

PRIVACY POLICY

CTO Industries Pty Ltd recognises the importance of protecting the privacy of personally identifiable information collected about our customers. For the purposes of this Privacy Statement, the word customers includes visitors to our web sites, subscribers to and users of our services, purchasers of our products and advertising customers. We are bound by the Australian Privacy Principles in the Privacy Act 1988 (Cth), as amended, in relation to the handling of personal information. Where appropriate we will handle personal information relying on the related bodies corporate exemption and the employee exemption in the Privacy Act.

PERSONAL INFORMATION

We collect personal information when we provide our services to you. Generally we will tell you why we are collecting information when we collect it and how we plan to use it or these things will be obvious when we collect the information. We usually collect personal information directly from you although sometimes we may use agents or service providers to do this for us. We may also acquire lists from other sources, both from other companies and from other public documents.

USE OF INFORMATION

We usually collect personal information such as your name, address, telephone number. When you are online, we collect information regarding the pages within our network which you visit and what you click on. As a general rule we do not collect sensitive information. However, if we do, it will usually be for the purposes of providing our goods or services and we will seek your consent to collect it. Sensitive information means information about a person's racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual preferences or practices; criminal record; health information and genetic information.

We use your information to provide our services to you, to fulfill administrative functions associated with these services, for example for billing purposes, to enter into contracts with you or third parties and for marketing and client relationship purposes. Any information that we collect in relation to your credit or debit card details is not kept by us after we use it. We do pass this information on to our financial institution and to our bill payment systems provider to deal with your credit or debt card in order to process your information for the purposes of payment to us for your advertising. When you make an online transaction to purchase our products we utilize the services of NAB Merchant Services and your financial information is given to them and not collected by us.

We may share your information with other companies which are related to CTO Industries, within and outside of Australia. We may also use your personally identifiable information to assist us in improving our products and services and we may also be in touch to let you know about goods, services, or promotions that may interest you.

Generally when we collect your information and it is used for a secondary purpose that use will be related to the primary purpose. We may use or disclose information as is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

At any time, you may notify us of your preference on this issue by contacting our privacy officer as set out at the end of this document. Please allow a reasonable time for your preference to be implemented.

USE BY THIRD PARTIES

CTO Industries may disclose your information to its service providers and contractors from time to time in Australia or overseas to help us to provide and market our goods and services to you. If we do this we generally require these parties to protect your information in the same way we do.

USE OF AGGRAGATE DATA

We may collect certain non-personal information to optimise our goods and services including our Web pages for your computer (e.g., the identity of your Internet browser, the type of operating system you use, your IP address and the domain name of your Internet service provider). We may use such non-personal information for internal purposes, including but not limited to improving the content of our sites. CTO Industries may use personally identifiable information in aggregate form to improve our goods and services including our Web sites and make them more responsive to the needs of our customers. This statistical compilation and analysis of information may also be used by CTO Industries or provided to others as a summary report for marketing, advertising or research purposes.

SECURITY

CTO Industries strives to ensure the security, integrity and privacy of personally identifiable information of our customers. We use a variety of physical and electronic security measures including restricting physical access to our offices and firewalls and secure databases to keep personal information secure from misuse, loss or unauthorised use or disclosure. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure.

ACCESS TO PERSONAL INFORMATION

You have a right to access most personal information we hold about you and if we deny access in some circumstances we will tell you why. To request access, please contact our privacy office as set out at the end of this document.

POSSIBLE DISCLOSURE TO OVERSEAS RECIPIENTS

CTO Industries uses several services that are located overseas, principally in the USA, all of which have Privacy Policies that have obligations to protect information in a substantially similar way as Australia and they have mechanisms that you can access to take action to enforce protection. CTO Industries uses Google Data analytics which does not collect your personal information. To learn more about how this works go to:

http://www.google.com.au/intl/en_uk/analytics/privacyoverview.html

UNSOLICITED PERSONAL INFORMATION

If CTO Industries receives information which we did not ask for we will determine whether we could have collected this information lawfully. If we determine that it could not then we will destroy it and de-identify it where it is lawful to do so.

PUBLIC INFORMATION

Any information posted on bulletin boards and/or communicated in chat areas becomes public information. While CTO Industries strives to protect and respect your privacy, we cannot guarantee the security of any information you disclose in a chat room or bulletin board.

COOKIES

Cookies are data that a Web site transfers to an individual's hard drive for record-keeping purposes. Cookies can facilitate a user's ongoing access to and use of a site. They allow us to track usage patterns and to compile data that can help us improve our content and target advertising. If you do not want information collected through the use of Cookies, there is a simple procedure in most browsers that allows you to deny or accept the Cookie feature. But you should note that Cookies may be necessary to provide you with features such as merchandise transactions or registered services.

ONLINE LINKS TO THIRD PARTY AND CO-BRANDED SITES

CTO Industries may establish relationships with business partners that allow visitors to our Internet sites to link directly to sites operated by these partners. Some of these sites may be "co-branded" with our logo; however, these sites may not be operated or maintained by or on our behalf. These sites may collect personal information from you that may be shared with us. This Privacy Statement will apply to any personal information we obtain in this manner. CTO Industries is not responsible for the content or practices of Web sites operated by third parties that are linked to our sites. These links are meant for the user's convenience only. Links to third party sites do not constitute sponsorship, endorsement or approval by CTO Industries of the content, policies or practices of those third party sites. Once you have left our site via such a link, you should check the applicable privacy policy of the third party site.

WHAT YOU SHOULD KNOW ABOUT INTERNET PRIVACY

Remember to close your browser when you have finished your user session. This is to ensure that others cannot access your personal information and correspondence if you share a computer with someone else or are using a computer in a public place like a library or Internet café. You as an individual are responsible for the security of and access to your own computer. Whenever you voluntarily disclose personal information over the Internet, this information can be collected and used by others. In short, if you post personal information in publicly accessible online forums, you may receive unsolicited messages from other parties in return. Ultimately, you are solely

responsible for maintaining the secrecy of your username and passwords and any account information. Please be careful and responsible whenever you are using the Internet.

FOR MORE INFORMATION

Please contact our Business Development Manager to ask for access to your information or if you have a complaint concerning your information privacy or if you would like more information about our approach to privacy.

613 8201 7880

sales@ctoindustries.com.au

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