

# Privacy Policy

## 1. Our commitment

This privacy policy sets out how Davey Water Products Pty Ltd (Davey) handles your personal information. Personal information is any information about you where your identity is apparent, or can reasonably be ascertained, from the information.

This Privacy Policy will provide detailed information on when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

Our website may contain links to third party websites. We are not responsible for the privacy policies of any third party websites. We recommend that you review the privacy policy of each website you visit.

## 2. Collection of personal information

### 2.1 Information we collect from you

The amount of personal information we collect about you depends on how you interact with us. We will collect personal information from you if you:

- Browse, make an enquiry, contact us, subscribe or otherwise interact on our website
- apply to become a user of our Davey website
- contact us by telephone or correspond with us
- order a product (including via Davey's website)
- make a product complaint or warranty enquiry
- complete an application or enter into an agreement
- call our Customer Service line
- attend a conference or seminar
- enter a promotion or competition

The type of personal information we collect may include:

- Contact information such as your name, job title and home or business address, email address, telephone, mobile phone number and facsimile number;
- Payment data, as required to process payments and fraud prevention;
- Your password for the Davey Dealer website;
- Details of your visits to our premises;
- Other personal data, based on your consent, in connection with registration to events or seminars such as dietary requirements or disabilities.

Where we request information from you, we will generally state the purpose(s) for its use and to whom it may be disclosed.

### 2.2 Credit reporting information

Davey also collects financial and trading information in order to establish and manage business and customer relationships. This information is securely held for internal accounting and administration purposes associated with the provision of products and services (including the extension of commercial credit) to customers and in order to enhance our business relationship and level of service.

Collection of commercial credit information is undertaken only with consent. To complete an application to open an account or extend commercial credit we may ask you to provide information including your: ABN, business name, date of birth, driver's license

number, business type and structure, trading history and commercial trade references. We may also ask for the name and contact details of fellow directors (if you are a corporate client) which you must ensure you are entitled to disclose, and is with the consent of the individual, for the purposes described in this clause.

Davey may receive commercial credit information about you from a credit reporting body (such as Veda or Dun & Bradstreet), or trade referees nominated by you. Davey may also disclose limited commercial information about you to third parties where you have nominated Davey as a trade reference, solely to fulfil this purpose. Commercial credit information will be used to assess your credit worthiness and for any other permitted purposes agreed by you as set out in our Credit Account Application form.

To the extent that you are an unincorporated entity, this is personal information covered by this policy. Information about corporate retail customers, which is about an identifiable person, is also personal information covered by this policy. Davey does not have a practice of collecting or holding consumer credit information covered by the Credit Reporting Privacy Code.

Enquiries for access to or correction of commercial credit information or credit eligibility information, or complaints about the failure of Davey to comply with the relevant credit reporting privacy legislation (if this binds Davey), can be made as set out below at sections 5 and 9.

### **2.3 Websites and Social Media**

We use cookies to improve the functionality of our website, not to store any of your personal information. A cookie is a small amount of information which is transferred to the hard drive of your computer which can identify your web browser but not you. We make limited use of “cookies” technology on our websites including to track user experiences, build anonymous statistical data about how our website is performing, and to power the personalisation of website content to you. If you want to, you can disable your web browser from accepting cookies. If you do, you can still access our website, but not all services may be available.

To customise your user experience on our website we may provide you with the opportunity to connect, access and/or interact with third-party social networking services, such as Facebook, Twitter, Google+ and Pinterest. If you participate in one of our promotional campaigns through these third-party social networking services to, you are authorizing Davey to access and use certain information from your social network profile. You can opt-out of authorising Davey from collecting or accessing your information when you are not using the application and you can cancel this service at any time by deleting the application from your social network account.

### **2.4 Information we collect from other parties**

We may also collect information about you from other parties such as:

- credit reporting agencies – for the purpose of ascertaining or assisting others as to your creditworthiness where you have consented to this (refer to 2.2);
- our dealers including our Authorised Warranty Service Dealers – to ensure that warranty claims have been managed appropriately.

### **2.5 Sensitive information**

We do not collect sensitive information such as your race, religion, beliefs or sexual preference except where you have consented or where we are permitted or required by law to do so. We do not typically collect such information.

### **2.6 What happens if you choose not to provide the information?**

You do not have to give us your personal information. However, if you choose not to, we may not be able to provide you with our full range of support and services. You can generally visit our website without telling us who you are or revealing other personal information.

### **3. Use of personal information**

We collect personal information from you for a number of reasons, including to:

- sell and deliver our products and services to you (including applications for credit);
- manage warranty claims and provide after sales service and repair;
- analyse and improve our goods, services and communications to you;
- send you information about our products and services;
- respond to your questions or requests for help or information;
- assist us forecast the future demand for our products and services;
- analyse our website usage and enhance the content of our website;
- keep a record of our dealings with each other including to manage and administer our business relationship through the processing of payments, accounting, auditing, billing and collection and support services;
- protect the security of and manage access to our on-line and physical premises;
- comply with legal and regulatory obligations.

### **4. Disclosure of personal information**

Davey recognizes the trust you place in us when you give us your personal information and so will not give your personal information to third parties unless:

- you have given us your consent to do so;
- it is necessary for us to do so to fulfil the primary purpose(s) for which we collected your personal information;
- it is for a related purpose which you would reasonably expect us to do; or we are required to do so by law.

The third parties we will typically share your personal information with include companies in our own corporate group, Davey dealers or other distributors of Davey products, your authorised representatives and service providers which we use to conduct our business, functions and activities. These organisations may be involved or conduct:

- mailing, shipping or courier operations;
- collection points for Click & Collect purchases;
- information technology services;
- legal, auditing, accountancy or other professional services;
- credit reporting services;
- promotions and competitions;
- repair, installation or maintenance services;
- insurance services;
- market research and social media support;
- billing and debt collecting functions;
- website usage analysis.

We will take reasonable steps to ensure that your personal information is disclosed to such third parties in accordance with this privacy policy and on a confidential basis.

If we transfer personal information to countries outside Australia we will only do so in compliance with the applicable Australian data protection and privacy laws and if we

reasonably believe that the information will remain subject to principles for fair handling of the information which are substantially similar to the applicable privacy laws. Some of Davey's databases are stored in servers located outside Australia – in countries such as the United States and Japan.

## **5. You can access and correct information**

We will take all reasonable steps to ensure that your personal information which we collect, use or disclose is relevant, accurate, complete and up-to-date. We appreciate you assisting us by letting us know if your personal information has changed.

If you wish to access, or correct, the information we hold about you, please contact our Privacy Officer who may ask that your request be made in writing. We will endeavour to respond to your request within a reasonable time (usually 30 days). A handling fee may be payable so that we can obtain the information you require.

## **6. Right to refuse access or correction**

We reserve our right to refuse your request for access or correction if, for example, we consider your request to be frivolous or vexatious.

If we refuse your request, we will give you our reasons in writing. If we refuse your request to correct information we hold about you, we will give you the opportunity to post a statement of your claim where we hold your personal information.

## **7. Security**

The security of your personal information is of great importance to us, and we will take reasonable steps to:

- keep your personal information secure in a combination of secure computer storage, hard copy files and other access-controlled records; and
- ensure your personal information is protected from misuse, interference, loss and from unauthorized access, modification or disclosure.

We will endeavour to destroy or de-identify your personal information when it is no longer needed for the purpose for which it was provided, unless a legal exception applies.

## **8. Updating our Privacy Statement**

As our company grows and changes, we may revise our Privacy Policy. We reserve the right to change this privacy policy at any time by posting an updated version on our website at [www.davey.com.au](http://www.davey.com.au). The changes will take effect as soon as they are posted on this website.

## **9. Complaints and further information**

If you have any complaints or would like further information about our privacy policy and practices please contact our Privacy Officer.

The Privacy Officer

Street & Postal Address: 6 Lakeview Drive, Scoresby 3179, Australia

Telephone: +61 3 9730 9215

E-mail: [privacy@davey.com.au](mailto:privacy@davey.com.au)

If we become aware of any ongoing concerns or problems, we will take these issues seriously and work to address these concerns with you. If, however, you are not satisfied with our response, you may contact the offices of the Information Commissioner on 1300 363 992.

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