WEBSITE PRIVACY POLICY

Document Field	Controlled Value
Document Code	CGV-POL-003
Revision	1.0
Issue / Effective Date	25/08/2026
Next Review Date	25/08/2027
Document Owner	Keegan Marais
Quality Approver	Keegan Marais
SharePoint Section	06.00 Safety, Environment & Compliance (SEC)
Status	Current when approved and entered in the Document Control Register

BUSINESS DETAILS

Business Field	Details
Entity	Kathgar Trading Pty Ltd trading as Lubrisync
ABN	84 675 813 199
Website	www.lubrisync.com.au
Address	Unit 10, 22 Global Road, Neerabup WA 6031, Australia
Privacy Contact	info@lubrisync.com.au

PURPOSE OF THIS POLICY

This policy explains how Lubrisync handles personal information collected through our website and business activities. It is intended to align with good privacy practice and, where the Privacy Act 1988 (Cth) applies to Lubrisync, the Australian Privacy Principles (APPs).

1. SCOPE

This policy applies to personal information handled by Lubrisync in connection with our website, enquiries, marketing, customer and supplier relationships, sales administration, Bulk Dispensing Unit (BDU) services, Lubrisync IQ and related business activities. It does not apply to information that is not personal information under applicable law.

2. PERSONAL INFORMATION WE MAY COLLECT

The kinds of personal information we may collect depend on how you interact with us. They may include:

- Identity and contact details - name, business name, role, postal or site address, email address and telephone number.
- Business and transaction information - enquiry details, products or services requested, quotations, orders, delivery details, account correspondence, service history and records of customer interactions.
- Site and operational information - nominated contacts, workshop or customer-site details, BDU service information, refill records, equipment identifiers and information you provide for site assessments or support.
- Digital information - IP address, device and browser information, website usage information, referring pages and similar technical data generated when you use our website or digital services.
- Marketing preferences - whether you have subscribed, opted out or otherwise told us how you prefer to receive communications.
- Recruitment information - if you apply for work with us, information contained in your application, resume, references and related correspondence.

We do not seek to collect sensitive information through the general website unless it is reasonably necessary for a specific purpose and permitted by law.

3. HOW WE COLLECT INFORMATION

We generally collect personal information directly from you, including when you submit a website form, email or call us, request a quotation, place an order, book an assessment, meet with our team, use a Lubrisync service, or communicate with us in another way. We may also collect information from your employer or organisation, authorised representatives, publicly available business sources, referrals, service providers and digital platforms where permitted by law.

Where practicable, you may deal with us anonymously or by using a pseudonym. In many commercial situations this will not be practicable because we need accurate identity, contact, delivery, account or site information to respond to an enquiry or provide goods and services.

4. WHY WE COLLECT, USE AND DISCLOSE INFORMATION

We may collect, hold, use and disclose personal information for purposes including:

- responding to enquiries and providing product, technical, quotation and service information;
- processing orders, deliveries, invoices, account administration and customer service;
- assessing, installing, servicing and replenishing BDUs and providing related support;
- operating customer-facing digital tools such as Lubrisync IQ where those services are made available;
- managing supplier, contractor and business relationships;
- maintaining safety, compliance, stock, batch, service and business records;
- improving our website, products, services, systems and customer experience;
- sending marketing communications where permitted and managing opt-outs;
- preventing fraud, misuse, cyber incidents or other unlawful activity; and
- complying with legal, regulatory, insurance and dispute-resolution obligations.

5. WEBSITE DATA, COOKIES AND ANALYTICS

Our website may use cookies, server logs and similar technologies to make the site function, remember preferences, measure usage, understand traffic and improve performance. Some of these technologies may be provided by third-party hosting, analytics, security, customer relationship management or marketing providers.

You can usually control cookies through your browser settings. Blocking some cookies may affect website functionality. Where required, we will provide additional notices or consent choices for particular technologies.

6. DIRECT MARKETING

We may use contact information to send business updates, product information, offers or other marketing communications where permitted by law. You can opt out at any time by using an unsubscribe function (where provided) or contacting us. We will action valid opt-out requests within the period required by law.

7. WHO WE MAY DISCLOSE INFORMATION TO

Where reasonably necessary for the purposes described above, we may disclose personal information to:

- our employees, officers and authorised representatives;
- IT, website hosting, cloud storage, CRM, communications, analytics and cyber-security providers;
- freight, courier, warehousing, installation, service and other operational contractors;
- professional advisers, insurers, auditors, accountants and legal advisers;
- suppliers and technical partners where needed to answer a product or technical enquiry or provide a service; and
- government, regulators, courts, law enforcement or other parties where disclosure is authorised or required by law.

We do not sell personal information as a standalone commercial product.

8. OVERSEAS DISCLOSURE

Some service providers or technical/business partners we use may process or store personal information outside Australia. The countries involved depend on the provider and service in use at the relevant time. Lubrisync will take reasonable steps required by applicable privacy law when making cross-border disclosures. You may contact us for current information about likely overseas locations where it is practicable for us to identify them.

9. HOW WE HOLD AND PROTECT INFORMATION

Personal information may be held electronically and, where necessary, in physical business records. We use administrative, physical and technical safeguards that are reasonable for our size, systems and the nature of the information. These may include access controls, account security, system updates, secure service providers, backups and staff procedures.

No internet transmission or storage method is completely secure. If a data incident occurs, we will assess and respond to it in accordance with applicable law, including notification obligations where they apply.

10. RETENTION

We retain personal information only for as long as reasonably needed for the purpose for which it was collected, to maintain legitimate business and safety records, or to satisfy legal, tax, insurance, contractual or regulatory requirements. When information is no longer required, we take reasonable steps to destroy it or de-identify it where appropriate.

11. ACCESS AND CORRECTION

You may request access to personal information we hold about you or ask us to correct information that is inaccurate, out of date, incomplete, irrelevant or misleading. Contact us using the details below and provide enough information for us to identify the relevant record. We may need to verify your identity before acting on a request.

We will respond within a reasonable period and, where applicable, in accordance with the Privacy Act. If access or correction is refused, we will explain the basis for refusal where the law requires us to do so.

12. PRIVACY COMPLAINTS

If you have a privacy concern or complaint, please contact us first using the details below. Tell us what happened, the information involved and the outcome you are seeking. We will acknowledge and investigate the matter and aim to respond within a reasonable period.

If the Privacy Act applies to the matter and you are not satisfied with our response, you may be able to make a complaint to the Office of the Australian Information Commissioner (OAIC). Information about privacy complaints is available at www.oaic.gov.au.

13. THIRD-PARTY WEBSITES AND SERVICES

Our website may contain links to third-party websites or services. Their privacy practices are controlled by those third parties, not Lubrisync. Review the privacy information of a third party before providing personal information to it.

14. CHILDREN

Our website and services are directed principally to businesses and trade customers. We do not intentionally use the general website to collect personal information from children. If you believe a child has provided personal information to us inappropriately, contact us so we can assess the matter.

15. CHANGES TO THIS POLICY

We may update this policy when our information-handling practices, technology, services or legal obligations change. The current version will be published on our website and will show its effective date. We recommend reviewing it periodically.

16. CONTACT US

Contact Field	Details
Privacy Contact	Lubrisync - Privacy Enquiries
Email	info@lubrisync.com.au
Address	Unit 10, 22 Global Road, Neerabup WA 6031, Australia
Website	www.lubrisync.com.au

IMPORTANT

This document is a practical website policy based on Lubrisync's current project information. Actual website technologies, CRM/hosting providers, overseas data locations and business processes should be checked before publication and whenever they change.

REVISION HISTORY

Revision	Date	Description of Change	Approved By
1.0	25/08/2026	Initial controlled issue.	Keegan Marais