	Document Type	Location	Doc. Type No & Version
	Policy	National	APAC-ALL-HR-POL-004
Issue Date	Emergent Cold Privacy Policy Statement (External)		
25/04/2019			


DOCUMENT APPROVALS

Raised By: General Manager HR Asia Pacific **Date:** 25/04/2019

Authorised By: President Asia Pacific **Date:** 25/04/2019

Distribution: Emergent Cold Global

Version	Issue Date	Details of Changes	Author
1	25 April 2019	Initial Draft	Rick Vine
2			
3			

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1 Privacy Policy Statement

Emergent Cold is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information. This Policy Statement is developed for our customers, suppliers and business partners.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information. It will form the basis of our privacy governance across all geographies of operation should a country we operate in not establish privacy guidelines separately to these. Each region may develop their own privacy policy and actions if preferred but this statement will serve as the minimum standard.

A copy of the Australian Privacy Principles may be obtained from the Emergent Cold (Australian Page) website or the website of The Office of the Australian Information Commissioner at www.aaic.gov.au

1.1 What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, phone and facsimile numbers.

This Personal Information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, via our website www.Emergentcold.com, your website or from other publicly available sources and from third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

1.2 Sensitive Information


Sensitive information is defined in the Australian Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

1.3 Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

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1.4 Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

1.5 Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure. We update and test our security technology on an ongoing basis.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

1.6 Access to your Personal Information

Customers, Suppliers and business partners may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Emergent Cold will not charge any fee for your access request. In order to protect your Personal Information, we may require identification from you before releasing the requested information.

1.7 Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

1.8 Statement Updates

This Statement may change from time to time and is available on our website.

1.9 Privacy Statement Complaints and Enquiries

If you have any queries or complaints about our Privacy Statement, please contact us at info@emergentcold.com

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