

Polyflor Australia Pty Ltd Privacy Policy

This is the privacy policy of Polyflor Australia Pty Ltd (ABN 68 007 134 518) referred to in this policy as 'Polyflor Australia', 'we', 'us' or 'our'.

The purpose of this privacy policy is to provide information about how we deal with and manage personal information in accordance with the privacy laws which apply to you.

Polyflor Australia's business operates in Australia and New Zealand. Therefore, this Privacy Policy relates to the privacy laws of those countries. For Australia, this is the *Privacy Act 1988* (Cth), including the Australian Privacy Principles (**APPs**) and for New Zealand, the Privacy Act 2020 and the Privacy Principles (**NZPPs**). Information about the APPs is accessible at this link <https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference>. Information about the NZPPs is accessible at this link <https://www.privacy.org.nz/privacy-act-2020/privacy-principles/>. In this policy "Privacy Principles" means the APPs or the NZPPs as the context requires.

You consent to us collecting, holding, using and disclosing your personal information in accordance with this policy.

What is personal information?

'Personal information' is information or an opinion about an identified or reasonably identifiable individual, regardless of whether or not it is true.

Why do we collect personal information?

We collect, hold and use personal information so that we can:

- provide our users with products and services, and manage our relationship with them;
- contact our customers, for example, to respond to queries or complaints, or if we need to tell them something important;
- comply with our legal obligations and assist government and law enforcement agencies or regulators; and
- identify and tell customers about other products or services that we think may be of interest.

If you do not provide us with your personal information, we may not be able to provide you with our services, communicate with you or respond to your enquiries.

We collect personal information where it is reasonably necessary for our functions or activities. In addition to our core business activity of designing, manufacturing, installing and maintaining beautiful and functional flooring solutions, our other functions and activities include:

- marketing our products and other material, our services and our business generally;
- undertaking research to improve our products and other materials, our services and our business;
- obtaining goods and services (for example flooring products) from other businesses;

- supplying goods and services to our customers;
- employing staff and engaging with contractors for some purposes; and
- complying with legal and regulatory obligations.

Some common examples of personal information that we may collect include an individual's name, contact details, employer details and details of products and services that they obtain from us. We may also collect details such as date of birth if provided to us by the individual.

The credit card information and direct debit bank details of individuals who purchase Polyflor Australia's products online are provided directly to the credit card provider or bank by the individual via a secure payment gateway. Polyflor Australia does not obtain access to details submitted via the gateway. However, we may collect and retain credit card information if it is supplied to us over the phone or via fax, email or in other hard copy.

Some personal information may be more sensitive in nature (**sensitive information**).

Examples of sensitive information may include information about an individual's:

- health;
- racial or ethnic origin;
- political opinions;
- membership of a political association, professional or trade association or trade union;
- religious beliefs or affiliations;
- philosophical beliefs;
- sexual orientation or practices; and
- criminal record.

In general, we don't collect sensitive information, but any which we do collect will either be collected with the individual's consent or as permitted by law.

How do we collect personal information?

We collect personal information about individuals and their interactions with us, for example, when they purchase or use any of our products or services, call us, or otherwise visit our websites at www.polyflor.com.au and www.polyflor.co.nz (**our websites**).

When you purchase products from us we will collect your address and phone number to enable us to create a tax invoice for your records and, where you have ordered product/s for delivery, so we can provide delivery details to our distribution service provider/s.

We may collect information about how you access, use and interact with our websites. This information may include the location from which you have come to the website and the pages you have visited, together with technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system.

We may use cookies on our websites. A cookie is a small text file that the website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your

use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website. You may refuse to use cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of the website.

We receive personal information in different ways and through a number of different media including:

- via online sources (including email);
- by telephone and fax;
- through face to face communications; and
- by hard copy correspondence and documentation.

How do we store personal information?

We keep different types of records that include personal information. These include records stored electronically on data bases and in hard copy files.

We store most personal information in computer systems and databases operated by either us or our external service providers. Some personal information about is recorded in paper files that we store securely.

We implement and maintain processes and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

We will also take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any other purpose permitted under the applicable Privacy Principles.

We may store personal information outside of the country where you live. If we do, the IT service provider who stores the personal information will not have direct access to it and we will have arrangements in place with the provider to ensure that the personal information is held in accordance with the requirements of the applicable privacy laws.

We may also share personal information with parties based outside of the country where you live, as detailed elsewhere in this Privacy Policy. The privacy policies of those third parties will apply in connection with their processing of such personal information.

When do we use or disclose personal information?

We may transfer or disclose personal information to our related companies. We may also disclose personal information to external service providers so that they may perform services for us or on our behalf, including our logistics providers, technology service providers (including our accounting software provider), our distributors, our mailing houses and our subcontractors.

Key third parties which we routinely share personal information with are:

- Our mailing houses, primarily Constant Contact and Mailchimp. These entities have their own privacy policies which will apply, in addition to this Privacy Policy, to personal information of our customers that we provide to them.
 - Constant Contact Privacy Notice is accessible at <https://www.endurance.com/privacy/privacy>
 - Mailchimp Privacy Notice is accessible at <https://mailchimp.com/legal/privacy/>.
- Our service providers include [insert details of key third party service providers that [insert company name abbreviation] needs to share personal information with].

We may share relevant customers' personal information with these parties. Where we share personal information with them, their privacy policies will apply in addition to this Privacy Policy.

Please refer to their websites for copies of their applicable Privacy Policies.

If we collect personal information for a particular purpose, we may use or disclose that personal information for that purpose. For example, if a customer obtains a product or service from us, we may use and/or disclose their personal information for the purpose of providing the product or service to them.

We may also use or disclose personal information for other purposes including the following:

- the individual has consented to the use or disclosure for the other purpose;
- the secondary purpose is related to (or in the case of sensitive information directly related to) the purpose for which the personal information was collected and the individual concerned would reasonably expect us to use or disclose the information – for example providing marketing information to existing customers (unless the customer has requested not to receive marketing information from us);
- the use or disclosure is required or authorised under an applicable law or a court or tribunal order;
- if the use or disclosure of the information is authorised by the Privacy regulator; or
- we reasonably believe that the use or disclosure of the personal information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

If the ownership or control of all or part of our business changes, we may transfer personal information to the new owner.

Do we use personal information for marketing?

By providing us with personal information, the individual is consenting to us using their personal information for the purpose of writing to the individual, directly or via a third party, to inform them about ourselves, and about our products and services (including by electronic means). The individual can opt out of receiving commercial electronic messages from us by

using the unsubscribe function in the electronic message, or by contacting us at any time via the email address below.

How can you access your personal information that we hold?

You may request access or correction to your personal information held by us by emailing us at *[insert company name]*,*[insert company email address for privacy enquiries]*.

There are some circumstances in which we are not required to give you access to your personal information.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

What should you do if you believe we hold personal information about you that is wrong or you wish to complain about how we have handled your personal information?

If you believe that we hold personal information about you that is wrong (which includes inaccurate, out of date, incomplete, irrelevant or misleading), or you wish to complain about how we have handled your personal information, you should contact us at *[insert company name]*,*[insert company email address for privacy enquiries]*. Also, you may use that email address to notify us that you do not wish to receive emails from us.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

If you have complained to us about how we have handled your personal information, and you believe that we have not satisfactorily resolved your complaint, you may wish to contact:

- Australian users: the Office of the Australian Information Commissioner (<https://www.oaic.gov.au/>).
- New Zealand users: the Office of the Privacy Commissioner (<https://www.privacy.org.nz/>).

Changes to this policy

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy from our website or by contacting us at the contact details above.