



External Privacy Policy

Henkel ANZ

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1. Definitions

In this Privacy Policy:

- **APP** means the Australian Privacy Principles set out in Schedule 1 to the Australian Privacy Act;
- **Australian Privacy Act** means the *Privacy Act 1988* (Cth);
- **IPP** means the Information Privacy Principles set out in Part 3 of the New Zealand Privacy Act;
- **New Zealand Privacy Act** means the *Privacy Act 2020* (NZ);
- **We** and **Us** means Henkel Australia Pty Ltd (ABN 82 001 302 996) and/or Henkel New Zealand Limited (Business No: 059990), whether jointly or severally.

2. Commitment to your privacy

We are committed to respecting the privacy of your personal information. This Privacy Policy sets out types of personal information and the manner in which we collect, hold, secure, protect, use and share (disclose) your personal information throughout your interactions with us.

Please carefully read the contents of this policy so that you are aware of how we handle your personal information.

3. What is personal information

The contents of this policy have been created in compliance with the following:

- The Australian Privacy Act;
- The APPs;
- The New Zealand Privacy Act;
- The IPPs.

The Australian Privacy Act defines personal information as information or an opinion:

- about an identified individual, or an individual who is reasonably identifiable;
- whether it is true or not; and
- whether the information or opinion is recorded in a material form or not.

The New Zealand Privacy Act defines personal information as information:

- about an identifiable individual; and
- includes information relating to a death that is maintained by the Registrar-General under the *Births, Deaths, Marriages, and Relationships Registration Act 1995* (NZ) or any former Act (as defined in section 2 of the *Births, Deaths, Marriages, and Relationships Registration Act 1995* (NZ)).

4. Types of personal information

We aim to provide our clients and customers (you) with the highest standard of service. As a result, we collect and hold personal information necessary for our business activities and for us to provide information, products and services that you are looking for.

Types of personal information handled by us include the following:

- Name, date of birth and gender;
- Contact details (such as telephone number, email address, residential address);
- Credit information;
- Payment details/history;
- Information about purchases including what, how and when you buy from us and how a purchase is paid for;
- Details/history of purchases, preferences, interests and behaviour relating to transactions, products, services and activities with our digital services;
- Company name, business or profession;
- Demographic information and behavioral information from social media platforms;
- Information about telephone sales enquiries, for example the time and date of the call, the geographical location of the call, the telephone number of the caller (unless withheld) and the IP address of the device the caller used to arrive at your website;
- An electronic copy of written communication or voice recordings of any conversations with us (we will always let you know when your conversations with us will be recorded);
- Internet Protocol (IP) addresses;
- Photographs;
- Social media preferences;
- Any preferences you tell us about or any other information that you provide.

5. How personal information is collected and held

Generally, we collect personal information from you throughout your interactions and transactions with us. This information may be collected and updated over the phone, over the Internet, or in person (for example when you visit us at a Henkel office). Some situations where information may be collected include, but not limited to:

- When you make a purchase in store or place an order online;
- Conducting a transaction including making a non-cash payment or registering for a service where we collect personal information;
- When you contact us or make a request for customer service;
- Posting a review or comment on one of our websites or social media pages, or posting a rating or review or other user generated content on one of our websites or apps;
- Using one of our related websites, apps, social media and other digital services;

- Participating in our marketing competitions and campaigns;
- When you enter data into the free-text-field on our website Chatbot;

Personal information may also be required or requested by us from time to time. Some situations where we may require your personal information include:

- Communicating with us through our contact forms;
- Asking for your contact details (including your address) while participating in raffles which we offer from time to time on our website;
- Your contact details while participating in product tests;
- Your contact details while participating in webinars;
- Your contact details while participating in any surveys;
- Any forms or applications to be submitted by an individual;
- A response to a request, direction, order or arrangement for sharing or transferring information between both entities;
- An entry in a visitors' book.

We may also collect personal information through third parties including, but not limited to:

- Our related companies;
- Our business partners;
- Our distributors, suppliers, service providers and contractors;
- Public sources;
- Data washing organisations and postal service providers including Australia Post.

6. Purposes for handling personal information

Personal information will only be collected or requested if the information is reasonably necessary for, or directly related to, one (1) or more of our functions or activities. Generally, we will collect, hold and use personal information about you to identify ways of serving you better, for example, being able to provide a range of products, services and benefits in accordance with your preferences. Some of the information we collect is connected to improving our interaction with you including, but not limited to:

- Managing your requests for products and services;
- Registering and servicing your account, including keeping your information up-to-date and verifying your identity;
- Communicating with you about our products, services and promotions;
- Improving our products and services, including conducting product and market research;
- Improving our operational processes so that we may enhance your customer experience;

- Improving our website experience;
- Responding to your feedback, queries or concerns;
- Working with our service providers;
- Interacting with regulators and relevant government entities.

We may also collect personal information for our internal administrations and operations including accounting, risk management, record keeping, archiving, systems development and testing, staff training, and detecting fraud.

7. How we protect, store and secure personal information

We recognise the importance of your personal information and have prepared this Privacy Policy with your security and privacy as a priority. We take reasonable steps to protect held personal information from misuse, interference, and loss, as well as unauthorised access, modification or disclosure.

We store personal information in a combination of secure computer storage facilities and paper-based files. Additionally, we ensure that personal information is only kept for as long as lawfully permitted under the APPs and the IPPs. We take all necessary steps to destroy personal information when we no longer need it. Ways we safely and permanently destroy personal information include pulping, burning, pulverising shredding and disintegrating paper-based files and sanitising hardware containing information in electronic form. We may also permanently de-identify personal information after which time the information will no longer reasonably identify an individual. Ways we de-identify personal information include grouping, combining or anonymising.

8. Use and sharing (disclosure) of personal information

We will only use or disclose personal information for the purpose for which it was originally collected from you, subject to your express consent.

There are limited circumstances in which we may disclose and share your personal information including, but not limited to:

- Where you provide consent to the disclosure;
- When you make a written request to share your personal information with a third party;
- Sharing information to related bodies of, or business units or brands within Henkel;
- Sharing information with third parties such as distributors, suppliers, service providers, contractors, partners, advisors and agents when we need their assistance in our day-to-day business operations or so we can work with them to provide a service to you;
- Fraud detection and security protection;
- Situations where we are required by law or are otherwise compelled to disclose such information in accordance with the relevant local legislation.

In such circumstances, we will not use, hold, or disclose your personal information for any purposes, other than the purpose for which it was collected, or a directly related secondary purpose, without your consent.

9. Personal information shared (disclosure) with overseas recipients

Some recipients of personal information held by us may be located overseas. We are likely to disclose your personal information, for purposes described above, to overseas recipients located in countries including, but not limited to, Australia, New Zealand, United Kingdom, United States of America, Germany, China, South Africa, Singapore, India, Philippines, Netherlands, Brazil and Japan.

We have made reasonable efforts to establish arrangements with those parties for the ongoing security and confidentiality of your personal information. We impose strict requirements on all third parties as to how they store, handle and deal with your personal information in accordance with the APPs and the IPPs and that this information will only be used by the recipients for the permitted purpose for which it is shared.

Please be advised that while we make all reasonable efforts to uphold these requirements, personal information provided to overseas recipient may not have the same protection as set out in this Privacy Policy, the APPs and the IPPs and may be exposed to risks beyond our control. We make no guarantee as to the protection of this personal information.

10. Website Cookies

When users visit our website, we automatically collect and store certain personal data that is reasonably necessary to provide you with an enhanced website experience. This is done through 'cookies', which are small text files placed on your computer's hard drive by a web server which allow the server to identify and interact more effectively with your device. Please see our online 'Cookie Policy' for more information on our use of Cookies.

11. Direct Marketing Communications

We may collect personal information so we can provide you with useful information about our products and services. We may use and disclose this information for the purpose of providing you with customised marketing communication or to conduct market research.

Typically, we may send communications to your email address or mailing address. Occasionally, we may also send marketing communications to your phone and social media platform accounts including Facebook, Twitter and LinkedIn. You may elect not to receive any commercial electronic messages by using the unsubscribe facility which is provided in these messages. Please note however, that regardless of whether you opt out of any commercial electronic messages, you will still receive information that we are required by law to provide to you.

12. Sending data over the internet

We take great care in the process of handling your personal information. However, please be advised that there are inherent privacy risks associated with transmitting information and data by way of the Internet or other electronic systems. The information and data you send by these methods may be accessed or modified by unauthorised third parties despite our procedures. You may consider another means of communication or interaction with us in order to protect your privacy. We make no guarantee to the security of your information and data while in

transit over the Internet to us and do not accept responsibility or liability for any misuse, interference, and loss, as well as unauthorised access, modification or disclosure.

13. Your rights to access and correct your personal information

We acknowledge your right to access personal information we hold about you and welcome any concerns raised by individuals about their personal information. Should you request access to your personal information, we will provide you with a copy, excerpt or summary of the information in document or record form, whether in physical format or electronic copy, unless there is a compelling reason not to.

We may consider refusing your request to access your personal information. There are limited reasons for refusal set out in the Australian Privacy Act and the New Zealand Privacy Act, and we are required to provide a written response outlining our reasons if we do intend on refusing access. Such reasons may include that a release would breach somebody else's privacy, or that the request is trivial or vexatious.

You are also permitted to do the following in accordance with the Australian Privacy Act and the New Zealand Privacy Act:

- Request for a correction of any personal information we hold about you;
- Withdraw your consent at any time where your personal data is processed with your consent;
- Delete your personal data from our records if it is no longer needed for the purposes that we have outlined in this Privacy Policy.

To exercise your rights to your personal information, you should contact us as set out below. Please note that when you make an access request, you may be required to provide verifiable proof of identity. There is no fee for submitting a request to correct or access your personal information. However, there may be a small surcharge for giving access to your personal information.

14. Complaints and concerns

We appreciate your privacy concerns and endeavour to give you the peace of mind about how your personal information is handled by us. If you believe that your personal information has been the subject of any misuse, interference, and loss or unauthorised access, modification or disclosure, please send a written complaint to the relevant Henkel Privacy Officer as soon as possible by using the contact details:

- Mr. Raj Mohan
Henkel Australia Henkel Pty Ltd
135-141 Canterbury Road
Kilsyth, Victoria
Australia 3137
Email: raj.mohan@henkel.com

We will endeavour to respond within a reasonable timeframe (usually within 30 days). If you are not satisfied with our response, please let us know and we will investigate further and respond to you.

Alternatively, you may choose to file a complaint with the relevant data protection authority as set out below, who may investigate your complaint further:

- The Office of the Australian Information Commissioner (OAIC)
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au
More details about the OAIC can be found at www.oaic.gov.au.
- The New Zealand Office of the Privacy Commissioner (OPC)
Telephone: 0800 803 909
Email: enquiries@privacy.org.nz.
More details about the OPC can be found at <https://www.privacy.org.nz/>.

15. Updates to this Privacy Policy

This Privacy Policy is current from 1st May 2021. We may review and change this policy periodically. We will ensure the most up to date version is published here. Please periodically revisit this policy to keep yourself updated on our personal information practices.

16. Contact us

If you have any queries about this Privacy Policy, or wish to pursue an action as listed above, please write to:

Raj Mohan
Henkel Australia Pty. Ltd.
135-141 Canterbury Road
Kilsyth, Victoria
Australia 3137

Henkel New Zealand Limited
2 Allens Road
East Tamaki, Auckland
New Zealand 2013

You may also contact us via telephone on 1300 856 031 (Australia) or 0508 528 637 (New Zealand) or via email on raj.mohan@henkel.com