

# 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.

Davey's privacy policy is based on openness. Where we request information from you, we will generally state the purpose(s) for its use and to whom it may be disclosed.

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.

We are committed to preserving the privacy of your personal information and complying with the Privacy Act 1993 as amended. In particular, Davey will comply with the New Zealand Privacy Principles contained in the Act. This Privacy Policy explains some of these Principles and how they may apply to you.

## 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:

- apply to become a user of our Davey website
- contact us through our website using an on-line form
- order a product
- subscribe to one of our mailing lists
- make a product complaint or warranty enquiry
- correspond with us, including by email or letter
- complete an application or enter into an agreement
- call our Customer Service line or
- enter a promotion or competition.

The type of personal information you may provide to us includes your name, address, email address, telephone, mobile phone number, facsimile number.

By providing your personal information to Davey in this way, including by completing on-line forms and email, you agree to the collection of that information in accordance with this privacy policy.

### 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.

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 only be used to assess your credit worthiness. It will not be used for the purposes of pre-screening of direct marketing by a credit provider, and will not be intentionally disclosed to entities outside New Zealand.

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 Privacy Act 1993 or the Credit Reporting Privacy Code (if this binds Davey), can be made as set out below under "Access and Correction" and "Queries and Complaints".

### **2.3 Web sites 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. 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.

#### **2.4.1 Davey Water Products Warranty Privacy Collection**

This privacy collection notice sets out how Davey Water Products Pty Ltd (Davey Water) will use your personal information in accordance with the Privacy Act 1993. By submitting your details using this form, Davey Water is collecting your personal information for warranty and service purposes. Davey Water may disclose this information to third parties who are involved in the assessment of warranty claims, such as the inspection and repair of faulty products and the delivery of products. If you do not provide Davey Water with your personal information we will not be able to properly investigate or resolve your complaints. If you have any questions or if you would like to access your personal information held by Davey Water please contact us at [privacy@davey.com.au](mailto:privacy@davey.com.au)

## **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:

- deliver our products and services to you (including applications for credit);
- manage warranty claims;
- provide after sales service and repair;
- provide helpline assistance;
- improve our service;
- send you direct marketing material;
- respond to your questions or requests for 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; and
- comply with legal 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, 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;
- 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;
- 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 New Zealand, we will only do so in compliance with all applicable New Zealand 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 New Zealand privacy laws.

## **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 Compliance Officer who may ask that your request be made in writing. We will endeavor 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 and notify you by posting an updated version on our website at [www.davey.com.au](http://www.davey.com.au)

## **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 Compliance Officer.

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 Office of the New Zealand Information Commissioner on 0800 803 909.

Davey is a wholly owned subsidiary of GUD Holdings Limited.

Privacy Compliance Officer:

James Coad

Human Resources Manager

Telephone: +61 3 9730 9222

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