

NaviX Solutions - Privacy Policy

Our commitment to privacy

We respect each person's right to privacy and aim to manage any personal information in a transparent and open manner in accordance with applicable laws on data privacy protection and data security, in particular the Singapore Personal Data Protection Act and applicable international privacy laws. This Policy contains some important information about how we deal with personal information and will help you understand what data NaviX Solutions may collect, how NaviX Solutions uses and safeguards that data and with whom we may share it.

The personal information we collect

Personal information is any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity. We only collect the personal information that is necessary to lawfully and ethically carry on our business, to provide the information, products and services our customers and contacts request, to communicate efficiently with our customers and contacts, to keep our customers and contacts informed of products and services that are available from us, and to responsibly market our products and services. Our contacts include employees of our customers and people or employees of companies who may specify or recommend our products such as contractors, industrial contractors, project contractors, builders, consultants, distribution utility's, government, original equipment manufacturers, switchboard manufacturers, systems integrators, wholesalers and, engineers.

Unless we need particular information to supply the specific information, products or services you request, or to open a credit account for you, the personal information we might collect about you is limited to your name, gender, contact details, occupation, employer, company segment, company site type, relationship to or dealings with us or our customers, and details of your participation in our events and promotions and your purchases of our products and services.

If you apply to us to open a credit account, we may collect information about your financial position and credit history. We will collect your personal information only where it is reasonably necessary for one or more of our functions or activities. We will also ensure that collection of your personal information is relevant to and not excessive for the purposes for which it is collected and used. We may render information anonymous when feasible and appropriate, depending on the nature of the information and the risks associated with the intended uses.

We will generally collect your personal information directly from you. We may do this when you meet with one of our employees, communicate with us by telephone, mail, fax or email, subscribe to our publications, enter our competitions, participate in our promotions, join our alliance/partner programs, apply for access to our websites or our mobile device applications, or submit information via our websites or mobile device applications.

We might sometimes obtain information about you from third parties such as our customers and contacts (for example, a customer who sells you our products may provide us with information about you). If we receive personal information from such third parties or if it is not publicly available, and such information is not reasonably necessary for one or more of our functions or activities, then we will destroy or de-identify the information.

Where possible when dealing with us, you will be given the option of not identifying yourself or using a pseudonym. It is always up to you to decide whether to disclose personal information to us, although if you elect not to do so, we reserve the right not to register you as a user or provide you with information, products or services you request, or you may not be allowed to participate in our competitions and promotions. Failure to collect personal information may prevent us from achieving the purpose for which such information was given to us.



Use and disclosure

We may use personal information we hold about you to send you invitations to attend our events, information about our competitions and promotions and your participation in them, or communications about our products and services, but we will not send you communications if you have told us that you do not want to receive them.

Apart from that, we will only use your personal information to the extent necessary to provide you with a seamless experience and to improve the quality of our services to you, to assess and process any application you may make for credit, and to manage any account you may have with us.

Except with your consent, we will not disclose personal information we hold about you to any non-affiliated companies or any entities outside the NaviX Solutions group of companies to allow them to market their products and services.

Others who may have access to information

Sometimes we use external service providers who may have access to some personal information we collect. For example, we may use external contractors to manage our databases or websites or to attend to our marketing communications. We ensure that these contractors are bound by obligations of confidentiality and may only access information to the extent necessary to provide the services we require.

Direct marketing

NaviX Solutions will not use or disclose personal information about you that we hold for the purpose of direct marketing, except where:

- you have given consent to the use of your personal information;
- it is impracticable for us to obtain consent and we provide a simple method for you to opt out; or
- you would reasonably expect us to use or disclose the information for that purpose and we
 provide a simple method for you to opt out.

Collection of sensitive information

"Sensitive information" means a piece of information or an opinion about an individual's racial or ethnic origin, political opinion, religious beliefs, membership of a professional or trade association, membership of a trade union, criminal record, health information, genetic information, biometric information. We do not generally collect sensitive information about you unless you have given your consent and the information is reasonably necessary for one or more of our functions or activities. There may be other instances where sensitive information is collected, such as where it is required under local laws or a court/tribunal order, or where a permitted general or health situation exist in relation to the collection of the information by us.

Information Security

NaviX Solutions being part of a global group of companies, we also comply with GDPR specific requirements including those relating to legal grounds for processing, cross border data transfers, automated decision making and profiling, data retention, additional rights, claims and DPO contact details. We take reasonable steps to ensure that all personal information we hold is protected from misuse, interference and loss, and from unauthorised access, modification or disclosure.

We maintain security over our premises and access to our computer systems is limited by user identifiers and passwords.

We will keep your personal information only as long as is necessary for any purpose for which it may be used or disclosed by us. We keep relevant customers' data for three years after the end of the



contract or the last contact for marketing purposes, and contact data for three years after the last contact for the same purposes.

Cross-border disclosure of personal information

NaviX Solutions is part of a global group of companies with legal entities, business processes, management structures and technical systems that cross borders. As such, we may share information about you within the organisation and may need to disclose such information to other countries in which we do business for the purposes or uses outlined in this Policy and in accordance with applicable privacy laws.

Our Privacy Policy and practices are designed to provide a consistent level of protection to your personal information in all countries where we do business in. If your personal information is disclosed overseas and the laws in that particular country provide less protection for your information, your information will be handled by us in a manner described under this Policy.

In cases where NaviX Solutions employs the services of suppliers who are located overseas to collect, use, process or otherwise handle the personal information on its behalf, we will require such suppliers to handle the information in a manner consistent with our policies and where appropriate, we will put a contract in place with any external suppliers to ensure that your personal information is protected.

Some exceptions may apply, such as where you have given your consent to the disclosure of the information upon being informed by NaviX Solutions, or where the disclosure is required by local laws or a court/tribunal order.

Our Websites

You may use many sections of our websites anonymously, but any information you choose to submit to us via our sites (eg to book for an event, subscribe to a publication, enter a competition, participate in a promotion, or send us an email) will be treated in accordance with this Policy.

Our websites may use cookies to profile you and to tailor marketing material to your preferences. We may also record details of your visit to our sites such as your server address, domain name and browser type, the date and time of the visit, the information downloaded, customer identification code, and links from other sites followed to get to our sites - this information is anonymous and is only used for statistical and website development purposes.

You may require a username and password to access some sections of our sites. If you have a username and password, they will be used to identify you when you enter those sections.

We may store and process personal information collected from you in any country in which NaviX Solutions or our hosting providers maintain facilities. By using our services, you consent to the disclosure of your information among these facilities, including those located outside your country.

Links to other websites

NaviX Solutions' website may contain links to other websites. NaviX Solutions is not responsible for the privacy practices or the content of the other websites.

Correction of your personal information

If any personal data is inaccurate, out of date, irrelevant, misleading or incomplete, you may request that the data be amended, or we may determine that it should be removed. You may request that we notify any other entities of the correction, where we have previously disclosed such information to another entity. When data processing is based on your consent, you have the right to withdraw your consent at any time by sending a request to our Data Privacy Officer.

If we refuse to give you access to or correct the personal information as requested by you, we will provide the reasons for the refusal and the mechanisms available should you wish to lodge a complaint. We will always take reasonable steps to give access to you or make corrections in a way that meets your needs as well as the needs of NaviX Solutions.



Anti-spam obligations

NaviX Solutions is committed to complying with customary and/or legal anti-spam obligations. To this end, commercial electronic messages (in most cases, emails) sent to you which contain promotional material about services we provide will be sent either with your express or inferred consent. Such messages will always contain our contact information and a functional unsubscribe facility to allow you to opt-out of receiving messages of this nature from us in the future. We will honour any such unsubscribe requests within five working days.

Changes to this Policy

Please note this Policy will change from time to time. We will post changes to our Policy on this page. Please check this page regularly to keep up-to-date.

Contacting us about privacy

If you have any questions about our Privacy Policy, or if you wish to enquire about any privacy issue, make a request for access to information, or lodge a complaint in relation to the same, please contact our parent company at:

Privacy Officer (Legal Department) Schneider Electric - Pacific Zone 78 Waterloo Road Macquarie Park NSW 2113 privacy@au.schneider-electric.com

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