## **Privacy Policy**

Ashpri Holding Pty Ltd and its related companies (collectively Roller Smart Shutters, we, us, our) are committed to protecting the privacy of your personal information. We are bound by the *Privacy Act 1988 (Cth)* (Privacy Act) which sets out the standards of collecting, holding, using and disclosing your personal information. This Privacy Policy explains the way in which we handle your personal information, and the ways in which you can contact us about the personal information that we hold about you.

#### What is personal information?

"Personal information" is information or opinion (in recorded form or otherwise) about an identified, or reasonably identifiable, individual. This includes your name, your date of birth and your contact details, and may also include information about your purchases and other dealings with us.

#### **Collecting your personal information**

The personal information we collect from you depends on how you interact with us. Ashpri Holdings Pty Ltd may collect information in its capacity as a roller shutter manufacturer/installer We may collect information such as:

- your name and date of birth
- address and other contact details
- payment details
- information about your interactions with us
- to assist us in customising our interactions with you
- if you apply for employment with us, information relating to your application, and
- any other personal information that is reasonably necessary for the purpose of running our business

We will obtain this information through our communications and dealings with you, for example, when you participate in a competition we are running, or when you contact us by telephone, mail, email or through our website. Where it is not practicable to obtain personal information directly from you, we may collect it from third parties including your accountant.

#### Our purposes for handling personal information

We collect, hold, use and disclose your personal information:

- to contact you
- to deliver products and services to you
- to administer and manage our relationship with you
- to maintain our business records
- to provide you with information about products and services that may be of interest to you

#### Disclosing your personal information

We may disclose your personal information to our related companies, business partners, professional advisers (such as lawyers, accountants or auditors), external service providers (such as mailing houses and information technology service providers) and regulatory bodies and government authorities as required or authorised by law.

#### Security of your personal information

We hold your personal information in both paper-based and electronic files. We seek to ensure that your personal information is protected from misuse, interference and loss, and unauthorised access, modification and disclosure.

The personal information that we hold about you is treated as confidential and only accessed when necessary. We seek to ensure that those that we disclose it to are bound by obligations of privacy and confidentiality. When we no longer require your personal information, including when we are no longer required by law to keep records relating to you, we destroy or de-identify it.

#### Accessing your personal information

You may request access to the personal information that we hold about you by contacting our Privacy Officer

on **admin@rollersmartshutters.com** On the rare occasions that we refuse access to your personal information, we will provide you with a written notice which sets out the reasons for the refusal. We may recover our reasonable costs (if any) in responding to a request for access to your personal information.

#### **Correcting your personal information**

We seek to ensure that the personal information that we collect is accurate, up-to-date and complete and, in the case of our use or disclosure of that information, relevant as well. To assist us with this, we encourage you to contact us if you believe that any information that we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, and make a request that we correct you personal information accordingly. You may make such a request by contacting our Privacy Officer on **admin@rollersmartshutters.com** If we refuse to correct any of your personal information following your request, we will give you a written notice which sets out the reasons for our refusal.

#### Marketing

We may use your personal information to provide you with information about product and services or investment opportunities, including those of third parties, which we think may be of interest to you. We may do this while we have a current business relationship with you, even if you are on the Do Not Call Register. We may also disclose your details to other organisations for specific marketing purposes. You may opt out of receiving marketing communications from us at any time if you no longer wish to receive this information. In order to do so, simply contact our Privacy Officer on admin@rollersmartshutters.com and request that we no longer send marketing communications to you or opt out in the way suggested in our communications.

#### **Questions and complaints**

If you have any questions, or if you believe that we have not complied with our obligations under the Privacy Act, or if you believe that the personal information that we hold about you has been compromised in any way, please contact our Privacy Officer on **admin@rollersmartshutters.com** We will respond to any question or complaint as soon as possible. If you are dissatisfied with our response, you may direct your complaint to the Office of the Australian Information Commissioner by email at **enquiries@oaic.gov.au** or by telephone on **1300 363 992**.

## **Changes to this Privacy Policy**

We may make change to this Privacy Policy from time to time without notice to you. Whether or not you are accessing our Privacy Policy on our website, the current version of our Privacy Policy is available on our website at https://rollersmart.com.au/privacy/ It was last updated on 11<sup>th</sup> February 2020.

## PERSONAL DATA COLLECTED FOR THE FOLLOWING PURPOSES AND USING THE FOLLOWING SERVICES:

#### **ANALYTICS**

# GOOGLE ANALYTICS, GOOGLE ANALYTICS WITH ANONYMIZED IP AND FACEBOOK ADS CONVERSION TRACKING (FACEBOOK PIXEL)

Personal Data: Cookies; Usage Data

## **CONTACTING THE USER**

#### **CONTACT FORM**

Personal Data: company name; email address; first name; last name; phone number; various types of Data; website

## HEAT MAPPING AND SESSION RECORDING

#### HOTJAR HEAT MAPS & RECORDINGS

Personal Data: Cookies; Usage Data; various types of Data as specified in the privacy policy of the service

## INTERACTION WITH EXTERNAL SOCIAL NETWORKS AND PLATFORMS

#### FACEBOOK LIKE BUTTON AND SOCIAL WIDGETS

Personal Data: Cookies; Usage Data

## REMARKETING AND BEHAVIOURAL TARGETING

#### ADROLL AND FACEBOOK REMARKETING

Personal Data: Cookies; Usage Data

#### FACEBOOK CUSTOM AUDIENCE

Personal Data: Cookies; email address

## SPAM PROTECTION

## **GOOGLE RECAPTCHA**

Personal Data: Cookies; Usage Data

#### **AKISMET**

Personal Data: various types of Data as specified in the privacy policy of the service

## **CONTACT INFORMATION**

#### OWNER AND DATA CONTROLLER

Owner contact email: admin@rollersmartshutters.com

## **FULL POLICY**

## OWNER AND DATA CONTROLLER

Owner contact email: admin@rollersmartshutters.com

## TYPES OF DATA COLLECTED

Among the types of Personal Data that rollersmart.com.au collects, by itself or through third parties, there are: Cookies; Usage Data; first name; last name; phone number; company name; email address; various types of Data; website.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using www.rollersmart.com.au

Unless specified otherwise, all Data requested by rollersmart.com.au is mandatory and failure to provide this Data may make it impossible for rollersmart.com.au to provide its services. In cases where rollersmart.com.au specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by rollersmart.com.au or by the owners of third-party services used by rollersmart.com.au serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through rollersmart.com.au and confirm that they have the third party's consent to provide the Data to the Owner.

## MODE AND PLACE OF PROCESSING THE DATA

#### METHODS OF PROCESSING

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of rollersmart.com.au (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

## LEGAL BASIS OF PROCESSING

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing ("optout"), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any precontractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;

• processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

#### **PLACE**

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

#### **RETENTION TIME**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

#### Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long
  as needed to fulfill such purposes. Users may find specific information regarding the legitimate
  interests pursued by the Owner within the relevant sections of this document or by contacting the
  Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## THE PURPOSES OF PROCESSING

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Analytics, Contacting the User, Remarketing and behavioural targeting, Interaction with external social networks and platforms, SPAM protection and Heat mapping and session recording.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

## DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA

Personal Data is collected for the following purposes and using the following services:

#### **ANALYTICS**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of rollersmart.com.au, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>. Privacy Shield participant.

#### GOOGLE ANALYTICS WITH ANONYMIZED IP

Google Analytics is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on the location rollersmart.com.au is accessed from ("Google"). Google utilizes the Data collected to track and examine the use of rollersmart.com.au, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>. Privacy Shield participant.

## FACEBOOK ADS CONVERSION TRACKING (FACEBOOK PIXEL) (FACEBOOK, INC.)

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on www.rollersmart.com.au The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>. Privacy Shield participant.

## **CONTACTING THE USER**

CONTACT FORM (rollersmart.com.au) By filling in the contact form with their Data, the User authorizes rollersmart.com.au to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data collected: company name; email address; first name; last name; phone number; various types of Data; website.

#### HEAT MAPPING AND SESSION RECORDING

Heat mapping services are used to display the areas of a page where Users most frequently move the mouse or click. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.

Some of these services may record sessions and make them available for later visual playback.

## HOTJAR HEAT MAPS & RECORDINGS (HOTJAR LTD.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd.

Hotjar honors generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's opt-out information here. Personal Data collected: Cookies; Usage Data; various types of Data as specified in the privacy policy of the service. Place of processing: Malta – Privacy Policy – Opt Out.

#### INTERACTION WITH EXTERNAL SOCIAL NETWORKS AND PLATFORMS

This type of service allows interaction with social networks or other external platforms directly from the pages of www.rollersmart.com.au

The interaction and information obtained through rollersmart.com.au are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

It is recommended to log out from the respective services in order to make sure that the processed data on rollersmart.com.au isn't being connected back to the User's profile.

## FACEBOOK LIKE BUTTON AND SOCIAL WIDGETS (FACEBOOK, INC.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data collected: Cookies; Usage Data. Place of processing: United States – Privacy Policy. Privacy Shield participant.

## REMARKETING AND BEHAVIOURAL TARGETING

This type of service allows rollersmart.com.au and its partners to inform, optimize and serve advertising based on past use of rollersmart.com.au by the User.

This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioural targeting activity.

Some services offer a remarketing option based on email address lists.

In addition to any opt-out offered by any of the services below, the User may opt out of a third-party service's use of cookies for certain remarketing features by visiting the Network Advertising Initiative opt-out page.

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

## ADROLL (ADROLL, INC.)

AdRoll is an advertising service provided by AdRoll, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

## FACEBOOK REMARKETING (FACEBOOK, INC.)

Facebook Remarketing is a remarketing and behavioural targeting service provided by Facebook, Inc. that connects the activity of rollersmart.com.au with the Facebook advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>. Privacy Shield participant.

## FACEBOOK CUSTOM AUDIENCE (FACEBOOK, INC.)

Facebook Custom Audience is a remarketing and behavioural targeting service provided by Facebook, Inc. that connects the activity of rollersmart.com.au with the Facebook advertising network.

Personal Data collected: Cookies and email address.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>. Privacy Shield participant.

## **SPAM PROTECTION**

This type of service analyzes the traffic of rollersmart.com.au, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

#### **GOOGLE RECAPTCHA**

Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on the location rollersmart.com.au is accessed from.

The use of reCAPTCHA is subject to the Google privacy policy and terms of use.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>. Privacy Shield participant.

## **AKISMET (AUTOMATTIC INC.)**

Akismet is a SPAM protection service provided by Automattic Inc.

Personal Data collected: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

#### THE RIGHTS OF USERS

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.**Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.**Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.**Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.**Users have the right to bring a claim before their competent data protection authority.

#### DETAILS ABOUT THE RIGHT TO OBJECT TO PROCESSING

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

## HOW TO EXERCISE THESE RIGHTS

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

## **COOKIE POLICY**

rollersmart.com.au uses Cookies. To learn more and for a detailed cookie notice, the User may consult the Cookie Policy.

# ADDITIONAL INFORMATION ABOUT DATA COLLECTION AND PROCESSING LEGAL ACTION

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of rollersmart.com.au or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

#### ADDITIONAL INFORMATION ABOUT USER'S PERSONAL DATA

In addition to the information contained in this privacy policy, rollersmart.com.au may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

#### SYSTEM LOGS AND MAINTENANCE

For operation and maintenance purposes, rollersmart.com.au and any third-party services may collect files that record interaction with rollersmart.com.au (System logs) use other Personal Data (such as the IP Address) for this purpose.

#### INFORMATION NOT CONTAINED IN THIS POLICY

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## HOW "DO NOT TRACK" REQUESTS ARE HANDLED

rollersmart.com.au does not support "Do Not Track" requests.

To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

## CHANGES TO THIS PRIVACY POLICY

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within rollersmart.com.au and/or – as far as technically and legally feasible – sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## **DEFINITIONS AND LEGAL REFERENCES**

#### PERSONAL DATA (OR DATA)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### **USAGE DATA**

Information collected automatically through rollersmart.com.au (or third-party services employed in rollersmart.com.au), which can include: the IP addresses or domain names of the computers utilized by the Users who use rollersmart.com.au, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

## **USER**

The individual using rollersmart.com.au who, unless otherwise specified, coincides with the Data Subject.

#### **DATA SUBJECT**

The natural person to whom the Personal Data refers.

## DATA PROCESSOR (OR DATA SUPERVISOR)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

## **DATA CONTROLLER (OR OWNER)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of www.rollersmart.com.au The Data Controller, unless otherwise specified, is the Owner of www.rollersmart.com.au

#### rollersmart.com.au (OR THIS APPLICATION)

The means by which the Personal Data of the User is collected and processed.

## **SERVICE**

The service provided by rollersmart.com.au as described in the relative terms (if available) and on this site/application.

## **EUROPEAN UNION (OR EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

#### **COOKIES**

Small sets of data stored in the User's device.

#### **LEGAL INFORMATION**

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to rollersmart.com.au, if not stated otherwise within this document.

## **COOKIE POLICY OF rollersmart.com.au**

Cookies consist of portions of code installed in the browser that assist the Owner in providing the Service according to the purposes described. Some of the purposes for which Cookies are installed may also require the User's consent.

Where the installation of Cookies is based on consent, such consent can be freely withdrawn at any time following the instructions provided in this document.

# TECHNICAL COOKIES AND COOKIES SERVING AGGREGATED STATISTICAL PURPOSES

#### ACTIVITY STRICTLY NECESSARY FOR THE FUNCTIONING OF THE SERVICE

rollersmart.com.au uses Cookies to save the User's session and to carry out other activities that are strictly necessary for the operation of rollersmart.com.au, for example in relation to the distribution of traffic.

## ACTIVITY REGARDING THE SAVING OF PREFERENCES, OPTIMIZATION, AND STATISTICS

rollersmart.com.au uses Cookies to save browsing preferences and to optimize the User's browsing experience. Among these Cookies are, for example, those used for the setting of language and currency preferences or for the management of first party statistics employed directly by the Owner of the site.

## OTHER TYPES OF COOKIES OR THIRD PARTIES THAT INSTALL COOKIES

Some of the services listed below collect statistics in an anonymized and aggregated form and may not require the consent of the User or may be managed directly by the Owner – depending on how they are described – without the help of third parties.

If any third party operated services are listed among the tools below, these may be used to track Users' browsing habits – in addition to the information specified herein and without the Owner's knowledge. Please refer to the privacy policy of the listed services for detailed information.

## **ANALYTICS**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

## **GOOGLE ANALYTICS (GOOGLE LLC)**

Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of rollersmart.com.au, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network. Personal Data collected: Cookies and Usage Data. Place of processing: United States – Privacy Policy – Opt Out. Privacy Shield participant.

## GOOGLE ANALYTICS WITH ANONYMIZED IP

Google Analytics is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on the location rollersmart.com.au is accessed from ("Google"). Google utilizes the Data collected to track and examine the use of rollersmart.com.au, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US. Personal Data collected: Cookies and Usage Data. Place of processing: United States – Privacy Policy – Opt Out; Ireland – Privacy Policy – Opt Out. Privacy Shield participant.

## FACEBOOK ADS CONVERSION TRACKING (FACEBOOK PIXEL) (FACEBOOK, INC.)

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on www.rollersmart.com.au The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network. Personal Data collected: Cookies and Usage Data. Place of processing: United States – Privacy Policy. Privacy Shield participant.

## HEAT MAPPING AND SESSION RECORDING

Heat mapping services are used to display the areas of a page where Users most frequently move the mouse or click. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.

Some of these services may record sessions and make them available for later visual playback.

## HOTJAR HEAT MAPS & RECORDINGS (HOTJAR LTD.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd.

Hotjar honors generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's <u>opt-out information</u> here.

Personal Data collected: Cookies, Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: Malta – <u>Privacy Policy</u> – <u>Opt Out.</u>

#### INTERACTION WITH EXTERNAL SOCIAL NETWORKS AND PLATFORMS

This type of service allows interaction with social networks or other external platforms directly from the pages of www.rollersmart.com.au

The interaction and information obtained through rollersmart.com.au are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

It is recommended to log out from the respective services in order to make sure that the processed data on rollersmart.com.au isn't being connected back to the User's profile.

## FACEBOOK LIKE BUTTON AND SOCIAL WIDGETS (FACEBOOK, INC.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – <u>Privacy Policy</u>. Privacy Shield participant.

# HOW TO PROVIDE OR WITHDRAW CONSENT TO THE INSTALLATION OF COOKIES

In addition to what is specified in this document, the User can manage preferences for Cookies directly from within their own browser and prevent – for example – third parties from installing Cookies.

Through browser preferences, it is also possible to delete Cookies installed in the past, including the Cookies that may have saved the initial consent for the installation of Cookies by this website. Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses: Google Chrome, Mozilla Firefox, Apple Safari and Microsoft Internet Explorer.

With regard to Cookies installed by third parties, Users can manage their preferences and withdrawal of their consent by clicking the related opt-out link (if provided), by using the means provided in the third party's privacy policy, or by contacting the third party.

Notwithstanding the above, the Owner informs that Users may follow the instructions provided on the subsequently linked initiatives by the EDAA (EU), the Network Advertising Initiative (US) and the Digital Advertising Alliance (US), DAAC (Canada), DDAI (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

## OWNER AND DATA CONTROLLER

Owner contact email: admin@rollersmartshutters.com

Since the installation of third-party Cookies and other tracking systems through the services used within rollersmart.com.au cannot be technically controlled by the Owner, any specific references to Cookies and tracking systems installed by third parties are to be considered indicative. In order to obtain complete information, the User is kindly requested to consult the privacy policy for the respective third-party services listed in this document.

Given the objective complexity surrounding the identification of technologies based on Cookies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of Cookies by www.rollersmart.com.au

#### **DEFINITIONS AND LEGAL REFERENCES**

## PERSONAL DATA (OR DATA)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### **USAGE DATA**

Information collected automatically through rollersmart.com.au (or third-party services employed in **rollersmart.com.au**), which can include: the IP addresses or domain names of the computers utilized by the Users who use rollersmart.com.au, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### **USER**

The individual using rollersmart.com.au who, unless otherwise specified, coincides with the Data Subject.

#### **DATA SUBJECT**

The natural person to whom the Personal Data refers.

## DATA PROCESSOR (OR DATA SUPERVISOR)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

## **DATA CONTROLLER (OR OWNER)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of www.rollersmart.com.au The Data Controller, unless otherwise specified, is the Owner of www.rollersmart.com.au

## rollersmart.com.au/ (OR THIS APPLICATION)

The means by which the Personal Data of the User is collected and processed.

## **SERVICE**

The service provided by rollersmart.com.au as described in the relative terms (if available) and on this site/application.

## **EUROPEAN UNION (OR EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

## **COOKIES**

Small sets of data stored in the User's device.

#### **LEGAL INFORMATION**

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to rollersmart.com.au, if not stated otherwise within this document.