

PRIVACY POLICY

Houghton Leisure Products Pty Ltd ACN 609 139 880 ('we', 'our', 'us') is committed to protecting the personal information that we collect and hold about you. This Privacy Policy (**Policy**) sets out how we collect, use and share your personal information and how to contact us with any queries or concerns with reference to the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) as far as practicable.

By voluntarily supplying us with your personal information you are agreeing to be bound by this Policy. While we may update our Policy from time to time, the most recent version of this Policy will always be available on our website. If we change the Policy in any material way we will post a notice on our website along with the updated Policy. We may also contact you via your contact information on file, for example by email, notification or some other equivalent measure.

If you have any queries, concerns or complaints about how we handle your personal information, please contact our Privacy Officer in the first instance:

Privacy Officer Contact: Bruce Henshall
Email: contact@houghtonleisure.com

Postal address:
Attention: Privacy Officer
Houghton Leisure Products Pty Ltd
37A Humphries Tce,
Kilkenny SA 5009
Australia

Our website may contain links to other websites. When a user clicks on a link to another site they are no longer subject to this Policy.

1. What types of information do we collect and why?

In the course of providing our goods and services to you, we may collect personal and other information about our customers and suppliers and how they interact with us, our goods, and our services. We collect personal information through a number of mechanisms, including:

1.1 Collection from you: we collect and store information you provide directly to us (either in person, by email, by phone, or by any other direct means) in order to deliver our goods and services. This includes:

- Contact information: such as your name, address, email address, telephone number;
- Personal information: such as date of birth and driver's licence details;
- Financial and credit information: such as your payment information (credit card, bank account, etc);
- Business details: such as your Australian Business Number; and/or
- Credit information: such as type and amount of credit sought, default information, repayment history information, payment information relating to overdue payments.

1.2 Automatic: we use cookies (small text files stored on your devices that provide us with information such as your internet protocol (**IP**) address, server information, internet service provider, and information on how you interact with our website) and other services that allow us to understand how you use our online media. This information is not linked to you personally.

- 1.3 Device:** if you use our services or interact with us through a mobile device, we receive technical information about your device, numbers that identify the device and you location information. This information is not associated with you.
- 1.4 Communications:** when you communicate with us, we collect information such as your contact details (such as email address or phone number). We may also engage third party services that provide us with information about how you interact with some communications we distribute. You can elect to not receive communications from us by contacting our Privacy Officer.
- 1.5 Through other sources:** where necessary, we also collect your information from publicly available records. This can include information relating to an individual's credit worthiness and other information from credit providers, subject to legal restrictions. Where appropriate and necessary to do so we use collect information from public records such as those maintained by the Australian Securities and Investments Commission, Australian Financial Security Authority (PPSR), and land titles offices in each state. We may do this where it is unreasonable or impractical to collect this information from you.

If you have previously applied for a position with us we may have received your personal information from third parties such as recruiters or external websites. We use the information we receive to contact you about any potential opportunities or to evaluate your candidacy.

You have the option of not identifying yourself or interacting with us using a pseudonym. However, this may not be practicable when engaging our services or purchasing our goods.

2. How do we use your information?

We will only use your information for the purposes for which it was collected (**primary purpose**) or a purpose related to that primary purpose if it would be reasonably expected by you or where we have separately obtained your consent.

We use personal information for the primary purpose of providing our goods and services to our customers.

How we use the information we collect depends, in part, on which services you use, how you use them and any preferences you have communicated to us. If you would like to restrict how your personal information is handled beyond what is outlined in this Policy, please contact our Privacy Officer.

2.1 Disclosure of personal information to third parties

We may disclose your information to third parties who assist us in providing, managing and administering our goods and services. We will also disclose your personal information where such disclosure is required by law.

We may disclose your personal information to third parties that:

- Deliver products to you;
- Manage and enhance our customer database;
- Process information;
- Assess your interest in our products or services;
- Conduct customer research or satisfaction surveys;
- Send marketing information to you on our behalf;
- Other organisations listed as trade references in a credit application; and
- Other purposes related to the above.

We will not sell or license your information to third parties or otherwise disclose your personal information unless we believe on reasonable grounds that you have provided your authorisation. In certain circumstances we may be required to disclose your personal information without your consent in order to comply with any court orders, subpoenas or other legal process or investigation including by tax authorities, if such disclosure is required by law. Where possible and appropriate, we will notify you if we are required by law to disclose your personal information

2.2 Disclosure of credit information to third parties

We do not disclose your credit information to any credit reporting bodies.

3. How do we store and secure the information we collect?

We store your personal and credit information as physical files in a secured area or on our electronic data base system and on computers with appropriate back up and security systems.

3.1 Security and management of personal information

We will take reasonable steps to protect the personal information we hold from misuse, loss, and unauthorised and accidental access, modification, disclosure, destruction, or other action which prevents or otherwise hinders our access to your personal information on a temporary or permanent basis. We do this by:

- Putting in place physical, electronic and procedural safeguards in line with industry standards;
- Requiring any third party providers to have acceptable security measures to keep personal information secure;
- Limiting access to the information we collect about you;
- Imposing confidentiality requirements on our employees; and
- Only providing access to personal information once proper identification has been given.

While we take all steps reasonable in the circumstances to protect your information, in the unlikely event a data breach occurs, in the unlikely event of a data breach we will notify you.

Where there is a risk of serious harm arising from the breach, we will notify you and any relevant authorities.

We will only keep your personal information for as long as we require it for the purpose for which it was collected. However, we may also be required to keep some of your personal information for specified periods of time, for example under certain laws relating to companies, money laundering and financial reporting legislation. If we no longer require your personal information, and are not legally required to retain it, we will take reasonable steps to destroy or de-identify the personal information.

3.2 Sending information overseas

Personal information may be sent overseas in limited circumstances. We send personal information to:

- our manufacturers which have access to contact information to enable their role in manufacturing and shipping our products; and/ or

- External service providers that assist our organisation such as with internal operations (including training, website hosting or cloud storage), market research and the distribution of newsletters, standards and other publications.

We take all steps reasonable in the circumstances to ensure that those we disclose personal information to overseas protect your information. This includes the use of contractual arrangements to control how third parties use and handle personal information overseas.

4. How to access and control your information?

4.1 Accessing the information we hold about you

Under the APPs you may be able to obtain a copy of the personal information that we hold about you. To make a request to access this information please contact us in writing. We will require you to verify your identity and specify what information you wish to access. If eligible, we will grant you access to the information within 30 days.

We may charge a fee to cover the costs of verifying your application, and retrieving, reviewing and copying any material requested.

4.2 Updating your personal information

We endeavour to ensure that the personal information we hold about you is accurate, complete and up-to-date. Please contact us at the details above if you believe that the information we hold about you requires correction or is out of date. We endeavour to process any request within 30 days and will provide written reasons if your request is rejected, as well as providing details for making a complaint about the refusal if necessary.

For corrections to credit information we will provide, where practicable, written notice of the correction to any entity we have disclosed this information to previously.

5. Complaints

If you are concerned that we have not complied with your legal rights or the applicable privacy laws, contact our Privacy Officer in the first instance. Please contact our Privacy Officer (contact details above) with a thorough description of your concerns and a response will be provided within a reasonable period. All complaints must be in writing.

When processing a complaint, we will require you to provide us with information to confirm your identity before processing a request related to information we may hold about you.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also contact the Office of the Australian Information Commissioner as follows:

Director of Compliance Office of the Australian
Information Commissioner
GPO Box 5218
Sydney NSW 2001

For more information on privacy see the [Australian Information Commissioner's website](#).