

# GWA Group Limited Privacy Policy

GWA Group Limited and each of its wholly owned subsidiaries (collectively “GWA”, “we”, “us”, “our”) respect the privacy of information with which we are provided.

This Privacy Policy briefly tells you how we manage the personal information that we collect, hold, use and disclose.

We may amend, vary or update this Privacy Policy from time to time. Any amendments, variations or updates to this Privacy Policy will be posted on GWA’s websites.

## 1. What is personal information?

Personal information is any information or opinion about you or an identifiable individual whether that information actually identifies you or not, or information from which your identity or that of another person can be reasonably determined.

## 2. Kinds of personal information that we collect

We may collect personal information about you in the course of your dealings with us. We will only collect such information as is necessary for our business functions.

The type of personal information we collect will depend on your dealings with us. The kinds of personal information we may collect include:

- your name and contact details;
- financial information, including your credit card information or bank account details
- your birth date, occupation, gender, marital status and number of children, shirt size, frequent flyer number, information about your interests (such as sports, music, movies, cars), memberships, dietary preferences, information about your home and pets;
- social media usernames;
- publicly available information from social media websites;
- information about your role and building activities (such as whether you are a home owner, renovator, plumber, builder, or architect) and the type of projects/works; or
- other information you give us (such as information relating to an enquiry you make).

If you apply for a job with us then the personal information we collect may include your resume, qualifications, skills, education history, work history and residency status.

We generally do not collect sensitive information, however if we do we will only collect it with your consent.

From time to time, you may be able to visit our website or deal with us anonymously or by pseudonym. However, we require certain personal information to be able to provide you with the services and information you request. If you do not provide us with certain personal information, we may not be able to provide you with access to those services or respond to your request, or we may need to request that personal information at a later time.

If you provide us with personal information about a third party, you represent, and we collect it on the basis that, you have that person’s consent for us to collect and handle their personal information in accordance with this privacy policy.

## 3. How do we collect your personal information?

We may collect personal information from our customers, prospective employees, contractors, individuals from our suppliers or trading partners, and existing or possible consumers of our products and services.

We may collect personal information:

- when you visit our showrooms;
- when you attend events in person;
- when you create an account with us online;
- when you register online for an event or to attend an Experience Centre;
- through application forms on our website;
- online, when you make a purchase from us;
- when you use one of our online portals;
- when you use one of our apps;
- when you respond to a customer or trade survey;
- when you make an enquiry via our websites; or
- when you contact us by telephone or email (eg with product or general enquiries, or regarding a sale or a warranty claim).

We also collect personal information about you when you use our apps and digital tools on your mobile device and our websites. When you do so, the information we collect may include the type of device you are using and information about your usage and in some cases your location.

Where it is reasonable and practicable to do so, GWA will collect personal information directly from you. On occasions, your personal information may be collected from the following third parties:

- companies that sell or distribute our products or white papers;
- organisations that provide information on construction projects, tenders, fit-outs and contracts available in the market;
- companies that provide services to us;
- credit reporting agencies, where we request a credit report for you;
- medical practitioners; and
- previous employers, where you are applying for a job with us.

Where we collect information from a third party, we will notify you that we have collected that information.

#### **4. Why do we collect, hold, use and disclose your personal information?**

We collect, hold, use and disclose your personal information for the purposes for which we collected it, and for other related purposes that you would reasonably expect. These may include:

- to respond to your enquiries about our products and services, including providing you with the relevant technical information;
- to determine your requirements for our products and services;
- to process your registrations for events and new products;
- to process your appointments with us, including bookings for design consultations;
- to open an account for you, to enable better functionality while using our websites or apps;
- to conduct a credit check on you;
- to provide you with the products and services you request;
- to manage our relationship with you, including to provide you with post-sales support;
- to provide you with new or technical and other information in relation to our products and services;
- to invite you to functions and events, including training;
- to ask you to participate in surveys and request feedback from you, and to improve our products and services; and
- otherwise conduct our business with you.

We may also use or disclose your personal information:

- for our general business operations (eg maintaining business records, billing, complying with our legal and insurance obligations and statistical purposes);
- to comply with legal requirements and law enforcement requests;

- to investigate or prevent conduct that may be fraudulent or criminal; and
- to resolve disputes.

If you consent, we may send you promotional offers and other direct marketing material about events, products and services we believe may be of interest to you by mail, phone, fax, email, or SMS. You can opt out of receiving marketing and promotional communications at any time through any opt out method notified to you in the communication that we send to you, or by sending your request to us through the following methods:

By email: [GWAPrivacy@gwagroup.com.au](mailto:GWAPrivacy@gwagroup.com.au)

By post: GWA Privacy Officer, GWA Group Limited, PO Box 343, Liverpool NSW 187.

In some situations we may collect some additional identity information for the purpose of enabling us to verify your identity (which we may do, for example, when you enter a promotion or make an inquiry over the internet or wish to obtain copies of our price lists or catalogues).

If you do not provide your personal information, we may be unable to do one or more of the above.

## 5. Cookies

Our websites may use cookies. We do not use the information stored in those cookies to collect personal information about you. The cookies are used for statistical purposes and to assist with your use of our websites. The cookies are not used for any other purposes. You may be able to prevent your browser from accepting new cookies or disable cookies altogether by changing your browser preferences.

## 6. To whom do we disclose your personal information?

We may disclose your personal information to:

- our related companies;
- credit reporting agencies, ratings agencies and any business which provides information about the credit worthiness of persons;
- companies that sell or distribute our products;
- any entity to which we are required or authorised by law to disclose information (including but not limited to the courts, Federal or State government bodies, agencies or departments, government investigative or enforcement agencies);
- our professional advisers;
- our contractors and other service providers whom we engage from time to time to carry out, or advise on, our functions and activities (including but not limited to our IT consultants, mail service providers, external payment systems operators, survey service providers, website service providers, and digital agency partners);
- our insurers;
- where you are an employee, the administrator of any superannuation fund of which you are a member;
- your referees, including your employer;
- where you have given your consent to receive marketing communications, other organisations with whom we have alliances or arrangements for the purposes of promoting our respective products and services or the distribution or sale of our products;
- other parties that GWA has advised you of at the time any personal information is collected;
- with your consent, any other parties; and
- any person to the extent necessary, in our view in order to carry out any instruction you give to us.

## 7. Disclosure of personal information overseas

Any personal information you provide to us, including via our websites or through our applications may be collected, processed and stored by our website service provider and digital agency service provider. Our service providers will collect and process your personal information on our behalf, and disclose it to us so

that we may use it for the purposes set out in this policy. This may involve disclosure of your personal information to service providers who are likely to be located in Australia, New Zealand and India.

We also make use of cloud service providers for the purposes of data storage and enterprise management, whose servers may be located in various countries around the world.

## **8. Ensuring your personal information is up to date**

We rely on the personal information we hold about you to effectively conduct our business. For this reason, it is important that the information collected is accurate, complete and up to date. We will take reasonable steps to ensure that your information is accurate, up to date and complete. In addition, you may contact us at any time using the methods outlined below to update your personal information.

## **9. How do we hold your personal information?**

Personal information is mainly held in secure electronic databases, but we may also hold hard copies of information. We take reasonable precautions to safeguard your personal information from loss, misuse, unauthorised access, modification or disclosure.

We will take reasonable steps to destroy or permanently de-identify your personal information when we no longer require it for any purpose for which it was collected. We may retain your personal information for as long as necessary:

- to comply with any applicable law;
- for insurance and corporate governance purposes; and
- for the prevention of fraud and to resolve disputes.

Your personal information may also be retained in our IT system back-up records and will be deleted only as part of our usual data retention and refresh policies.

The transfer of data over the internet is inherently insecure. We cannot guarantee the security, during transmission, of any personal information provided to us via our websites. Please bear this in mind when transmitting information by this means to us.

## **10. Access to and correction of your personal information**

You may lodge a request to correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading, in which case please contact our Privacy Officer via the contact details shown below.

You may request that we provide you with access to the personal information we hold about you. Generally, we will provide you with access, except in limited circumstances where the law permits us to deny access. Any such requests must be made in writing to us via the details shown below.

If we refuse to give you access or update your personal information, we will provide you with the reasons for our refusal.

## **11. How to notify us of your concerns or lodge requests for access**

If you:

- would like more information about our Privacy Policy;
- would like more information about the way we manage the personal information we hold;
- have a concern about how we deal with your personal information;
- wish to lodge a request for access to or updating of your personal information; or
- wish to ask us not to send you promotional offers and other marketing material,

you can do this by:

- Writing to GWA Privacy Officer, GWA Group Limited, PO Box 343, Liverpool NSW 187; or

- Sending an email to: [GWAPrivacy@gwagroup.com.au](mailto:GWAPrivacy@gwagroup.com.au).

## **12. How can I make a complaint?**

If you have a complaint about the way that we have handled your personal information, you may lodge a complaint by:

- Writing to GWA Privacy Officer, GWA Group Limited, PO Box 343, Liverpool NSW 187; or
- Sending an email to: [GWAPrivacy@gwagroup.com.au](mailto:GWAPrivacy@gwagroup.com.au).

All complaints are reviewed and considered by the GWA Privacy Officer. We will generally respond to complaints within 30 days, or within timeframes otherwise required by law.

## **13. What if I'm not satisfied with GWA's response?**

If you are not satisfied with the result of your complaint to GWA, you can refer your complaint to the relevant Privacy Commissioner.

In Australia, the Office of the Australian Information Commissioner can be contacted by:

- Emailing [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).
- Telephone – 1300 363 992; or

In New Zealand, the Office of the Privacy Commissioner can be contacted by:

- Telephone +64 4 474 7590; or
- Writing – Office of Privacy Commissioner, PO Box 10094 Wellington 6143