

# RPM – Privacy Policy

## 1. Protecting your privacy

The RPMGlobal group of companies worldwide are ultimately controlled by RPMGlobal Holdings Limited (ABN 17 010 672 321) (**RPM**), a company incorporated and operating under the laws of Australia and having its principal place of business at Level 14, 310 Ann Street, Brisbane, Queensland, Australia 4000.

RPM is committed to protecting the privacy and personal information of all of its customers, suppliers and other stakeholders. RPM respects your preferences regarding the collection and use of your personal information and the following policy sets out how RPM collects, stores, uses and discloses personal information provided to RPM.

RPM as a publicly listed company on the Australian Stock Exchange (ASX: RUL) is bound by the Privacy Act 1988 (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**) and is an APP Entity under the provisions of that Act.

As a provider of products and services worldwide, RPM may also be subject to the laws and regulations of other countries. To the extent required, this policy shall be read subject to and in accordance with the mandatory provisions of those additional laws to which RPM may be obligated to comply..

This privacy policy applies to the information collected by RPM (including any and all subsidiary companies of RPM), in its dealings with you including but not limited to through the RPM Website and/or RPM Store and/or in person.

## 2. What personal information does RPM collect and store?

When you visit our website or request or receive products or services (**RPM Products or Services**) from us, RPM may collect and hold certain data which may include personal information from you which assists us in managing our relationship with you.

This personal information may be collected from you, and subsequently held by RPM, as a direct or indirect result of RPM's dealings with you including but not limited to during the provision of RPM Products or Services to you or following referrals of third parties.

The personal information we collect and hold may include:

- your name, company, title or position and contact details (such as email address, phone number, postal address and street address);
- software credentials including your username and password, machine identification details and similar information used for authentication and account access and for software maintenance and support;
- demographic information and location data, such as your country, preferred language, post code (or ZIP), age, gender, preferences, interests and favourites;
- if you choose to make a purchase of RPM Products or Services in the RPM Store or directly from RPM, we may process additional information, such as your credit card number, expiry date and billing details and address and will also collect information in respect of the RPM Products and Services you purchase from us;
- information relating to your visit to the RPM Website and/or RPM Store, including for example, we may use web analytics tools to retrieve information from your browser, including the site you came from, the search engine(s) and the keywords you used to find the RPM Website and/or RPM Store, the pages you view within the RPM Website and/or RPM Store, your browser add-ons, and your browser's width and height. Additionally, we may collect and hold certain standard information that your browser sends to every web site you visit, such as your IP address, browser type and language, access times and referring web site addresses. When you use our website we may also collect and hold information from your browser, such as language choice, to improve your customer experience, for example by making the RPM Website and/or RPM Store accessible to you in your preferred language where possible; and
- software analytics information as further detailed below.

Together the above information is known collectively in this policy as your **Personal Information**.

## 3. Software Analytics

Users of RPM Software and/or recipients of RPM Services may be requested at the time of installation of that Software (or an upgrade or new release of that Software) or receipt of those Services whether they wish to assist RPM to improve its products and services by sending us anonymous usage data about how you are using the Software and/or services (**RPM Software Analytics**).

By installing and using RPM Software and by choosing not to 'opt out' from RPM Software Analytics either at the time of installation or subsequently at any point by not 'opting-out', you are agreeing to and are granting RPM the right and permission to collect, maintain, process and use analytics data related to your use of our Software.

For the purpose of the RPM Software Analytics program, RPM may rely on third party analytics services to collect and process this data and such data is stored and processed on servers located in Europe and the USA.

You can opt in or out of the RPM Software Analytics program at any time from the Software "about box" or by emailing [privacypolicy@rpmglobal.com](mailto:privacypolicy@rpmglobal.com).

## 4. How does RPM access, store, process, use, transfer and disclose personal information and what is it used for?

Your information is provided to RPM throughout your dealings with RPM as a recipient or potential recipient of RPM software and/or Services or by engaging with RPM as a supplier, partner or service provider to RPM. Both Personal Information and non-personal information may be collected by RPM through your direct interactions with us such as entering into contracts with RPM or filling out forms, sales enquiries and other transactions, publicly available data from third parties such as data from marketing opt-in lists and data aggregators and from automated interactions such as RPM's Software Analytics program or from website cookies, URL's and tools.

The information collected and held by RPM may be used and disclosed by RPM for purposes such as:

- engaging in new transactions with you;
- providing support or other services to you in accordance with fulfilling our contractual obligations to provide RPM software, technical services, advisory services and/or training services to you;
- continually improving the RPM licensed software, annual maintenance and support services, consulting services and/or training services for you;
- with respect to RPM Software Analytics program, the information collected can assist RPM with analysis about software bugs and crashes, analysis on most used software features, provision of in-app messaging with the latest product news and automatic checks for the latest software updates so RPM can let you know when they are available;
- administering our relationship with you, providing RPM Products or Services including in respect of any subscription based software and services;
- verifying your identify and entitlement to products and services when you contact RPM including when RPM provides a response to any customer or supplier enquiries;
- processing and responding to investor enquiries;
- processing applications for employment;
- business development including sending marketing releases, publications, and details of training events;
- meeting legal or other regulatory obligations imposed on us;
- auditing usage of our websites;
- developing, customising, enhancing and operating the RPM Website and/or RPM Store and to carry out the transaction(s) you have requested or authorised;
- provide customer support for any RPM Products or Services provided to you;
- respond to questions or complaints;
- to conduct customer surveys;
- to detect and prevent fraud;
- providing you with any newsletter, product updates or technical alerts relating to any RPM products or services or in respect of any marketing communications and information on new products or services;
- solicit your opinion or feedback, provide opportunities for you to test software;

- on the basis of our legitimate interest in the effective delivery of our products, services and communications to you as well as to our other customers and partners, in order to
  - communicate commercial promotions and provide quotes for our products and services;
  - research and implement product improvements and product updates;
  - evaluate and improve the performance and quality of our products, services and websites;
  - provide you with a customized experience when you visit our websites;
  - allow interoperability within our applications;
  - secure our systems and applications;
  - allow for the provisioning of services;
  - enforce our legal rights; and
  - share your data with partners for sales conversions and lead generation.
- to provide a more effective customer service, improve the RPM Website and/or RPM Store; and
- to provide you with important information about the RPM Products and Services that you are using, including critical updates and notifications.

Occasionally we may use personal information to provide you with information about other RPM Products and Services together with events and promotions that we believe may be of benefit to you. If you prefer not to receive these updates please email us at [privacypolicy@rpmglobal.com](mailto:privacypolicy@rpmglobal.com) and put “unsubscribe” in the subject line together with the name of the publication you wish to unsubscribe from. Our marketing communications will also include an “unsubscribe” link.

We may access or disclose information about you, including the content of your communications, in order to: (a) comply with the law, ASX listing rule requirements or respond to lawful requests or legal process; (b) protect the rights or property of RPM or our customers; or (c) act on a good faith belief that such access or disclosure is necessary to protect the personal safety of RPM staff, customers or the public. We may also disclose personal information as otherwise permitted by law and as part of a corporate transaction such as a merger or sale of assets.

RPM is a global company and as such we may be required to process data in many countries. To conduct our business, and in accordance with this statement, you acknowledge that irrespective of your location and the origin of the Personal Data, RPM may store, transfer or process your Personal Data in Australia or any other country/region in which RPM or its subsidiaries, or authorised service providers maintain facilities. Outside of Australia these locations include Brazil, Canada, Chile, China, Colombia, Hong Kong, Indonesia, Kazakhstan, Mongolia, Russia, South Africa, Turkey, USA and India. For the purpose of the RPM Software Analytics program, RPM may rely on third party analytics services to collect and process this data and such data is stored and processed on servers located in Europe and the USA. All transfers will occur in compliance with data transfer requirements of applicable laws and regulations.

Where Personal Data originating from the EU is transferred to RPM entities or to third-party vendors engaged by RPM to process such Personal Data on our behalf who are located in countries that are not recognized by the EU as offering an adequate level of Personal Data protection, such transfers are covered by alternate appropriate contractual and security safeguards.

In the process of continuing to develop our business, we may also occasionally acquire subsidiaries or other business entities. As a result of such transactions, and for maintaining a continued relationship with you, we may transfer your Personal Data to an acquired and related affiliate. If we are involved in a reorganization, merger, acquisition or sale of our assets, your Personal Data may be transferred as part of that transaction. We will notify you of any such deal and outline your choices in that event.

Except as otherwise described in this statement or with your permission, Personal Data you provide to RPM will not be shared outside of RPM and its controlled subsidiaries and affiliates and approved business partners under confidentiality obligations.

RPM stores your personal information in different ways, including in paper and in electronic form. RPM takes security of your personal information very seriously and uses a variety of security procedures in our RPM Website and RPM Store to help protect personal information from unauthorised access, use, or disclosure.

We may use cookies on the RPM Website and/or RPM Store.

## 5. How do we protect personal information

RPM takes reasonable and appropriate technical, compliance, administrative and physical security and risk mitigation processes and safeguards that are designed in accordance with applicable laws to protect any Personal Information stored by RPM from any loss, misuse, unauthorised access, disclosure, alteration or destruction.

Protection mechanisms include (i) physical safeguards including locked filing cabinets and secure document destruction and (ii) technical safeguards including user authentication, network and data monitoring and other appropriate security measures across the RPM group.

RPM takes reasonable measures to prevent Personal Information breaches. If these do occur, we have a process in place to take swift action within our responsibilities and in accordance with any mandatory breach notification requirements at law.

## 6. Access to and correction of personal information

You have a right to request access to Personal Information held by RPM and to request its correction.

You may request to review, correct, update, suppress, or otherwise modify any of your Personal Information that you have previously provided to us through RPM's business partners, or object to the use or processing of such Personal Information by us.

If you require any changes please contact us using the details in the contact information section below.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information that you have provided to us.

While the majority of questions and issues related to access can be handled quickly, complex requests may take more research and time. In such cases, issues will be addressed, or you will be contacted regarding the nature of the problem and appropriate next steps.

RPM will retain your Personal Information for as long as your account with RPM is active; as needed to provide you products or services; as needed for the purposes outlined in this policy or at the time of collection; as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements; or to the extent permitted by law.

## 7. Agreement to terms of privacy policy, right to changes and withdrawal of consent

By using the RPM Website, RPM Store, RPM Software Analytics and/or providing information to us, you consent, accept and agree to the collection and use of your personal information for the purposes described in this policy. In circumstances where it is not practical or possible for you to access this policy on RPM's website, RPM will upon request made to the details in the contact information section below can provide you with a copy of this Privacy Policy.

Subject to applicable laws, you may have the right to request the following in respect of Personal Information stored or processed by RPM including:

- to ask us to provide you with information regarding the Personal Information we process concerning you;
- to rectify, update, delete or erase any Personal Information concerning you;
- to withdraw any consent you may have previously granted for RPM to use, access or process your Personal Information; and
- to lodge a privacy complaint with a supervisory authority, for example the Australian Privacy Commissioner if you are unhappy with the way that RPM has handled any Personal Information or the provisions of this policy;

As a company focused on serving the needs of businesses, RPM's websites, products and services are not directed to, nor do we knowingly collect data from, children and minors. If you believe that we have

mistakenly or unintentionally collected Personal Information of a child or minor please contact RPM using the details set out in the “contact information” section below.

We ask that you not send us, and you not share any sensitive Personal Information (e.g., government-issued or financial account numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, genetic, or biometric data, criminal background or trade union membership).

Whilst RPM acknowledges your right to deal anonymously or by pseudonym and to elect not to permit RPM to collect or store personal information, except in relation to general enquiries or complaints made to RPM on an anonymous basis, it is impractical for RPM to deal with you with respect to RPM Products or Services unless you identify yourself and provide the required personal information.

RPM reviews its policies regularly and occasionally may need to change or update them.

This Privacy policy was last reviewed and updated on **21 May 2018**.

## 8. GDPR

As an Australian business that offers goods and services to individuals in the European Union, RPM complies with the applicable requirements of EU General Data Protection Regulation (**GDPR**).

If you believe that your Personal Data was unduly collected or is unduly processed by RPM please refer to the “Contact information” section below.

## 9. Contact information

Requests relating to RPM’s Privacy policy including but not limited to complaints, details of alleged breaches of this policy or the APPs, requests for access to personal information or correction, complaints or concerns or for further information about how we process and treat personal information or comments or suggested improvements on RPM’s Privacy policy can be sent by email to: [privacypolicy@rpmglobal.com](mailto:privacypolicy@rpmglobal.com) or by writing to:

Company Secretary  
RPMGlobal Holdings Limited  
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Ph: +61 7 3100 7200