

AEI PRIVACY POLICY

Auto Electrical Imports Pty Ltd – ABN 45 010 753 063

Policy Owner	Auto Electrical Imports
Update Issued	May 2026
Next Review Date	June 2027 (or earlier if legislation changes)
Legislative Basis	Privacy Act 1988 (Cth); Privacy and Other Legislation Amendment Act 2024 (Cth)
Applies To	All persons whose personal information is held by AEI
Privacy Contact	admin@aeimports.com PO Box 1053 Archerfield QLD 4108

1. Purpose

Auto Electrical Imports Pty Ltd (ABN 45 010 753 063) and its brand IONNIC (“AEI”, “ionnic”, “we”, “us”, “our”) is committed to protecting the privacy of all individuals whose personal information it holds. This Policy explains how AEI collects, holds, uses, discloses and protects personal information in accordance with the Privacy Act 1988 (Cth) (the “Privacy Act”) and the Australian Privacy Principles (APPs) contained in Schedule 1 of the Privacy Act, as amended by the Privacy and Other Legislation Amendment Act 2024 (Cth).

AEI is an APP entity and is bound by all thirteen Australian Privacy Principles. This Policy sets out AEI’s practices and procedures for managing personal information in an open and transparent manner as required by APP 1.

IONNIC is a registered brand owned and operated by AEI. Any reference to “IONNIC” in this Policy, on the website IONNIC.com or in AEI’s commercial communications is a reference to Auto Electrical Imports Pty Ltd (ABN 45 010 753 063). The collection, use and disclosure of personal information carried out under the IONNIC brand is subject to the Policy in the same manner as personal information collected under the AEI name.

2. Scope

This Policy applies to all personal information held by AEI about:

- Trade customers and their employees, directors, officers and authorised contacts;
- Individuals who submit enquiries through AEI’s website (IONNIC.com) or by any other means;
- Suppliers, contractors and their individual representatives; and
- Prospective customers and business contacts.

3. Normative References

- Privacy Act 1988 (Cth) – Australian Privacy Principles (Schedule 1)
- Privacy and Other Legislation Amendment Act 2024 (Cth) – in force 11 December 2024 (most provisions); statutory tort of serious invasions of privacy in force 10 June 2025; automated decision-making disclosure obligations in force 10 December 2026
- Privacy (Notifiable Data Breaches) Amendment Act 2017 (Cth) – Notifiable Data Breaches scheme (Part IIIIC of the Privacy Act)
- Spam Act 2003 (Cth) – electronic marketing obligations
- Australian Consumer Law (Schedule 2 of the Competition and Consumer Act 2010 (Cth)) – prohibition on misleading representations
- Office of the Australian Information Commissioner (OAIC) – APP Guidelines (as updated)

4. What Personal Information AEI Collects

4.1 Trade Customers and Credit Applicants

When a business applies for a trade account with AEI, or places orders, AEI may collect the following personal information about the business's directors, officers, authorised contacts and guarantors:

- Full name, title and position;
- Business address, postal address and delivery address;
- Email address and telephone numbers;
- Date of birth and driver's licence number (where required for credit assessment);
- Credit history, financial position and payment conduct; and
- Information obtained from credit reporting bodies in the course of assessing a credit application.

AEI collects this information to assess creditworthiness, establish and administer trade accounts, process orders, manage payment and debt collection, and comply with its legal obligations. This is consistent with the authorisation given in AEI's Trading Terms (Clause 4.14).

4.2 Website Enquirers

When an individual submits an enquiry through the IONNIC website, AEI collects the information provided in the enquiry form, which may include name, email address, location, industry and the content of the enquiry. AEI also automatically collects technical data including IP address, browser type and access times through server log files for the purpose of site performance evaluation and security monitoring. This technical data is not linked to any personally identifiable information.

4.3 Suppliers and Contractors

AEI collects the names, position titles, contact details, bank details for payment purposes, and relevant business information of individuals who are representatives of AEI's suppliers and contractors, to the extent necessary to manage those business relationships, place purchase orders, administer accounts payable and comply with legal obligations.

4.4 Sensitive Information

AEI does not intentionally collect sensitive information (as defined in s.6 of the Privacy Act, including health information, racial or ethnic origin, criminal record, or biometric information) about any individual. If AEI inadvertently receives sensitive information, it will either seek the individual's consent to hold it for a specified purpose or destroy or de-identify it as soon as practicable.

5. How AEI Collects Personal Information

AEI collects personal information only by lawful and fair means and only where reasonably necessary for one or more of its functions or activities.

AEI collects personal information through the following channels:

- Credit and trading account application forms completed by customers or their representatives;
- Purchase orders, email communications and sales correspondence;
- Enquiry and contact forms submitted through the AEI and IONNIC websites;
- Telephone and in-person communications;
- Credit reporting bodies, trade references and public registers (e.g. ASIC, PPSR) in connection with credit assessment; and
- Business cards, LinkedIn and other professional networking contexts.

Where it is reasonably practicable to do so, AEI will collect personal information directly from the individual concerned. Where personal information is collected from a third party (such as a credit reporting body or trade referee), AEI will take reasonable steps to notify the individual of that collection as soon as practicable, unless an exception under the Privacy Act applies.

6. Notification at the Point of Collection

At or before the time AEI collects personal information from an individual, AEI will take reasonable steps to ensure the individual is aware of:

- AEI's identity and contact details (set out in Section 13 of this Policy);
- The fact that AEI is collecting the information and the circumstances of that collection;
- The purposes for which the information is collected;
- The main consequences if the information is not provided;
- Any other APP entities, bodies or persons to whom AEI usually discloses information of that kind;
- Whether AEI is likely to disclose the information to overseas recipients (see Section 10 of this Policy); and
- That this Privacy Policy is available on request and on AEI's website.

7. How AEI Uses and Discloses Personal Information

7.1 Primary Purposes

AEI uses personal information for the primary purpose for which it was collected, which includes:

- Assessing applications for trade credit and establishing customer accounts;
- Processing and fulfilling product orders and managing customer relationships;
- Issuing invoices, managing accounts receivable and pursuing payment of outstanding amounts;
- Managing supplier and contractor relationships and accounts payable;
- Responding to enquiries made through the IONNIC website; and
- Complying with AEI's legal and regulatory obligations.

7.2 Secondary Purposes

AEI may also use or disclose personal information for a secondary purpose that is directly related to the primary purpose of collection, where an individual would reasonably expect AEI to do so, or where the individual has consented. Such secondary purposes include:

- Disclosing personal information to credit reporting bodies for credit assessment and, in the event of default, for credit reporting purposes;
- Disclosing personal information to AEI's professional advisers (including solicitors, accountants and auditors) where necessary for those advisers to provide services to AEI;
- Disclosing personal information to mercantile agencies or debt collection services where an overdue account has been referred for collection;
- Disclosing personal information to ASIC, the ATO, courts or regulatory bodies where required or authorised by law; and
- Using contact details to send direct marketing communications where permitted under APP 7 and the Spam Act 2003 (see Section 8 of this Policy).

7.3 No Sale of Personal Information

AEI will not sell, rent, trade or give personal information to any third party for that third party's own commercial purposes. Disclosure to third parties is limited to the circumstances described in this Policy.

8. Direct Marketing

AEI may use personal information to send individuals promotional emails, product updates and newsletters about AEI's and IONNIC's products and services. AEI will only send direct marketing communications to individuals who have consented to receive them, or where AEI reasonably believes the individual would expect to receive them based on their existing business relationship with AEI.

Every direct marketing communication sent by AEI will contain a clear and functional unsubscribe mechanism. Individuals may opt out of receiving direct marketing communications at any time by:

- Clicking the "Unsubscribe" link in any marketing email; or
- Contacting AEI directly at admin@aeimports.com with the subject line "Unsubscribe".

AEI will action all opt-out requests within five business days. AEI does not use sensitive information for direct marketing purposes. Transactional and administrative communications (such as order confirmations, invoices and account notices) are not direct marketing communications and will continue to be sent regardless of marketing preferences.

9. Anonymity and Pseudonymity

Where it is lawful and practicable to do so, individuals may interact with AEI anonymously or using a pseudonym. In particular, individuals may browse the IONNIC websites and read publicly available product information without identifying themselves.

However, for certain interactions – including submitting a trade credit application, placing an order, submitting a website enquiry, or entering into a contract with AEI – it is not practicable for individuals to remain anonymous, as AEI requires personal information to fulfil those functions.

10. Cross-Border Disclosure of Personal Information

AEI does not disclose personal information to overseas recipients. All of AEI's systems, software platforms and data storage infrastructure are hosted within Australia. AEI's professional advisers, credit reporting bodies and service providers engaged to assist with debt collection are all based in Australia.

If AEI's practices change in the future such that personal information may be disclosed to an overseas recipient, this Policy will be updated prior to any such disclosure, and AEI will comply with APP 8 by taking reasonable steps to ensure the overseas recipient does not breach the APPs in relation to that information.

11. Security of Personal Information

11.1 Security Measures

AEI takes reasonable steps to protect personal information it holds from misuse, interference, loss, and from unauthorised access, modification and disclosure. AEI's security measures include:

- Physical security measures including restricted access to AEI's premises and server infrastructure;
- Electronic security measures including password protection, access controls, and role-based user permissions on all information systems;
- Limiting access to personal information to employees and contractors who need it to perform their functions;
- Requiring employees to comply with AEI's IT and Social Media Policy and Code of Conduct in relation to the handling of personal and confidential information; and
- Securely destroying or de-identifying personal information when it is no longer required for any purpose for which it may be used or disclosed, and when retention is no longer required by law.

11.2 Notifiable Data Breaches

AEI is subject to the Notifiable Data Breaches (NDB) scheme under Part IIIIC of the Privacy Act. Where AEI has reasonable grounds to believe that an eligible data breach has occurred – that is, where personal information has been accessed, disclosed or lost in circumstances likely to result in serious harm to one or more individuals – AEI will:

- Conduct a prompt assessment of whether the incident constitutes an eligible data breach;
- Notify the Office of the Australian Information Commissioner (OAIC) as soon as practicable, and no later than 30 days after AEI becomes aware of grounds to believe a breach has occurred;
- Notify the affected individuals as soon as practicable; and
- Take all reasonable steps to contain the breach and prevent further harm.

12. Quality of Personal Information

AEI takes reasonable steps to ensure that the personal information it collects, uses and discloses is accurate, up-to-date, complete and relevant. AEI encourages individuals to notify AEI if their personal information changes, and to assist AEI in keeping records current by contacting AEI at admin@aeimports.com.

13. Access to Personal Information

13.1 Right of Access

Under APP 12, individuals have the right to request access to personal information that AEI holds about them. AEI will respond to all access requests within 30 days of receipt.

To make an access request, an individual should contact AEI in writing at:

Privacy Officer, Phil Eadie – Auto Electrical Imports Pty Ltd
Email: admin@aeimports.com
Subject line: "Privacy Access Request"

AEI may ask the individual to verify their identity before processing an access request. AEI will not charge a fee for making an access request. AEI may charge a reasonable fee to cover the cost of providing access where that cost is substantial.

13.2 Grounds for Refusing Access

AEI may refuse to provide access to personal information in the circumstances permitted under APP 12.3, including where giving access would:

- Have an unreasonable impact on the privacy of other individuals;
- Reveal evaluative information generated by AEI in connection with a commercially sensitive decision-making process;
- Prejudice legal proceedings or an investigation; or
- Be required or authorised to be refused under an Australian law.

Where AEI refuses access, AEI will provide the individual with a written notice setting out the reasons for the refusal (to the extent it is reasonable to do so) and the mechanisms available to the individual to complain about the refusal, including the individual's right to complain to the OAIC (see Section 15 of this Policy).

14. Correction of Personal Information

14.1 Right to Request Correction

Under APP 13, individuals may request that AEI correct personal information AEI holds about them if the individual believes the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. AEI will also correct personal information on its own initiative if it becomes satisfied that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

Correction requests are free of charge. To request a correction, an individual should contact AEI in writing at admin@aeimports.com with the subject line "Privacy Correction Request", specifying the information to be corrected and the reason for the correction. AEI will respond to all correction requests within 30 days of receipt.

14.2 Steps Taken on Correction

When AEI corrects personal information that it has previously disclosed to another organisation, and where the individual requests AEI to notify that organisation of the correction, AEI will take reasonable steps to do so unless it is impracticable or unlawful.

14.3 Refusal to Correct

If AEI refuses to correct personal information as requested, AEI will provide the individual with a written notice setting out:

- The reasons for the refusal, except to the extent it would be unreasonable to do so;
- The mechanisms available to complain about the refusal; and
- The individual's right to request that AEI associate a statement with the information indicating that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading.

15. Privacy Complaints and How to Make Them

15.1 Complaints to AEI

If an individual believes AEI has breached the Privacy Act or the APPs in relation to their personal information, they are encouraged to contact AEI in the first instance so that AEI can attempt to resolve the matter. Complaints should be submitted in writing to:

Privacy Officer, Phil Eadie - Auto Electrical Imports Pty Ltd
Email: admin@aeimports.com
Subject line: "Privacy Complaint"

AEI will acknowledge receipt of a complaint within five business days and will use reasonable endeavours to investigate and respond to the complaint within 30 days. Where a complaint is complex or requires investigation, AEI will notify the individual of the expected timeframe for resolution.

15.2 Complaints to the OAIC

If an individual is not satisfied with AEI's response to a privacy complaint, or if AEI fails to respond within a reasonable time, the individual may make a complaint to the Office of the Australian Information Commissioner (OAIC):

- Online: www.oaic.gov.au/privacy/privacy-complaints
- Phone: 1300 363 992
- Post: GPO Box 5218, Sydney NSW 2001

Under the Privacy and Other Legislation Amendment Act 2024, individuals who suffer serious invasions of privacy may also have a right to bring proceedings in court under the statutory tort of serious invasions of privacy (in force from 10 June 2025). Nothing in this Policy limits an individual's right to pursue any remedy available to them under Australian law.

16. Website, Cookies and Log Files

When individuals visit the AEI or IONNIC website, AEI automatically collects server log file data including IP addresses, browser types and access times. This data is used for site performance evaluation, security monitoring and analytics, and is not linked to any personally identifiable information.

AEI's website may use cookies – small data files stored on a visitor's device – to improve the browsing experience and track site usage. Individuals may configure their browser to refuse cookies; however, this may affect the functionality of certain website features.

AEI's website may contain links to third-party websites. AEI is not responsible for the privacy practices of those websites and encourages individuals to read the privacy policies of any linked site they visit.

17. Automated Decision-Making

AEI does not currently use any automated or algorithmic computer programs to make, or to substantially and directly assist in making, decisions that could reasonably be expected to significantly affect the rights or interests of individuals. All decisions made by AEI in relation to credit assessment, account management, pricing and other matters affecting individuals are made by AEI’s staff.

From 10 December 2026, the Privacy and Other Legislation Amendment Act 2024 will require APP entities to disclose in their privacy policies any use of computer programs to make or substantially assist in significant decisions affecting individuals. AEI will review and update this Policy prior to that date if its practices change.

18. Policy Review

This Policy will be reviewed at a minimum every two years, with the next scheduled review in June 2027. An earlier review is required if any of the following occur:

- A change to the Privacy Act 1988, the APPs, or any instrument made under the Privacy Act;
- A new or updated OAIC APP Guideline that affects AEI’s obligations;
- The commencement of the automated decision-making disclosure obligations (10 December 2026), if AEI’s practices are affected;
- A material change in the way AEI collects, holds, uses or discloses personal information;
- An eligible data breach that reveals a gap in AEI’s privacy framework; or
- A finding or recommendation arising from an OAIC investigation or complaint.

The current version of this Policy will be made available on AEI’s website (IONNIC.com) and any individual may request a copy of this Policy by contacting AEI at admin@aeimports.com.

19. Summary of AEI’s Compliance with the Australian Privacy Principles

APP	Principle	AEI’s Approach
APP 1	Open & transparent management	Privacy policy publicly available; internal handling practices documented
APP 2	Anonymity & pseudonymity	Website browsing and general enquiries may be made anonymously where practicable
APP 3	Collection of solicited information	Collected only where reasonably necessary; by lawful and fair means
APP 4	Unsolicited information	Destroyed or de-identified if not reasonably necessary to hold
APP 5	Notification of collection	Individuals notified at or before the point of collection
APP 6	Use or disclosure	Used only for the primary purpose of collection or a directly related secondary purpose
APP 7	Direct marketing	Opt-out available in every marketing communication; no sensitive information used
APP 8	Cross-border disclosure	AEI does not disclose personal information to overseas recipients
APP 9	Government related identifiers	AEI does not adopt, use or disclose government identifiers as its own

APP	Principle	AEI's Approach
APP 10	Quality	Reasonable steps taken to ensure information is accurate, complete and up-to-date
APP 11	Security	Protected against misuse, interference, loss and unauthorised access
APP 12	Access	Individuals may request access; response within 30 days; written refusal notice if declined
APP 13	Correction	Individuals may request correction; free of charge; response within 30 days