

ZENEOS PRIVACY POLICY

This policy is intended to set out ZENEOSs, its related companies and trusts (the "Group") approach to complying with the Privacy Act.

Collection of Information

The Company operates the following businesses:

1. Tires manufacturer;
2. Tires distribution networks;

ZENEOS collects industry and personal information in order to carry on its business in tires manufacturer and distributor. The primary purpose of collection of personal information is for entry into a tires transaction and communication with our customers and investors.

From time to time, members of ZENEOS conduct surveys as to customers and investors personal preferences, which may collect personal information to improve our customer or investor services.

The collection, maintenance and disclosure of certain personal information is governed by the Privacy Act and other legislation. Personal Information may also be disclosed to other members of ZENEOS.

Guidelines for Collection of Personal Information

Information to be collected from customers and investors is to be relevant and appropriate for operating the relevant business in ZENEOS.

Where practical it is ZENEOS's policy to collect the information from the individual concerned. ZENEOS may collect information in particular circumstances about personal preferences to assist ZENEOS in its marketing initiatives.

From time to time ZENEOS may employ third party advertising companies who are used to measure the effectiveness of any advertising by monitoring traffic on the website. Any information collected is anonymous and does not identify people.

To Whom is Personal Information Disclosed

This information is not provided to third parties unless such disclosure is required by law.

From time to time ZENEOS may undertake a marketing campaign with an affiliate retailer in the tire industry where the customer has stayed. Our retailer may also undertake marketing campaigns in conjunction with corporate affiliates. No personal information is provided to these affiliates as ZENEOS undertakes the direct marketing on behalf of the companies.

Parties to whom ZENEOS may disclose relevant personal information include: (a) Consultants (including solicitors) and agents (including retailer) acting on our behalf; (b) Corporate affiliates; (c) regulatory authorities where required by law; (d) related parties and entities of the ZENEOS for marketing purposes; and (e) parties to whom ZENEOS has outsourced various functions e.g. share registry services, tire retailer, etc.

How Information is collected?

Personal information is generally collected through an application or tire registration form, the internet, applying to become a member of various customer loyalty programs run by ZENEOS or through a competition. Occasionally personal information is collected through a questionnaire or survey.

The information used and collected is only for the purposes of the particular transaction and for use within ZENEOS e.g. for marketing initiatives or to communicate with you.

Maintenance of the Quality of Information

ZENEOS will take reasonable steps to ensure that the personal information it collects and uses is accurate, complete and up to date.

ZENEOS will let individuals see information held about them and correct the errors or omissions. Where a customer or investor wishes to review information held about them, they should contact or be referred to the Privacy Officer.

It is ZENEOS's policy from time to time to delete or de-identify information about you when it is no longer needed or no longer a legal requirement for the information to be kept.

Security of Information

No employee is able to access information they do not require for the proper carrying on of their job. There are passwords and security access IDs in place to restrict access of confidential and personal information about individuals to those that need it in the carrying on of their positions.

Changes to ZENEOS's Privacy Statement

This policy is dated 26 February 2010. ZENEOS reserves the right to modify or amend this statement at any time and will provide an update of the policy on our Web Site if it has been changed. If you have any further questions about our Privacy Statement please contact our Privacy Officer.

Your access and use of the Site is governed by the ZENEOS's Terms of Use.

On-line Privacy Policy

Our Privacy Policy outlines how ZENEOS collects information when you visit the Site and what in turn is done with this information.

ZENEOS uses non-personalised statistics about the use of the Site. This information is used to continually assess and improve the ZENEOS Site and ZENEOS's service to you.

If and when you submit information to ZENEOS either by electronic e-mail or electronic or written form - ZENEOS collects the relevant information and uses it only for the purpose that you provided it.

ZENEOS does not sell or provide its customer lists to third parties.

ZENEOSs Site may contain links to other web sites and those third party web sites may collect personal information about you. We are not responsible for the privacy practices of other businesses or the content of web sites that are linked to our web site. ZENEOS encourages users to be aware when they leave the site and to read the privacy statements of each and every web site that collects personally identifiable information.

ZENEOS collects information from the Site using cookies and IP files. A cookie is a message given by a web browser to a web server. The main objective of a cookie is to identify users, track preferences and to improve and update the Site and to ensure that the correct data is being sent to your computer.

Cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track your movements around the web. No personal details are contained in the cookie and they are not used to retrieve any personal information.

When you visit ZENEOSs Site to read, browse or download information, our system will record/log your IP address (the address which identifies your computer on the internet and which is automatically recognised by our web server), date and time of your visit to our site, the pages viewed and any information downloaded. This information will only be used for the purpose of site analysis and to help us offer you improved online service. We may automatically collect non-personal information about you such as the type of Internet browsers you use or the site from which you linked to our Site. You cannot be identified from this information and it is only used to assist us in providing an effective service on our site.

ZENEOS may vary its privacy policy and any change or variation will be published on the Site - you will not be notified directly of these changes.

You accept that your use of this site includes your acceptance of the Privacy Policy and Terms of Use.

