

Privacy Statement

Privacy Policy* – Australian Construction Products Pty Limited ABN: 63 091 618 781

1 What is this Privacy Policy about?

Fletcher Building Limited, Fletcher Building (Australia) Pty Ltd (ABN 11 093 539 452) and our related bodies corporate including **Australian Construction Products Pty Limited ABN: 63 091 618 781**, (“us, “we” and “our”), respect your rights to privacy under the Privacy Act 1993 (NZ) and Privacy Act 1988 (Cth) (together referred to as the **Privacy Act**) and we comply with all of the Privacy Act’s requirements in respect of the collection, management and disclosure of your personal information.

This Privacy Policy describes how we collect, use and manage personal information. We collect the personal information we need to provide our products, information to our customers and for our business operations. Credit information will be dealt with in accordance with this Privacy Policy and the Credit Reporting Policy applicable at the time of your application for commercial credit.

2 What is your personal information?

When used in this Privacy Policy, the term “personal information” has the meaning given to it in the relevant Privacy Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

3 What kinds of personal information do we collect and hold?

The personal information that we collect and hold includes the following:

- name, address and contact details;
- date of birth;
- employment history, educational qualifications and income details;
- government related identifiers (eg. IRD and tax file number and driver’s licence information);
- financial information;
- details of the products and services provided to you by us; and
- other personal information you voluntarily provide to us during the course of transacting with us.

We may also collect sensitive information, such as membership of a trade union or professional association, and health information in respect of contractors and prospective employees. We will only collect this type of personal information with your consent.

4 How do we collect your personal information?

We usually collect personal information directly from you unless it is unreasonable or impracticable to do so or unless otherwise expressly authorised by you. When we collect personal information, we may do so when you communicate or interact with us, such as when you:

- engage with us via correspondence such as purchase orders, requests for quotes, telephone conversations and emails;
- make inquiries about us, our products and services or contact us for any other reason so that we can process, deal with and respond to your queries or other issues including any complaints;
- contact, register with, post to, like or follow any of our social media websites, pages, forums or blogs;
- apply for commercial credit;
- use or register on our website;
- register a product you have purchased or subscribe to any of our services (including loyalty programmes);
- register for or attend any of our events;
- make applications for prospective employment and contracting opportunities with us; or
- subscribe to a newsletter, fill out a form or survey, enter or participate in any competitions or promotions.

The collection of personal information on our website, via promotions or our social media pages will be clear from the context (e.g. request to complete information fields) or will state that personal information is being collected at the point of collection.

In addition we may collect information through click tracking (in relation to your use of our website including the content you access and any services you utilise) and through log files or cookies (as further detailed below).

In some instances we may collect personal information about you from third parties, such as wholesale and retail suppliers of home building, renovating and design related products, where you have made inquiries about our products to the third parties. Also, we may collect personal information about you from recruitment agencies, marketing agencies, labour hire providers or from third party medical service providers (which provide medical reports and services to us). In such circumstances, we are relying on the third party to have obtained your consent. We may also collect your personal information from publicly available resources.

5 What happens if you do not provide your personal information to us?

If you do not provide personal information that we request in connection with our business functions and activities, we may not be able to provide some or all of our products or services to you or be able to respond and assist in the manner required. We also may not be able to provide you with information about products and services that you may want.

6 How we hold your personal information?

All personal information you provide to us is stored on secure servers. We use a variety of security techniques, including encryption and authentication, to help with the protection and maintain the availability, security and integrity of your personal information.

We are committed to protecting your information through the following measures:

- restricting access to your personal information to only those who need to use it for the relevant purpose;
- transferring your personal information only in encrypted form;
- preventing unauthorised access to IT systems by using firewalls; and

- permanent monitoring of IT systems to detect and stop misuse of personal information.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

7 Why do we collect, use, hold and disclose your personal information?

We collect, use, hold and disclose your personal information for the following purposes:

- to provide our products and services to you, including information and all services relating to our products and services;
- to record information regarding products purchased from us and to provide further services to you, such as product warranties and guarantees, and repair or replacement of products;
- to assist in providing better products and services to you by tailoring them to meet your needs;
- to provide you with access to protected areas of our website;
- to assess the performance of the website and to improve the operation of the website;
- to keep our websites and other online presence relevant and of interest to you, for direct marketing including promotions, newsletters and competitions, to show you advertising and information that is most relevant to you and your interests, and to carry out analysis of market activity, market research and surveys;
- for promotional and industry activities and functions (including training seminars);
- for verification of your identity for use of our website or to conduct address verification or credit checks for invoicing and billing purposes;
- to provide you with further information about us or other websites or goods or services offered by us or our related companies or which we consider may be of interest to you;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for contracting with you and assessing you for employment and contracting purposes;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you;
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country; and
- any other purpose which is stated to you at the time of collection or that you otherwise authorise.

8 Who will we disclose your personal information to?

We may disclose personal information to the following parties:

- our employees, related companies and affiliates;
- third party contractors and providers of goods and services, such as courier and delivery companies, marketing and promotion companies, training and training certification agencies, web analytics services, business support services, and information technology service providers;

- market research companies who undertake customer surveys for us;
- industry bodies or buying groups of which you may be a member;
- insurance companies;
- professional service firms providing services to us, such as legal or accountancy services;
- authorised third party providers of information assurance services;
- law enforcement agencies or regulatory agencies where required or authorised by or under a law or a court or tribunal;
- any entity where required or authorised by or under a law or a court or tribunal;
- third parties as set out in the credit reporting policy applicable at the time of opening your trading account; and
- any other recipient which is notified to you at the time of collection or that you otherwise authorise.

9 Do we disclose personal information overseas?

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to the following overseas recipients for some of the purposes listed in section 7:

- our employees, related companies and affiliates;
- third party service providers of data storage and processing services; and
- third party contractors and providers of goods and services.

These recipients may be located in Australia, New Zealand, USA, China, Singapore, United Kingdom, Europe & South Africa. This may change from time to time, including as a result of change of provider, changes in data protection practices and processing efficiency.

10 Do we use cookies or other web tracking systems?

We track traffic patterns on our website through the use of cookies. A "cookie" is a small amount of information which is transferred to the hard drive of your computer and which can identify your web browser, but not you.

You can disable your web browser from accepting cookies if you wish. If you do so, you can still access our website, but not all services may be available.

We may automatically collect general statistical information on our website about visitors to our website, such as IP addresses, browsers used, dates visited, pages visited and number of visitors. However, such information does not refer to you by name or your contact details. We use this data in aggregate to improve our website. We may provide such aggregated data to third parties, but in so doing, we do not provide personal information without your consent.

Our website or other online presence may contain links to a variety of advertising and third party websites. Some of these links may request or record information from users or use cookies or other methods to collect information from you. We have no control over the content or personal information management of these sites. We encourage you to review the privacy policies of these sites before engaging in any activity with them.

11 Direct marketing

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent using various methods including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). You consent to us sending you those direct marketing communications by any of those methods. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

We do not provide your personal information to other organisations for the purposes of direct marketing.

12 Dealing with us anonymously or by using a pseudonym

You may deal with us on an anonymous basis or by using a pseudonym when making inquiries through our website or social media pages, or when you make general inquiries by telephone and do not require a further response from us. However, we may need certain contact details from you to respond to inquiries. Generally, we will require your personal information in order to transact with you.

13 Access and correction of your personal Information

You have the right to access your personal information which we hold about you, subject to some exceptions. Before we provide you with access to your personal information we may require some proof of identity. We may charge a reasonable fee for giving access to your personal information if your request requires substantial effort on our part. However, we will not charge you for simply making a request. If you wish to access the personal information we hold about you, please contact us using the details provided in section 17.

You also have the right to request that we correct any inaccurate personal information we hold about you, subject to some exceptions. If you wish to correct the personal information we hold about you, please contact us using the details provided in section 17.

If we do not agree to your request to provide you with access to your personal information or to amend your personal information, we will inform you of our decision within a reasonable period. If you wish to complain about this outcome or to attach a statement to your record that you believe the personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, please see our complaints procedure in section 14.

14 Complaints

You may request further information about the way we manage your personal information or lodge a complaint by contacting our Privacy Officer using the contact details in section 17.

We will deal with any complaint by investigating it, and providing a response to you within a reasonable time, provided that we have all necessary information and have completed any investigation required. In some cases, we may need to ask you to put your complaint in writing so that we are sure that we understand it, and may also need to ask you for further information or to verify your identity. In cases where further information, assessment or investigation is required, we will seek to agree an alternative timeframe with you.

If you are dissatisfied with the outcome, please contact us. Alternatively, you may take your complaint to the relevant Privacy Commissioner at either the Office of the Privacy Commissioner (NZ) or the Office of the Australian Information Commissioner (OAIC). The contact details for the Privacy Commissioner are available from its website at www.privacy.org.nz and the contact details for the OAIC are available from the OAIC's website at www.oaic.gov.au.

15 Change of ownership

In the event of a change of ownership of all or a portion of our business or the website, your personal information may be transferred to the new owner so that the business and/or website can continue operations.

16 Amendments

We may amend this Privacy Policy at any time. Amendments to this Privacy Policy will be posted on our website and will be effective when posted. Please check our Privacy Policy regularly for updates and amendments.

17 Contact details

If you have any questions about this Privacy Policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact our Privacy Officer using the details set out below.

Privacy Officer
Fletcher Building (Australia) Pty Ltd
Locked Bag 3501
NORTH RYDE BC NSW 1670

Alternatively, you can email us at privacy.acp@acprod.com.au or call us on +61 2 8708 4400.

* As amended June 2019.