

PRIVACY POLICY

DOC 0402

Effective:	1 Nov 2019
Rev No:	2.0

Rexel Holdings Australia Pty Ltd acts as agent for its wholly owned subsidiaries including Rexel Electrical Supplies Pty Ltd and Australian Regional Wholesalers Pty Ltd. Together, we are bound by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles. Terms used in this Privacy Policy have the meaning given to them in the Privacy Act unless otherwise defined here.

This Privacy Policy sets out how we handle your:

- personal information (any information or opinion about you or information from which you can be identified); and
- credit information, credit eligibility information, and information derived from that information.

For the purposes of this privacy policy, 'personal information' refers to all of the above types of information.

What information do we collect and how do we collect it?

We collect information from you when you apply for an account with us, register on our website, place an order for our products or services, submit a warranty claim or return, make contact with us, or subscribe to receive our marketing material.

When applying for an account, you need to provide your ABN or ACN for your business. If you operate the business as a sole trader or partnership, you will also need to provide identifying details such as your date of birth, residential address, and a copy of your photo ID.

When ordering or registering on our website, as appropriate, you may be asked to provide identifying details such as your name, e-mail address, mailing address, phone number, company, and payment type.

In appropriate cases, we may collect personal information about you from third parties, such as your employer or your referees if you apply to work for us.

If you (or your employer) apply for commercial credit, or you agree to act as guarantor, we may collect information about you from third parties (for example, from your employer, service providers, agents, advisers and brokers). We may also collect credit information and credit eligibility information about you from you, other trade credit providers and credit reporting bodies.

Credit information and credit eligibility information we collect includes identification information (such as date of birth, resident address and a copy of your photo ID), the fact that we have made an information request in respect of you, the fact you have applied to act as guarantor, the type and amount of commercial credit sought, information about a judgement of an Australian court in relation to credit provided to you, bankruptcy/insolvency information in relation to you, and publicly available information about you that relates to your creditworthiness in Australia or its external territories. It also includes information we derive from the above categories, such as an estimate of your creditworthiness.

While you may visit our website anonymously, it may not be possible to do so where you wish us to provide our products or services to you. You are not required by law to provide us with any specific personal information. However, if you do not

provide us with sufficient personal information, we may be unable to provide you with our products or services.

What are our purposes for handling your personal information?

Any of the information we collect about you may be held, used or disclosed for the following purposes:

- To provide our products and services to you, including commercial credit;
- To assess your creditworthiness and credit application, manage our ongoing trading relationship, assist you with credit queries, comply with legal obligations on us, participate in the credit reporting system, manage purchase orders, recover overdue amounts, and deal with complaints and assist other credit providers to do the same;
- If you are agreeing to act as a guarantor in respect of a credit application, to assess your creditworthiness, manage our ongoing trading relationship, recover overdue amounts and deal with complaints and assist other credit providers to do the same;
- To personalise your experience (your information helps us to better respond to your individual needs);
- To improve our websites (we continually strive to improve our websites' offerings based on the information and feedback we receive from you);
- To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs);
- To process transactions and orders;
- To respond to your enquiries;
- To comply with legal and regulatory requirements;
- To administer a contest, promotion, survey or other site feature if you choose to participate;
- If you have previously purchased products or services from us and have not withdrawn your consent, to send (including via email) information about events, products and services (including those of third parties) that we think may be of interest to you;
- In accordance with the law or any consent you provide;
- To assess an application for commercial credit or account and establish, provide and administer that commercial credit or account; and
- For a purpose you would otherwise reasonably expect.

The email address you provide for order processing may be used to send you information and updates pertaining to your order. Unless you tell us not to, we may also send company news, updates, related product or service information to your email address.

Note: If at any time you would like to unsubscribe from receiving future marketing emails, we include unsubscribe instructions at the bottom of each email or you can contact us as set out below.

How do we protect your personal information?

We implement a variety of security measures to maintain the safety of your personal information stored with us.

We hold your personal information in paper-based and

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electronic files. We seek to ensure that your personal information which is kept in our files is protected from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

Only authorised personnel have access to your information through our customer management systems. Your information is treated with respect and only accessed when necessary. When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we ensure that it is destroyed or de-identified.

Where your information is collected via our website, we use a secure server. All credit information you provide is transmitted directly to our credit reporting bodies. Payment information is sent to our third party payment gateway vendor (who ensures Payment Card Industry compliance) via transport layer security. Other information is protected by 256 bit encrypted Secure Socket Layer (SSL) technology. Personal information is accessible by those authorised with special access rights to such systems, and are required to keep the information confidential.

We do not receive a copy of your credit card information through the website.

If you provide us with your credit card information over the phone, we provide it to our third party payment gateway vendor.

Do we use cookies when you visit our website?

Yes. Cookies are small files that a website or its service provider transfers to your computer's hard drive through your web browser (if you allow) that enables the website's or service provider's systems to recognise your browser and capture and remember certain information about you as a unique user, such as your personal preferences and user data. Cookies do not identify you by name.

We use cookies to help us remember and process the items in your shopping cart and understand and save your preferences and user data for future visits.

If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies via your browser settings. Like most websites, if you turn your cookies off, some of our services may not function properly. However, you can still place orders in the online store without the use of cookies.

We may use Google AdWords® Remarketing to advertise across the Internet. Google AdWords® Remarketing displays relevant ads tailored to you based on what parts of our website you have viewed by placing a cookie on your hard drive. This cookie does not personally identify you. The cookie is used to say "This person visited this page, so show them ads relating to that page." Google AdWords® Remarketing allows us to tailor our marketing to better suit your needs and so that you see ads that are relevant to you. If you do not wish to participate in Google AdWords® Remarketing, you can opt out by visiting Google's Ads Preferences Manager.

Do we disclose any information to outside parties?

We may disclose your personal information to our related companies, business partners and suppliers (including delivery providers, data analytic service providers, payment processors, e-commerce platform hosts and intermediaries, and manufacturers in respect of returns and warranty claims), government or regulatory authorities (where required or authorised by law), our external service providers (such as our professional advisers, including accountants, auditors and lawyers) and our agents and representatives. This may include the disclosure of your personal information to our parent company located in France and to our third party servers and software providers located in Singapore and the United States of America. Otherwise, we do not usually disclose your personal information to overseas recipients.

We do not expect to disclose credit information or credit eligibility information to entities that do not have an Australian link.

Where appropriate, we seek to ensure that these third party organisations are bound by confidentiality and privacy obligations to protect your personal information.

We do not sell or trade your personally identifiable information. We may however, release your information when we believe release is appropriate to comply with the law, enforce our website policies, or protect our or other's rights, property, or safety.

However, anonymous or de-identified information that we collect may be provided to other parties, including for marketing, advertising, or other uses (but not direct marketing).

Exchanging your credit information with credit providers, credit reporting bodies and others

We may disclose credit information and credit eligibility information about you, including if you agree to act as a guarantor, to credit reporting bodies and other credit providers with an Australian link to assess an application by you for credit, to notify them of a default by you and to inform other credit providers who allege you are in default with them. We may disclose your information to any person reasonably necessary for the purposes of that person taking an assignment of any contract the lender has with you.

You have the right to request credit reporting bodies not to use credit reporting information for the purposes of pre-screening or direct marketing by a credit provider, or if you believe on reasonable grounds that you have been, or are likely to be, the victim of fraud.

Which credit reporting bodies do we exchange credit information with?

The credit reporting bodies we use include illion (Australia) Pty Ltd, Equifax Pty Ltd and Creditworks Australia Pty Ltd, whose privacy and credit reporting policies and contact details are set out at www.illion.com.au and www.equifax.com.au and www.creditworks.com.au. Their policies set out how you may access or correct information held by them; how you may make a complaint against them and how they will respond to

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the complaint. They may include information we disclose to them in reports to other credit providers.

Equifax may disclose personal information to an entity located overseas, including in South Africa, the Philippines, China, UK, NZ, Poland, Israel, Germany, Singapore and the United States of America.

Illion may disclose personal information to entities located overseas, including in New Zealand.

Creditworks may disclose personal information to entities located outside Australia if requested by us or otherwise in accordance with their privacy details.

Your rights in respect of credit information exchanged with credit reporting bodies

You can ask a credit reporting body not to use or disclose credit information it holds about you for a period of 21 days (called a "ban period") without your consent if you believe on reasonable grounds that you have been or are likely to be a victim of fraud, including identity fraud. When you apply for credit, you are taken to agree to us accessing your personal information (including credit-related information) held with a credit reporting body, even if there is a ban period in place, for the purposes of assessing an application for credit or in order to collect overdue payments.

Accessing personal information

You may request access to the personal information (including any financial or credit information) that we hold about you by contacting us as set out below.

If we refuse access, we will provide you with a written notice which sets out the reasons for refusing.

We may recover our reasonable costs for responding to a request for access to personal information. We will advise you of these estimated costs in advance.

Correcting personal information

We seek to ensure that the personal information that we collect, use and disclose is accurate, up to date and complete and, in the case of use and disclosure, relevant for the purposes for which it is collected. Where we believe that the personal information we hold is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information.

If we do not agree to correct the information, we will provide you with a written notice setting out the reasons for refusing. You may ask us to associate a statement with your personal information in respect of the matter.

You can contact us with corrections or edits to your personal information (including financial or credit information) by contacting us as set out below.

Complaints

We encourage you to contact us as set out below in the first instance if you have any complaint in relation to your information. Complaints are reported to our governance committee and we endeavour to respond within a reasonable time.

You may also contact the Office of the Australian Information Commissioner at:

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Postal: GPO Box 5218, Sydney NSW 2001

Changes to our Privacy Policy

We may make changes to this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our website.

This policy was last modified on 1 November 2019.

Contacting Us

If there are any questions regarding this privacy policy you may contact us using the information below.

Level One, Building B, 12 Julius Ave, North Ryde NSW 2113 Australia

Telephone: 1300 310 152

Email: marketing@rexelha.com.au

Website: www.rexel.com.au