant and not misleading. If we had disclosed the original information to a third party or you request us to advise another party we will take all reasonable steps to update that other party unless it is impracticable or unlawful to do so.

If we refuse to update or correct the information held, we will provide you with the reasons why, how you can complain about our refusal and any other matter we may be required to advise you about in the circumstances. If we have refused to update personal information held, you may request we associate a statement from you, with the information held, that you believe that the

information held is inaccurate, out of date, incomplete, irrelevant or misleading. We will then take all reasonable steps under the circumstances to associate any such statement.

If Futuris receives a request from you to update personal information held by us we will respond to that request within a reasonable period of time after receiving the request. Futuris will not charge for your request, the correction of information.

[changes]

We reserve the right to amend this Privacy Policy at any time. You may obtain a copy of the current version of the Privacy Policy by contacting us.

[enquiries, requests, complaints, breaches]

Enquiries regarding this APP Privacy Policy or the personal information Futuris may hold on you, should be addressed with the Privacy Officer, whose contact details are below.

If you think your personal information, held by Futuris, may have been compromised in any way or you have any other Privacy related complaints or issues, you should also raise the matter with the Privacy Officer.

Futuris will ensure your claims are investigated and a formal response will be provided to you, within a reasonable time, considering the circumstances of your claims. If any corrective action is determined to be required, as a result of that investigation, Futuris will take all reasonable steps to rectify the situation and advise you of such, again within a reasonable time considering the circumstances.

[further information]

You may contact us if you require further information about the ways we manage your personal information.

FUTURIS PRIVACY OFFICER IS OUR CHIEF FINANCIAL OFFICER

80 Turner Street

PORT MELBOURNE VIC 3207

Email - privacy@futurisgroup.com

Phone - (03) 9644 4399