

# Privacy Policy

## The Legrand New Zealand Privacy Policy was updated in April 2018.

Your privacy is important to Legrand. So we've developed a Privacy Policy that covers how we collect, use, disclose, transfer and store your information. Please take a moment to familiarise yourself with our privacy practices and let us know if you have any questions.

Our Privacy Policy applies to all your dealings with Legrand New Zealand Limited and its entities (Legrand) in relation to personal information we obtain about you. Legrand is bound by the Privacy Act 1993 (Act), and the twelve Privacy Principles.

Personal information is defined as any piece of information that relates to a living, identifiable human being. It may include information containing people's names, contact details, financial health, purchase records or anything that you can look at and say "this is about an identifiable person". It does not include a person's business details, unless information could be used to identify a person.

## What kinds of information do we collect and hold?

### Personal information

We only collect and hold personal information where the information is reasonably necessary for one or more of our functions or activities. Personal information collected may include:

- your name, date of birth and gender
- contact details
- user IDs and passwords
- records of communications between Legrand and yourself
- usage information
- any other information disclosed by you

### Sensitive information

Legrand only collects and holds sensitive information about you where you consent to the collection of the information and the information is reasonably necessary for one or more of our functions or activities. The kinds of sensitive information that may be collected about you include information revealing membership of a professional or trade association or union membership.

## How do we collect and hold your personal information?

Legrand will collect personal information directly from you where it is reasonable and practicable to do so. We collect and hold personal information in a variety of ways. Here are some examples of the types of personal information Legrand may collect:

- when you or your business enter into business transactions with us
- when you fill out a form, deal with us over the phone, send us a letter, send us an email
- when orders are made, when accounts are established, when purchases or refunds are made
- in connection with other services and activities we make available
- when you visit our website, when you submit your email address to our website mailing list
- when you apply for a job or make an employment-related inquiry
- when you register with us
- when you download our Apps
- from publically available sources.

Sometimes we may be required to collect information about you from a third party, such as our contractors and agents, referees or from publicly available sources.

You may visit our website anonymously, or by using a pseudonym, and can refuse to supply personal information where it is lawful and practicable to do so. However, if you do so it may prevent you from engaging in certain activities and services with Legrand.

### **Unsolicited information**

If we receive unsolicited personal information and we determine that we could not have collected the personal information from you, we will, as soon as practicable, destroy or de-identify the information. If the information is contained in a Public Register, or it's unlawful or unreasonable to destroy, it may be necessary to retain.

### **Passive information collection**

We use various technologies, such as cookies, to collect anonymous information from users of its website. This information helps us analyse website traffic and guide development of the website. Most web browsers automatically accept cookies but you can modify your browser settings to disable them. If you do so, some parts of the website may not function properly.

Our websites may contain links to other websites. We are not responsible for the practices employed by websites linked to, or from, our website. We encourage you to be aware that when you leave our website, you should read the privacy policies of all websites.

### **Automated Collection**

We may automatically collect information about the visitors to our website and to improve our website content and to help us understand how users are interacting with our website and services provided. The type of information collected may include:

- your internet browser
- your operating system
- the Internet address of your computer
- the website that linked you to our website
- the site you visit as you leave our website

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

We collect, hold, use and disclose personal information:

- for the purpose for which it was collected,
- for any purpose to which you have consented to
- for any related purpose where you would reasonably expect us to use or disclose the information

Such purposes are varied and may include:

- undertaking and completing transactions
- meeting our legal requirements
- providing customer support
- improving customer service
- developing, researching, improving, distributing and marketing our products
- performing internal administration
- maintaining business relationships

## **How do we use and disclose your personal information?**

### **Disclosure of personal information to third parties**

At times we may need to disclose personal information to third parties. The types of third parties include:

- our insurer, regulatory bodies, government agencies, law enforcement bodies, Courts or other parties we are authorised or required by law to disclose information to
- our agents, contractors and external advisors who assist us in undertaking our business functions and activities

## **Cross-border disclosure of personal information**

We may need to provide or disclose personal information to third parties operating outside of New Zealand, including Legrand's related overseas entities and other third party service providers.

The countries where these recipients may be located will vary from time to time, but may include Australia, France and European Union countries, the United States of America, and any other countries where Legrand has a presence or engages third parties.

## **Storage and processing agents**

When we provide personal information to another entity for the purposes of storage or processing of that personal information, that entity is deemed to be an agent of Legrand in accordance with the Act, and Legrand will remain ultimately responsible for ensuring that the agent complies with the relevant provisions of the Act in respect of that personal information.

Where that agent is located outside of New Zealand, Legrand is still responsible for ensuring that personal information held by the overseas entity is in compliance with the Act's key Privacy Principles, although there may be some exceptions.

## **Disclosure to overseas entities**

When we provide personal information to an overseas entity for purposes other than storage and processing, this will constitute a "disclosure" for the purposes of the Act. Legrand may only "disclose" personal information to an overseas entity in accordance with the purposes set out in this Privacy Policy and in accordance with Privacy Principles.

When we make an authorised disclosure of personal information to an overseas entity, we will no longer be responsible for that personal information. The personal information will instead be subject to the relevant information privacy laws in the jurisdiction of the overseas entity, and subsequent treatment and storage of your personal information will not be governed by the Act.

The Privacy Commissioner can prevent the transfer of personal information overseas to another jurisdiction where the Commissioner is satisfied that the relevant information privacy laws in that country do not afford the same or similar protections as New Zealand, or where the transfer of that personal information would be a breach of the basic principles of national application as set out in the OECD Guidelines.

By continuing to deal with Legrand, use our services or website, you hereby consent to the disclosure of your personal information to overseas entities in accordance with the terms of this Privacy Policy.

## **How do we market our products and services?**

From time to time, we may use or disclose your personal information to inform you about our products and services. If you do not wish to receive marketing materials from Legrand, you may opt-out at any time by contacting our Data Protection Officer via email - [dpo@legrand.com.au](mailto:dpo@legrand.com.au).

## **How do we protect your information?**

Legrand maintains appropriate security, data collection, storage and processing practices to ensure reasonable steps are taken to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. Where this information is no longer required, Legrand will take reasonable steps to destroy or de-identify the information.

## How can you access or correct your personal information?

### Accessing your personal information

Please send a written request to our Data Protection Officer via email

[privacy-officer.au@legrand.com.au](mailto:privacy-officer.au@legrand.com.au). Generally to access the personal information we hold about you. We will try to grant access to that personal information. There is no charge associated with making an access request but an administration charge may apply for providing access in accordance with your request.

We may refuse to give access to the personal information where for example giving access would disclose commercially sensitive information or information relating to existing or anticipated legal proceedings. If we refuse to provide you with access to personal information held about you by us, then we will provide written reasons for the refusal and advise you of available avenues of redress.

### Correcting your personal information

Where necessary, Legrand takes reasonable steps to ensure the personal information we collect and disclose is accurate, up-to-date, complete and relevant. If we discover the information is inaccurate, out of date, incomplete, irrelevant or misleading, Legrand will take reasonable steps to correct the personal information.

Please request any correction to your personal information by contacting our Data Protection Officer via email - [privacy-officer.au@legrand.com.au](mailto:privacy-officer.au@legrand.com.au). Legrand will try to resolve correction requests within 20 working days of your making a request. If we need more time to resolve your request we will notify you about the delay and seek your written agreement to a longer period.

If your request for correction is successful, we will provide written notice of the correction to you, and where reasonably practicable, and not prohibited by law, to certain other people we provided the pre-correction information to as required under the Act. If we refuse your request, we will provide written reasons for the refusal and provide further information about to complain about the refusal.

## How can you complain about a breach of the Act?

You can lodge a complaint free of charge by contacting our Data Protection Officer via email - [privacy-officer.au@legrand.com.au](mailto:privacy-officer.au@legrand.com.au) if you believe an act or practice Legrand has engaged in has breached the Act.

We will endeavour to contact you to confirm receipt within seven days of us having received your complaint. Legrand will try to resolve the complaint within 20 working days of receiving the complaint. If we need more time to resolve your request we will notify you as to the delay, the reasons for it and seek your written agreement to a longer period. Depending on the nature of the complaint, it may be necessary for us to consult with third parties in order to investigate and resolve your complaint

If you are unhappy with our resolution of your complaint or with the way Legrand has handled your complaint, you may be able to refer to the matter to the Office of the Privacy Commissioner. Please refer to the website [privacy.org.nz](http://privacy.org.nz) for further details.

## How do you contact us?

If you have any questions about this Privacy Policy or our handling of your information, please contact our Data Protection Officer via email - [privacy-officer.au@legrand.com.au](mailto:privacy-officer.au@legrand.com.au)

## Your acceptance of this Privacy Policy

By using our websites or entering into contracts with us, doing business or otherwise providing us with your personal information, you agree to the terms of this Privacy Policy. Depending on how you communicate with us, further privacy information may apply in addition to the matters discussed in this Privacy Policy.

From time to time Legrand may update this Privacy Policy. When changes are made, we will revise the issue date. We encourage you to check our website regularly for updates to our Privacy Policy.

In addition to our Privacy Policy, we have a Credit Reporting Policy which applies specifically to credit related personal information we gather about you. Our Credit Reporting Policy should be read in conjunction with this Privacy Policy. A copy of our Credit Reporting Policy can be obtained on our website. See [legrand.co.nz/about-us](http://legrand.co.nz/about-us) for a copy.