

## **PRIVACY POLICY**

Members of the Reece Group including Reece Australia Pty Ltd, Reece New Zealand Ltd, Viadux Pty Ltd, Actrol Parts Pty Ltd, A.C. Components Pty Ltd and the Reece Foundation will on occasions collect personal information from individuals.

The personal information that is collected will be held by members of the Reece Group.

The privacy of your personal information is afforded the highest level of importance by the Reece Group.

We are bound by the Australian Privacy Act 1988 and the New Zealand Privacy Act 2020 (the Privacy Acts) as applicable, regarding the manner in which we handle your personal information and how we respond to your requests to access and correct it. This document sets out our information handling procedures and the rights and obligations that both you and we have in relation to your personal information.

### **How we collect your information**

Subject to the exceptions set out in the relevant privacy principles we only collect information about you from the communications between you and the Reece Group.

### **Kinds of information that we hold about you**

We only hold information about you if it is relevant to providing the services and products and for the provision of information to manufacturers in the event of a recall of products (where applicable).

Such information may include your name, contact details, type of business, payment details, account number, records of correspondence and billing documents.

### **How we hold your information**

Depending on the circumstances, we may hold your information in either hardcopy or electronic form, or both.

### **How we use your information**

We use your information:

- To provide you with our products and services (where applicable) and providing details about the Reece Foundation and its objectives;
- To administer our relationship with you;
- For the provision of information to manufacturers in the event of a recall of products and to warranty service providers;
- For internal purposes such as procedural assessments, risk management, product and service reviews, staff training, accounting and billing; and
- With your consent to identify and inform you of products and services that may be of interest to you including direct marketing to you.

### **How we use or disclose your information**

We will only use or disclose your personal information for a purpose that is related to the use of your information specified above.

We will only use or disclose that information after having taken reasonable steps to ensure that the information is accurate, up to date, complete, relevant and not misleading.

Disclosure may be made to organisations that provide us with professional advice, such as solicitors, accountants and business advisors, and to contractors to whom we out-source certain functions, such as mailing houses, electronic network administrators and debt collection agencies. These parties may be in other countries, requiring the information to be disclosed to a party outside of your home country. By providing us with personal information, you agree that we may disclose that information to a party in another country. You also agree and acknowledge that the privacy laws in that other country may not be comparable to the Privacy Acts, and the law in that country may not require your personal information to be protected in a similar way as is required in your home country.

However, where possible, we take contractual measures, and in all other circumstances, take all reasonable measures, with our contractors to ensure that they comply with the privacy standards set out in the Privacy Acts. We may also disclose information where it is expressly permitted under the Privacy Acts, for example, where it is with your consent or where we are legally required to do so, such as under a court order or taxation laws.

### **How we secure your information**

We use our reasonable endeavours to hold all hardcopy and electronic records of personal information in a secure manner that meets industry standards to help protect from unauthorised access, modification or disclosure. Our staff follow strict information handling procedures and we only permit those staff whose tasks require use of your information to access it. We delete your personal information once it is no longer needed or required to be kept by law by deleting electronic records.

### **Your right to lodge a complaint**

If you are not satisfied with how we have handled your personal information, or want to make a complaint you are entitled to lodge a complaint;

- If in Australia, with the Australian Federal Privacy Commissioner. Information regarding how to lodge a complaint is available from the Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au) or by ringing the Commissioner's information line on 1300 363 992; or
- If in New Zealand, with the Office of the Privacy Commissioner, using their online complaint form.

However, before investigating a complaint, the Commissioners for both Australia and New Zealand usually require that they be satisfied that you have first expressed your concern to us to afford us an opportunity to resolve the complaint directly, unless it is inappropriate for you to do so.

You may lodge a complaint with our Privacy Officer either by mail at Reece Australia Pty Ltd Private Bag 109 Burwood Victoria, Australia 3125, or by email to [privacy.officer@reece.com.au](mailto:privacy.officer@reece.com.au).

This applies to complaints that arise both under the Australian Privacy Law and the New Zealand Privacy Law.

We will inform you of who will handle your complaint and you may contact our Privacy Officer to enquire about its stage of progress at any time. We will go to great lengths to ensure that your complaint is resolved to your satisfaction.

## **Your right of access**

You may request access to your personal information at any time by sending a written request to our Reece Australia Pty Ltd Privacy Officer by mail at Private Bag 109 Burwood, Victoria 3125, Australia or by email to [privacy.officer@reece.com.au](mailto:privacy.officer@reece.com.au).

In your request, please state how you would like to obtain access. For example, you may like to inspect our records at our premises, or you may prefer to be sent a photocopy or an electronic version of your information.

You do not need to provide a reason for your request. Once our Privacy Officer has verified your identity, your request will be forwarded to our information systems manager who will arrange for access to be provided to you in an appropriate manner within 14 days.

We may charge a small fee for providing access if it requires a significant amount of time to locate your information or to collate or present it in an appropriate form. Our Privacy Officer will follow up your request to ensure that the level of access with which you have been provided is to your satisfaction.

In rare circumstances, and only where it is permitted under the applicable Privacy Act, we may not be able to provide you with access to your information; for example, where it will have an unreasonable impact upon the privacy of others, where it relates to legal proceedings between us through which the information would not otherwise be available, where it would be prejudicial to negotiations we are holding with you, where we are required by law to withhold the information or where it would reveal information relating to our commercially sensitive decision making processes. If we are unable to provide you with access, we will state why this is so and consider whether the use of an intermediary would be appropriate to provide you with an explanation of your personal information. It may also be possible that a partial response can be provided, with any information that cannot be provided for the above reasons redacted.

We will also notify you, within 14 days, if further time will be required to comply with your request due to the size of the information, the time taken to decide on our ability to comply with your request, or the complexity of your request.

## **You may correct your information**

If your personal information is inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request we correct the information and we will consider your request.

You are entitled to provide us with a statement of the correction to the information we hold and to request that we attach the statement to the information that we hold.

## **Retention of your information**

We will retain your personal information, only for as long as the information is needed for the purposes set forth in this Privacy Policy and for any additional period that may be required or permitted by law.

## **What are your additional rights?**

In addition to the rights provided in this section, you may at any time ask us to erase, restrict or port your personal information and object to the use of your personal information. When data processing is based on your consent, you have the right to withdraw your consent at any time by sending a request to the email address [privacy.officer@reece.com.au](mailto:privacy.officer@reece.com.au).

### **Direct marketing**

Where you have consented to the Reece Group directly marketing to you about goods and services that we believe may be of interest to you, you are entitled to withdraw that consent at any time.

If so, please inform our Privacy Officer of this in writing by mail at Reece Australia Pty Ltd Private Bag 109 Burwood Vic 3125 or by email to [privacy.officer@reece.com.au](mailto:privacy.officer@reece.com.au) and we'll ensure that your name is removed from our direct marketing list.

### **Transfer of your information overseas**

We will only transfer your personal information overseas if the transfer is in accordance with the applicable Privacy Act, or as otherwise allowed for in this policy.

### **We may need to change our privacy policy from time to time**

Due to changing business circumstances, we may need to change our privacy policy from time to time. If we do, we will endeavour to ensure that you're your overall level of privacy protection is not diminished and will publish the changes on our website. Any actions that we have taken before the change will continue to be regulated by the privacy policy that existed before the changes were made.

### **Further information**

We are happy to provide you with further information regarding your privacy. If you have any queries or requests in this respect, please contact our Privacy Officer either by mail to the Reece Group Private Bag 109 Burwood Vic 3125 or by email to [privacy.officer@reece.com.au](mailto:privacy.officer@reece.com.au).