#### **PRIVACY**

This Privacy Policy explains in general terms how Hunter Douglas Limited (ABN: 98 009 675 709) and its related companies (together we, us, our and other similar expressions) protects the privacy of your personal information under the principles set out in the Privacy Act. It also sets out the matters which we are required to disclose to individuals under the principles set out in the Privacy Act. We encourage you to read this policy carefully so that you understand our information handling practices.

## **COLLECTING PERSONAL INFORMATION ABOUT YOU**

In order to provide our customers with our products and services, we may collect and use personal information about you and others. If we are not provided with all the personal information we request, we may not be able to supply our products and services.

We generally collect your personal information directly from you. For example, we collect personal information about you when you deal with us over the telephone, send us correspondence (whether by letter, facsimile or email) subscribe electronically to our publications or when you have contact with us in person.

Generally, the type of personal information we collect about you includes your name, mailing address, telephone number and email address. We may also collect sensitive information about you such as information about membership of a professional or trade association. We only collect sensitive information in limited circumstances including where:

- You have consented to it; or
- The collection is required by law; or
- The collection is necessary for the establishment, exercise or defence of a legal or equitable claim.

There may be occasions where we need to source personal information about you from a third party. For example, we may collect personal information from a company with whom you work, other organization with whom you have any dealings, a credit reporting body, an information service provider or from a publicly maintained record.

We generally collect personal information by way of forms filled out by people, face-to-face meetings, business cards, telephone conversation and from third parties.

We collect personal information from our websites or through receiving customer enquiries and emails. We also use third parties to analyse traffic on our websites. Information collected through such analysis is anonymous.

PURPOSE FOR COLLECTION, USE, AND DISCLOSURE OF YOUR PERSONAL INFORMATION

We may use and disclose your personal information for the primary purpose for which it is collected, for reasonably expected secondary purposes which are related to the primary purpose and in any other circumstances authorised by the Privacy Act.

In general, we use and disclose your personal information for the following purposes:

- To conduct our business;
- To market our services;
- To communicate with you;
- To comply with our legal obligations; and
- To help us manage and enhance our services.

We usually disclose the personal information we collect to our related entities, service providers and contractors, who help us supply our products and services. For example, to industry credit bureaux, like Trade Bureaux Australia or to credit reporting bodies, such as:

- Veda contact details available at www.veda.com.au
- Dun & Bradstreet contact details available at www.dnb.com.au

Except where indicated above, we will not use or disclose personal information unless:

- The individual concerned has consented to the use and disclosure to conduct our business;
- The third party is our service provider or contractor, in which case we will require them to
  use and disclose the personal information only for the purpose for which it was provided to
  them;
- The third party is a person involved in a dealing or proposed dealing (including a sale) of all or part of our assets and business;
- The third party is a credit reporting agency, your creditor, banker, financier, credit provider, mortgage insurer or trade insurer;
- The disclosure is to a related body corporate; or
- The disclosure is permitted, required or authorised by or under law.

If we act as a credit provider to you, we may report to a credit reporting body an overdue payment from you, providing we have first advised you of the overdue payment, have requested payment from you and you have failed to make payment to us.

### **CREDIT INFORMATION**

If you are a customer and we give you credit or if you give a personal guarantee in respect of a customer, we may collect credit information or credit eligibility information about you. Credit information and credit eligibility information are particular types of personal information.

The credit information and credit eligibility information we may collect about you includes: identification information; credit liability information; repayment history information; details of any request for your information that we receive from a credit provider, mortgage insurer or trade insurer; the type and the amount of credit sought; default information; payment information; court proceedings information; personal insolvency information; information about any serious credit infringement by you; information disclosed in reports obtained from credit reporting bodies; information property searches; information provided by trade references;

We generally collect your credit information or credit eligibility information directly from you. For example, if you complete an Application for Commercial Credit or if you give a personal guarantee in respect of a customer.

We may also collect credit information or credit eligibility information about you from third parties. For example, from your employer, any other organization with whom you have any dealings, credit reporting bodies, like Veda and Dun & Bradstreet, industry credit bureaux, like Trade Bureaux Australia or from publicly maintained records.

The purpose for which we may collect, hold, use and disclose credit information or credit eligibility information about you, is so we can assess whether to extend credit to you or to a customer (if you have given a personal guarantee in respect of that customer).

If permitted under the Privacy Act, we may disclose credit information or credit eligibility information about you to your employer, any other organization with whom you have any dealings, credit reporting bodies, and other traders in the markets we trade in, our commercial customers, our suppliers and to retailers of our products.

#### STORAGE AND SECURITY

We take all reasonable steps to protect personal information (including credit information and credit eligibility information) held from misuse and loss and from unauthorised access, modification or disclosure. For example, we use physical security procedures and restrict access to electronic records. Access to personal information is limited to those of our personnel who specifically need it to carry out their business responsibilities.

Where we no longer require your personal information for a permitted purpose under the Privacy Act, we will take reasonable steps to destroy it.

## **MARKETING**

We may use personal information to advise the individual concerned of new products and marketing initiatives that we think may be of interest to them. This may include product and service offerings, newsletters and general information about us.

Those who prefer not to receive information about our products and services can ask to be removed from the relevant circulation list by contacting contact us, using the details listed below.

We never disclose personal information to a third party for the purpose of allowing them to direct market their products or service on an individual, unless individuals have expressly consented to that disclosure. (For instance if a member of the public requests communication from one of Hunter Douglas third party Gallery Stores.)

### **ACCESS**

If at any time you want to know what personal information we hold about you (including credit information and credit eligibility information), you are welcome to request access to that information by contacting us, using the details listed below.

However, we may deny your request for access where:

- The access impacts on the privacy of others;
- The request for access is frivolous or vexatious;
- There are existing or anticipated legal proceedings; or
- Such access can be denied under law or by a law enforcement agency.

If we deny your request for access, we will let you know why.

We may also charge a fee to cover the reasonable costs we incur in processing your request.

# **QUALITY & CORRECTION**

At all times we strive to ensure that the information we hold about you is accurate, complete and up-to-date. If at any time you believe the personal information (including credit information and credit eligibility information) that we hold about you is incorrect, incomplete or inaccurate, you should let us know. We will use reasonable efforts to correct the information.

#### WEBSITES AND COOKIES

To ensure we are meeting the needs and wants of our website users, and to develop our online services, we may collect aggregated information by using cookies or similar electronic tools.

Cookies are small amounts of information sent from a web server to your computer. These cookies are used to retain login and location information in order to make your experience more convenient and personal. We do not use cookies to track your internet activity before or after you leave our website. No other business has access to our cookies.

We do not use this technology to access any personal information of a user in our records and a user cannot be personally identified from a cookie.

## CHANGES TO OUR PRIVACY POLICY

We may review and change this Privacy Policy at any time to take into account new laws and technology, changes to our operations, practices and business environment. We will notify you of any change by posting an updated version of our Privacy Policy on our website.

# PRIVACY CONCERNS AND COMPLAINTS

We are committed to constantly improving our procedures so that personal information (including credit information and credit eligibility information) is treated appropriately. If you feel that we have failed to deal with your personal information in accordance with this policy, the principles set out in the Privacy Act or any credit reporting code that applies to us, please contact us, using the details listed below, so we have an opportunity to resolve the issue to your satisfaction.

We will log your complaint and our privacy officer will:

- Listen to your concerns and grievances;
- Discuss with you the ways in which we can remedy the situation; and

- Put in place an action plan to resolve your complaint and improve our information handling procedures if appropriate.

NO DISCLOSURE TO OVERSEAS RECIPIENTS

We are not likely to disclose personal information (including credit information and credit eligibility information) to overseas recipients.

HOW TO CONTACT US

If you require more detailed information about our information handling practices or if you have any concerns about our handling of your personal information, please let us know by contacting us at:

**Privacy Officer** 

**Hunter Douglas Limited** 

338 Victoria Road

Rydalmere NSW 2116

Email: privacy@hunterdouglas.com.au

We will endeavour to respond to your concerns as quickly as possible.