

INGAL *EPS* Privacy Policy

Privacy Statement

INGAL EPS a division of Industrial Galvanizers Corporation Pty Ltd ACN 000 545 415 (“INGAL EPS”) is committed to protecting your privacy and personal information when you deal with us.

INGAL EPS’s privacy policies support and comply with the Commonwealth legislation that deals with how businesses may collect, hold and use personal information about individuals. That legislation is the Privacy Act 1988 (the “Act”) and the Australian Privacy Principles introduced by that Act. INGAL EPS, as required by the Act (particularly Part IIIA) and the associated Australian Privacy Principles, has two privacy policies. The first is INGAL EPS’s Australian Privacy Principles Privacy Policy (“APP Privacy Policy”) which is INGAL EPS’s general privacy policy in respect of INGAL EPS’s general day to day involvement with the public and INGAL EPS’s customers and which is not related to INGAL EPS’s activities as a credit provider to commercial customers. INGAL EPS also has a Credit Reporting Privacy Policy. Insofar as INGAL EPS is a credit provider, it is also required to have a Credit Reporting Privacy Policy under Part IIIA of the Privacy Act.

Both the APP Privacy Policy and Credit Reporting Privacy Policy can be viewed by clicking on the links at the bottom of this statement.

INGAL EPS:

- will only collect personal information from you with your prior knowledge and consent. You can access our website and browse the site without disclosing personal information.
- will only use personal information provided by you for the purposes for which it was collected and INGAL EPS will not disclose your personal information to a third party, except when it is required to facilitate a service you have requested or as required by law.
- has implemented security technology, rules, measures and policies to protect the personal information under our control against: unauthorised access, improper use, alteration, unlawful or accidental destruction and accidental loss.
- will remove personal information from our systems where it is no longer required (except where archiving is required).

If you wish to view the personal information you have provided and/or which INGAL EPS holds about you, or you wish to comment on or obtain further information about our privacy policies, please contact our privacy officer:

INGAL EPS’s Privacy Officer
7 Activity Street, Acacia Ridge, QLD 4110

Telephone: 1800 623 302
Email: accounts@ingaleps.com.au

Introduction

1. This APP Privacy Policy of INGAL EPS a division of Industrial Galvanizers Corporation Pty Ltd ACN 000 545 415 (“INGAL EPS”) is INGAL EPS’s official privacy policy as required by the Privacy Act 1988 (the “Act”) and the Australian Privacy Principles (the “APPs”) and it applies to all personal information about individuals collected by INGAL EPS.
In this policy we explain how and why we collect personal information about individuals, how we use it, and what controls individuals have over our use of it.
2. INGAL EPS is committed to complying with Commonwealth legislation (the Act and the APPs) that deals with how businesses may collect, hold and use personal information about individuals and to protecting and safeguarding privacy of individuals when they deal with us.

Collection of information

3. Some information provided to us by clients, customers and other parties might be considered private or personal. However, without such information we would not be able to carry on our business activities and provide our services. We will only collect such personal information if it is necessary for one of our functions or activities. The kinds of personal information that INGAL EPS may collect and hold in respect of individuals includes:
 - o names;
 - o contact details and identification information;
 - o financial information, including information about transactions and trading history with INGAL EPS;
 - o information about credit history.
4. In particular, personal information is collected in the following situations by INGAL EPS:
 - o if an individual contacts INGAL EPS, we may keep a record of that communication or correspondence;
 - o If an individual submits an application or curriculum vitae or another form required to be completed by an individual to enable and/or facilitate services and or/employment to be provided by INGAL EPS;
 - o when applying for and/or establishing and/or accessing an account with us or ordering products or services from us;
 - o when conducting certain types of transactions such as cheque or credit card purchases or refunds;
 - o when an individual submits their contact details to be included on our mailing lists;
 - o when an order is placed with us to purchase goods or services we may require individuals to provide us with contact information including name, address, telephone number and/or email address and financial information (such as credit card details) for the purposes of processing and fulfilling such an order;
 - o INGAL EPS’s overseeing of various research projects;
 - o Where CCTV Footage is recorded at INGAL EPS’s Premises.

5. At or before the time the personal information about an individual is collected by us, we will take reasonable steps to ensure that the individual is made aware of who we are, the fact that the individual is able to gain access to the information held about the individual, the purpose of the collection, the type(s) of organisations to which we may usually disclose the information collected about the individual, any laws requiring the collection of the information and the main consequences if all or part of the information is not collected.
6. We usually collect personal information about individuals directly from the individual. However, sometimes we may need to collect personal information about individuals from third parties for the purposes described below in this policy. The circumstances in which we may need to do this include, for example, where we need information from a third party to assist us to process an application or an order (such as to verify information an individual has provided or to assess the individual's circumstances) or to assist us to locate or communicate with the individual.

Use of information collected and disclosure of personal information to others

7. We may use or disclose personal information held about an individual as permitted by law and for the business purposes for which it is collected (e.g. provision of our services, including administration of our services, notifications about changes to our services, record-keeping following termination of our services and technical maintenance) - that is, to carry on our business activities and provide services to our customers. We may also use such information about individuals for a purpose related to the primary purpose of collection and where the individual would reasonably expect that we would use the information in such a way. This information is only disclosed to persons outside our business in the circumstances set out in this policy or as otherwise notified at the time of collection of the information.
8. INGAL EPS's business purposes for which personal information is collected, used and disclosed may include:
 - o processing an application for employment form (including verifying a person's identity and employment history);
 - o processing an application or product order or service request (including verifying a person's identity for these purposes);
 - o managing our products and services or other relationships and arrangements, including processing receipts, payments and invoices;
 - o assessing and monitoring credit worthiness;
 - o detecting and preventing fraud and other risks to us and our customers;
 - o responding to inquiries about applications, accounts or other products, services or arrangements;
 - o understanding our customers' needs and developing and offering products and services to meet those needs;
 - o researching and developing our products and services and maintaining and developing our systems and infrastructure (including undertaking testing);
 - o ensuring workplace health and safety and productivity of individuals and employees at INGAL EPS's premises;
 - o dealing with complaints;
 - o meeting legal and regulatory requirements. Various Australian laws may expressly require us to collect/and or disclose personal information about

individuals, or we may need to do so in order to be able to comply with other obligations under those laws;

- enforcing our rights, including undertaking debt collection activities and legal proceedings.

9. In addition we are permitted to use or disclose personal information held about individuals:

- where the individual has consented to the use or disclosure and is related to the primary purpose for which the information was collected;
- where we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious, immediate threat to someone's health or safety or the public's health or safety;
- where we reasonably suspect that unlawful activity has been, is being or may be engaged in and the use or disclosure is a necessary part of our investigation or in reporting the matter to the relevant authorities;
- where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process);
- where we reasonably believe that the use or disclosure is necessary for prevention, investigation, prosecution and punishment of crimes or wrongdoings or the preparation for and conduct of proceedings before any court or tribunal or the implementation of the orders of a court or tribunal by or on behalf of an enforcement body.
- where a customer (being the individual or related to the individual) has requested a service to be provided by us and we are required to disclose the information to a third party in order to facilitate the provision of the service. In most, if not all cases, any such disclosure will be with the consent of the individual.

10. Third parties to whom we may disclose personal information about individuals in accordance with INGAL EPS's business purposes set out above may include:

- INGAL EPS's legal advisors;
- INGAL EPS's IT service providers;
- regulatory bodies in Australia;
- INGAL EPS's financial advisors;
- participants in financial and payment systems, such as other banks, credit providers, and credit card associations;
- guarantors and security providers associated with individuals;
- debt collectors;
- cloud information storage providers;
- other credit providers and trade suppliers.

Anonymity and Pseudonymity

11. Individuals have the option of dealing with INGAL EPS anonymously. However, this only applies where it is not impracticable for INGAL EPS to deal with individuals acting anonymously or under a pseudonym. For example, individuals making general enquiries of INGAL EPS may do so anonymously or under a pseudonym. However, if the dealing with INGAL EPS is for INGAL EPS to supply goods and services and/or to enter into contractual relations then it is impractical for individuals to deal with INGAL EPS on an anonymous basis or under a pseudonym.

Direct Marketing

12. As part of INGAL EPS's functions and business activities and to promote the services we can provide to our customers, INGAL EPS may use personal information that individuals have provided to INGAL EPS for the purposes of direct marketing. Direct marketing includes, but is not limited to, sending to our customers and other parties (including individuals) and/or contacting our customers (including individuals) in relation to promotions, information about INGAL EPS. Recipients of direct marketing are always able to opt out of receiving direct marketing communications by sending an email to INGAL EPS's Privacy Officer at: accounts@ingaleps.com.au. In any direct marketing communication we remind recipients of their right to opt out of receiving direct marketing communications.

Links

13. Our web site may contain links to other web sites and those third party web sites may collect personal information about individuals. We are not responsible for the privacy practices of other businesses or the content of web sites that are linked to our web site. INGAL EPS encourages users to be aware when they leave the site and to read the privacy statements of each and every web site that collects personally identifiable information.

Security and storage

14. INGAL EPS places a great importance on the security of all information associated with our customers and clients and others who deal with us. We have security measures in place to protect against the loss, misuse and alteration of personal information under our control. INGAL EPS takes all reasonable steps to protect personal information that is under INGAL EPS's control from misuse, interference, loss and/or unauthorised access, modification or disclosure. All personal information held is kept securely and that which is held electronically is held on secure servers in controlled facilities.

15. Personal information is de-identified or destroyed securely when no longer required by us.

16. INGAL EPS retains information provided to us including individuals' contact and financial and transactional information to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes. Such information is held securely, including on secure servers in controlled facilities.

17. Information stored within our computer systems or by our agents who provide electronic storage facilities can only be accessed by those entrusted with authority and computer network password sanctions. INGAL EPS has taken all reasonable steps to ensure the security of information stored with INGAL EPS's cloud service provider.

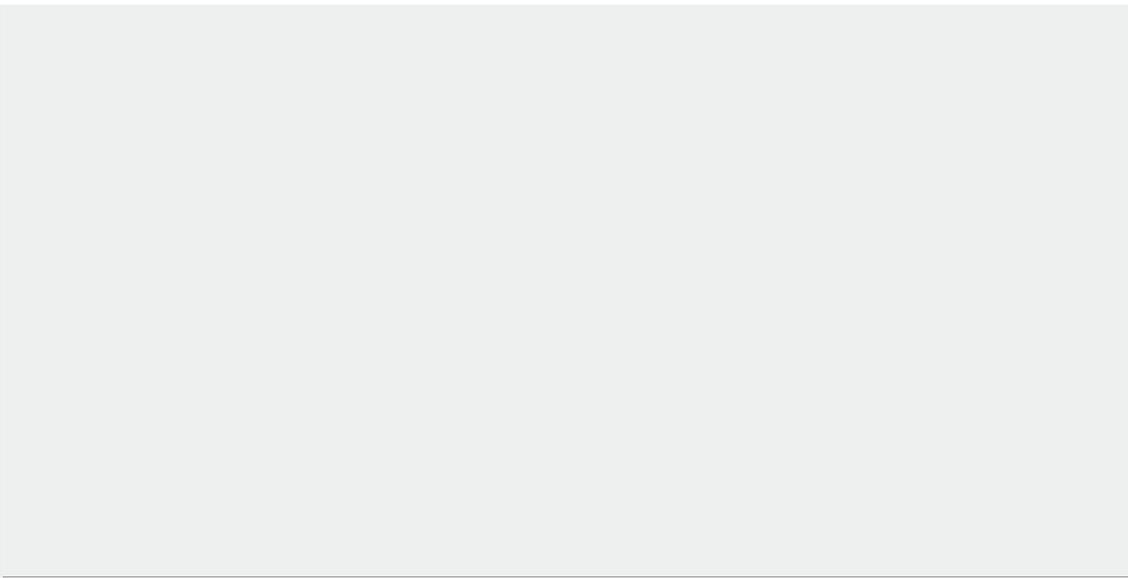
18. No data transmission over the Internet can be guaranteed to be absolutely secure. As a result, while we strive to protect users' personal information, INGAL EPS cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once INGAL EPS receives a transmission, we make every effort to ensure the security of such transmission on our systems.

Access to and correction of personal information

19. INGAL EPS is committed to and takes all reasonable steps in respect of maintaining accurate, timely, relevant, complete and appropriate information about our customers, clients and web-site users.
20. Any individual may request access to personal information about them held by INGAL EPS. Such a request for access to personal information is to be made to INGAL EPS's Privacy Officer:

INGAL EPS's Privacy Officer
7 Activity Street
Acacia Ridge, QLD 4110

Telephone: 1800 623 302
Email: accounts@ingaleps.com.au



Credit Reporting Privacy Policy

Introduction

1. This Credit Reporting Privacy Policy of INGAL EPS a division of Industrial Galvanizers Corporation Pty Ltd ACN 000 545 415 ("INGAL EPS") is INGAL EPS's official credit reporting privacy policy as required by the Privacy Act 1988 (the "Act") and particularly Part IIIA of that Act and the Credit Reporting Code (the "CR Code") and it applies to all credit information and credit eligibility information about individuals ("credit information") collected, held and used by INGAL EPS in its activities as a credit provider.

In this policy we explain how and why we collect credit information about individuals, how we use such information, and what controls individuals have over our collection and use of information about them. This policy is relevant to individuals who are current and former credit customers, as well as other individuals

that INGAL EPS deals with in connection with credit we provide to our credit customers (for instance, such individuals may be guarantors or directors of corporate customers).

2. INGAL EPS is committed to complying with Commonwealth legislation and regulations (the Act and the CR Code) governing privacy of credit information about individuals by credit providers and to protecting and safeguarding the privacy of individuals when they deal with us.

Collection of information and types of information collected

3. INGAL EPS collects, holds and uses various types of credit-related information about individuals, which information includes:
 - o identification information such as current and prior names and addresses, age, contact details and driver's licence number;
 - o applications for credit (including the name of each relevant credit provider), the type and amount of that credit and the fact INGAL EPS has accessed credit information to assess a relevant application;
 - o that INGAL EPS and other credit providers are or have been a provider of credit to an individual (or an entity associated with an individual) and the type, characteristics and maximum amount of credit that have been provided or will be provided;
 - o the date that any credit contract INGAL EPS or other credit providers have or had with an individual was entered into and the date that it comes to an end;
 - o payments owed to INGAL EPS or another credit provider, in connection with credit provided to an individual (or an entity associated with an individual) or in relation to which an individual is a guarantor (and, if there is subsequently paid any such overdue payment, the fact of that payment);
 - o whether in INGAL EPS's or another credit provider's opinion an individual has committed a serious credit infringement;
 - o whether an individual has entered into arrangements with INGAL EPS or other credit providers in connection with credit provided to the individual (or an entity associated with the individual);
 - o court proceedings information, personal insolvency information and credit-related publicly available information;
 - o scores, ratings, summaries, evaluations and other information relating to an individual's credit worthiness which is derived by INGAL EPS or its agents or by Credit Reporting Bodies ("CRB's") wholly or partly on the basis of the information above;
 - o certain administrative information relating to credit, such as account and customer numbers.

While the Act uses a variety of terms to refer to such information as referred to above, for ease of understanding and reading this policy, such information is referred to hereinafter as "credit information".

4. Credit information may be collected by INGAL EPS in a number of ways including:
 - o being provided by an individual directly to INGAL EPS or by persons acting on behalf of the individual (such as on applications or other forms);
 - o being provided by CRB's and/or other credit providers and/or trade suppliers with the consent of the individual;

- being information that is in the public domain;
- being information that is derived by INGAL EPS from an individual's usage and (where applicable) trade on and transactional history on any account (of the individual or of an entity associated with the individual) held with INGAL EPS.

How credit information is held

5. At or before the time any credit information is collected by INGAL EPS about an individual, we will take reasonable steps to ensure that the individual is made aware of who we are, the fact that the individual is able to gain access to the information held about the individual, the purpose of the collection, the type(s) of entities to which we usually disclose such information collected about the individuals, any laws requiring the collection of the information and the main consequences for the individual if all or part of the information is not collected.
6. INGAL EPS may hold credit information about an individual in physical form or in electronic form on our systems or the systems of INGAL EPS's IT service providers. The credit information INGAL EPS holds about individuals is protected by physical, electronic, and procedural safeguards and INGAL EPS also requires its service providers that hold and process such information on INGAL EPS's behalf to follow appropriate standards of security and confidentiality. Any credit information we collect from an individual or about an individual is kept securely and held on secure servers in controlled facilities.
7. INGAL EPS trains its staff and others who work for it on how to handle credit information appropriately and INGAL EPS restricts access to what is necessary for specific job functions.

Use of information collected and disclosure of personal information to others

8. INGAL EPS may, as permitted by law, collect, hold, use or disclose credit information held about an individual for the purposes for which such information is collected. These purposes include:
 - to form decisions as to whether to provide an individual, or an entity associated with an individual, with credit or to accept an individual as a guarantor;
 - to make assessments relating to an individual's credit worthiness which are used in INGAL EPS's ongoing decision-making processes regarding provision of credit and the amount of such credit;
 - to participate in the exchange of credit information with other credit providers including obtaining from and providing information to CRB's and/or other credit providers and/or trade suppliers as permitted by Part IIIA of the Act and the CR Code;
 - to assist an individual or entity associated with the individual to avoid defaulting on credit-related obligations to INGAL EPS or other credit providers;
 - to undertake debt recovery and enforcement activities, including in relation to guarantors, and to deal with serious credit infringements;
 - to deal with complaints and meet legal and regulatory requirements; and
 - to assist other credit providers to do the same.

(Some credit information may only be used or disclosed under the Act for some of the above purposes or in some particular circumstances. Certain such particular circumstances are set out in clause 9 below.)

9. Generally, INGAL EPS will be permitted to use or disclose credit information held about an individual where the individual has consented to the use or disclosure. INGAL EPS may disclose credit information about an individual to a CRB and/or to other credit providers for such purposes as set out at clause 8 above as permitted by the Act. For example, INGAL EPS may be permitted to disclose credit information to a CRB in such circumstances as where the individual has consented to the disclosure or where the individual has failed to meet payment obligations in relation to credit provided by INGAL EPS or if the individual has committed a serious credit infringement. Similarly, INGAL EPS will generally be permitted to disclose credit information to another credit provider about an individual where the individual has consented to such disclosure.
10. CRB's may include credit information provided by INGAL EPS in reports provided to other credit providers to assist such other credit providers to assess the individual's credit worthiness. INGAL EPS shares credit information with the following CRB:
Veda
Verify Holdings Australia Ltd
Locked Bag 965, NORTH SYDNEY, NSW 2059
Email: info@verifcv.com.au
You are able to obtain a copy of Veda's credit reporting policies from their website. INGAL EPS may, in the future, disclose credit information to a CRB other than Veda, but prior to disclosing any credit information about individuals to any other CRB, INGAL EPS will amend its Credit Reporting Privacy Policy to set out the name and contact details of any such other CRB and will post a notification of the change to the Credit Reporting Privacy Policy on INGAL EPS's website.

Rights in relation to CRBs

11. Individuals have certain rights in respect of CRB's and the information a CRB holds about the individual and those rights include:
 - o Opting out of direct marketing pre-screenings. A CRB may use an individual's credit information to assist a credit provider to market to that individual by pre-screening the individual for direct marketing by the credit provider. This process is known as a "pre-screening". If an individual does not want a CRB (including the CRB listed above) to use that individual's information for the purpose of pre-screening, the individual has the right under the Act to contact the CRB to request that they exclude the individual from such processes.
 - o If an individual is a victim of fraud (including identity-related fraud). An individual is entitled under the Act to request that a CRB not use or disclose credit reporting information they hold about the individual in circumstances where the individual reasonably believes that they have been or are likely to be a victim of fraud, including identity-related fraud. The period while this applies is called a "ban period". An individual can make such a request to any CRB, including those listed above.

Direct Marketing

12. As part of INGAL EPS's functions and business activities and to promote the services, INGAL EPS can provide to its customers, including in respect of INGAL EPS's credit-related activities, INGAL EPS may be permitted to use personal information about individuals that individuals have provided to INGAL EPS for the purposes of direct marketing. Direct marketing includes, but is not limited to, sending to and/or contacting individuals in relation to promotions, information about INGAL EPS. All recipients, including individuals, can opt out of receiving direct marketing communications by sending an email to INGAL EPS's Privacy Officer at accounts@ingaleps.com.au. In any direct marketing communication we remind recipients of their right to opt out of receiving direct marketing communications. Moreover, as a general rule, a credit provider such as INGAL EPS is not permitted to disclose to others credit information about individuals for the purposes of direct marketing.

Anonymity and Pseudonymity

13. Individuals would generally have the option of dealing with INGAL EPS anonymously. However, this only applies where it is not impracticable for INGAL EPS to deal with individuals acting anonymously or under a pseudonym. For example, individuals making general enquiries of INGAL EPS may do so anonymously or under a pseudonym. However, if the dealing with INGAL EPS is for INGAL EPS to supply goods and services and/or to enter into contractual relations (such as a commercial credit account) with a customer that is the individual or is associated with the individual, then it is impractical for such individuals to deal with INGAL EPS on an anonymous basis or under a pseudonym.

Links

14. Our web site may contain links to other web sites and those third party web sites may collect personal information about individuals. We are not responsible for the privacy practices of other businesses or the content of web sites that are linked to our web site. INGAL EPS encourages users to be aware when they leave the site and to read the privacy statements of each and every web site that collects personally identifiable information.

Security and storage

15. INGAL EPS places a great importance on the security of all information associated with our customers, clients and contractors. We have security measures in place to protect against the loss, misuse and alteration of personal information (including credit information) under our control. INGAL EPS takes all reasonable steps to protect individuals' personal information that is under INGAL EPS's control from misuse, interference, loss and/or unauthorised access, modification or disclosure. All personal information (including credit information) held is kept securely and that which is held electronically is held on secure servers in controlled facilities.

16. Personal information (including credit information) is de-identified or destroyed securely when no longer required by us and no longer required to be held by us.

17. INGAL EPS retains information provided to us including individuals' contact and financial and transactional information to enable us to verify transactions and

- customer details and to retain adequate records for legal and accounting purposes. Such information is held securely, including on secure servers in controlled facilities.
18. No data transmission over the Internet can be guaranteed to be absolutely secure. As a result, whilst we strive to protect users' personal information (including credit information), INGAL EPS cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once INGAL EPS receives a transmission, we make every effort to ensure the security of such transmission on our systems.

Access to and correction of personal information

19. INGAL EPS is committed to and takes all reasonable steps in respect of maintaining accurate, timely, relevant, complete and appropriate information about our customers, clients and web-site users.
20. Any individual may request access to personal information (including credit information) about them held by INGAL EPS. Such a request for access to personal information is to be made to INGAL EPS's Privacy Officer:

INGAL EPS's Privacy Officer
7 Activity Street, Acacia Ridge, QLD 4110

Telephone: 1800 623 302
Email: accounts@ingaleps.com.au

21. Please note INGAL EPS does require that, as part of any request by an individual for access to personal information (including credit information), the individual verify their identity so that INGAL EPS may be satisfied that the request for access is being made by the individual concerned.
22. Please note that INGAL EPS is not required to give an individual access to credit information about them in circumstances where:
- giving access would be unlawful; or
 - denying access is required or authorised by or under an Australian law or a court/ tribunal order; or
 - giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body.
23. Inaccurate information will be corrected upon receiving advice to this effect. To ensure confidentiality, details of an individual's personal information (including credit information) will only be passed on to the individual if we are satisfied that the information relates to the individual. From time to time, and having regard to the purpose of the collection and use of personal information (including credit information) about individuals, we may contact individuals to seek confirmation that the personal information provided to us by the individual is accurate, up-to-date and complete.
24. If we refuse to provide an individual with access to their personal information (including credit information) or to correct the personal information (including credit information) held by us about them, then we will provide reasons for such refusal. Such reasons will set out the grounds for refusal, the mechanisms available to complain about the refusal and any other matters that are required by the Act.
25. INGAL EPS will respond to any requests for access or correction within a reasonable time of receipt of the request, but by no later than 30 days of the request being received.

Complaints

26. If an individual has a complaint that INGAL EPS has not complied with its obligations under the Act then any such complaint should be directed in the first instance to INGAL EPS's Privacy Officer at the contact details set out at clause 20 of this policy.
27. Upon receiving a complaint we will, within 7 days, give the complainant written notice acknowledging receipt of the complaint and setting out the process of how we will deal with it. Unless a longer time is agreed by the complainant, we will investigate the complaint and make a decision within 30 days of receipt of the complaint and communicate the decision to the complainant. We aim to resolve all complaints within 30 days of receipt. If we cannot resolve a complaint within 30 days we will notify the complainant of the reasons and specify a date when we expect a decision or resolution will be made and seek the complainant's agreement to extend the 30 period – if the complainant does not agree then we may not be able to resolve the complaint.
28. It may be necessary (and it may be required by the Act), in order to deal with a complaint, to consult with a credit reporting body or another credit provider. Further, if, while a complaint remains unresolved, we are disclosing information subject to the complaint to a third party, we may be required to advise the third party about the complaint.
29. If we find a complaint is justified we will resolve it and do what is required to rectify any breach. INGAL EPS is committed to fulfilling its obligations as an APP entity and a credit provider under the Act.
30. If a complainant is not satisfied with the outcome of INGAL EPS's internal complaints procedure in respect of INGAL EPS privacy practices then the complainant may refer their complaint to the Office of the Australian Information Commissioner ("OAIC"). The website for the OAIC is: www.oaic.gov.au.

Transfer of information overseas

31. INGAL EPS utilises local and overseas cloud services for the purpose of storing information. Your personal and/or sensitive information may be disclosed to an INGAL EPS cloud service provider for that purpose. While INGAL EPS's cloud service providers are located in such places as Australia and Singapore, the country location of those providers may periodically change. INGAL EPS may also from time to time be required to send your information overseas to other members of the Valmont Industries Inc. Group or related entities. You may obtain more information about any of those entities by contacting us.

Changes to Privacy Policy

32. If INGAL EPS decides to or is required to change this Credit Reporting Privacy Policy, we will notify of such amendments on our web site and post changes on our privacy policy page so that users may be aware of any such changes and how they may affect them. As such, please remember to refer back to INGAL EPS's privacy policy page regularly to check whether there are any amendments.

Contacting us

33. For further information regarding our privacy policies, please contact us at the following address:

E-mail: accounts@ingaleps.com.au

34. For more information on privacy legislation and the CR Code please visit the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

Complaints Handling Policy

Introduction

1. Objectives and purposes of Complaints Handling Policy.

INGAL EPS a division of Industrial Galvanizers Corporation Pty Ltd ACN 000 545 415 (“INGAL EPS”) is committed to delivering high quality products and services to those who deal with it. INGAL EPS is committed to understanding and responding to the needs and concerns of our customers and clients.

The aim of this policy is to provide guidance as to the manner in which INGAL EPS receives and handles complaints made to INGAL EPS in respect of INGAL EPS’s business activities and dealings with its customers and clients.

The objective of this policy is to assist INGAL EPS in dealing with and resolving complaints in an efficient, effective and professional manner.

2. Background

In creating this policy, INGAL EPS has sought to ensure that our procedures accord with relevant legal requirements and best practice. In particular, this policy has been created to satisfy the requirements of AS ISO 10002-2006 Customer Satisfaction – Guidelines for complaints handling in organisations.

3. What is a Complaint?

AS ISO 10002-2006, defines a complaint as follows:

“An expression of dissatisfaction made to an organisation, related to its products, or the complaints–handling process itself, where a response or resolution is explicitly or implicitly expected.”

INGAL EPS adopts that definition of “complaint” for the purposes of this policy.

Any person or entity who is dissatisfied with a product or service provided by INGAL

EPS for any reason, may contact us to complain. A complaint may be made in writing or verbally. Certain types of “complaints” may be by way of negative feedback, which may not require a resolution or any response. Whilst we acknowledge this type of feedback can be useful and valuable, this policy does not apply to such feedback as such feedback does not fall under the definition of a complaint as set out above.

Guiding principles for effective handling of complaints.

INGAL EPS abides by the guiding principles as set out at section 4 of AS ISO 10002-2006 for effective handling of complaints. The guiding principles set out at section 4 of AS ISO 10002-2006 are as follows:

Principle	Explanation of Principle
Visibility	Information about how and where to complain should be well publicised to customers, clients, INGAL EPS personnel and other interested parties. This policy is available on INGAL EPS’s website and also internally.
Accessibility	The complaints-handling process as outlined in this policy should be easily accessible to complainants and all relevant representatives of INGAL EPS. This policy is drawn in a manner that is easy to understand and sets out simply the process of making and resolving of complaints.
Responsiveness	Receipt of each complaint is acknowledged to the complainant immediately. Complaints will be addressed promptly in accordance with their urgency. Complaints will be handled in an efficient and effective manner and complainants will be treated courteously and kept informed of the process of the complaint through the complaints-handling process.
Objectivity	Each complaint will be addressed in an equitable, objective and unbiased manner through the complaints-handling process.
Charges	The complaints-handling process is free of charge to the complainant.
Confidentiality	Personally identifiable information concerning the complainant is actively protected from disclosure unless the complainant expressly consents to its disclosure.
Customer-focused approach	INGAL EPS is committed to adopting a customer-focused approach to dealing with complaints. We are open to feedback, including in respect of the form of complaints and we acknowledge the right of our customers and clients to complain.
Accountability	INGAL EPS and its employees accept responsibility for effective

complaints handling procedures, including being accountable for and reporting on the actions and decisions of INGAL EPS in respect to complaints handling.

Continual improvement

INGAL EPS is committed to continually improving its complaints-handling processes.

Complaints Handling

1. How may a complaint be made

Where possible, complaints should be made in writing so that the details of the complaint are clear and complete and so that we may more effectively deal with the complaint.

Complaints should be directed to:

INGAL EPS Complaint's Officer
7 Activity Street
Acacia Ridge, QLD 4110

Telephone: 1800 623 302
Email: qldsales@ingaleps.com.au

2. Information to be provided when making a complaint

When making a complaint, please provide the following information:

- Your Name, the organisation you are from (if applicable), your position and contact details;
- Your relationship with INGAL EPS;
- The name of any contact person at INGAL EPS;
- Details of the complaint (including when the conduct giving rise to the complaint occurred);
- Details of any persons or persons of INGAL EPS involved (if applicable);
- Copies of any documentation that supports the complaint.

3. Help with making a complaint

If you require any assistance in formulating or lodging a complaint, please contact the Complaints Officer at the contact details set out above.

4. Acknowledgment of complaint

We will acknowledge receipt of a complaint immediately upon receipt.

We will endeavor to resolve complaints within four (4) weeks of receiving the complaint. However, this may not be possible in all instances. Where time to deal with a complaint will exceed four (4) weeks, we will contact the complainant to inform of the reasons for the delay and indicate when we expect to be in a position to complete our review of the complaint.

5. Your rights in the complaints process

Complainants have the right to enquire as to the status of their complaint by

contacting the Complaints Officer or any other employee or representative of INGAL EPS who has been identified to the complainant as handling the complaint.

6. Responding to a complaint

Once we have reviewed a complaint, we will provide the complainant with a written response. If the complainant is dissatisfied with our response, the complainant has a right to ask for the response to be re-considered by the Complaints Officer. Such a request should be made in writing to the Complaints Officer and forwarded by post or email to the addresses provided above.

7. Further action

If a complainant remains dissatisfied with the manner in which the complaint has been handled, the complainant may have a right to refer the complaint to some other external resolution body.

Quality Assurance

Complaints will be analysed by our Complaints Officer at regular intervals to identify any recurring or systemic problems. If any such problems are identified, we will consider what actions we need to take to address any such problems.

Our complaints handling process will be reviewed periodically in order to enhance our delivery of efficient and effective outcomes in respect of complaints received.