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Privacy Policy

Your privacy is important to Vass. 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 Vass Electrical Industries Pty Ltd and its entities carrying on business in Australia (referred to as "Vass") in relation to personal information we obtain. We are bound by the *Privacy Act 1988* (Cth) (Act), and the Australian Privacy Principles (APP).

"Personal information" is defined under the Act as 'information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.'

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 Vass and yourself
- usage information
- any other information disclosed by you.

Sensitive information

We only collect and hold 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?

Vass 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 Vass 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 publicly 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



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pseudonym, and can refuse to supply personal information where it is lawful or practicable. However, this may prevent you from engaging in certain activities and services with Vass.

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 Commonwealth record, 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 our websites. 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 the collection and use of cookies. 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.

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 Vass may be required to disclose personal information to third parties. The types of third parties we may disclose your personal information to 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 are a global company with legal entities, business processes, management structures and technical systems that cross borders. As such, we may share information about you within the organisation and may need to



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disclose such information to other countries in which we do business for the purposes outlined in this Privacy Policy. We may also be required to disclose personal information to third parties operating outside of Australia.

Our Privacy Policy and practices are designed to provide a consistent level of protection to your personal information in all countries where we do business.

Some exceptions may apply, such as where you have given your consent to the disclosure of the information or where the disclosure is required by local laws or a court or tribunal order. If you consent to the disclosure to an overseas recipient and the overseas recipient handles the personal information in breach of the Australian Privacy Principles (APP) then Vass is not accountable under the Privacy Act and you will not be able to seek redress.

Personal Data of individuals in the EU to which the GDPR applies:

The collection, use and disclosure of personal information of individuals in the EU is governed by privacy and data protection legislation of each member state including the General Data Protection Regulation (EU) 2016/679 (GDPR) for all member states of the EU.

Personal information of individuals in the EU, relating to collection, use and disclosure of that information, is subject to EU privacy and data protection legislation.

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 are in the EU and the GDPR applies, this will be subject to your express consent. If you do not wish to receive marketing materials from Vass, you may opt-out at any time by contacting our Data Protection Officer.

How do we protect your information?

We take the security of your personal information very seriously. We maintain 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, we will take reasonable steps to destroy or de-identify the information.

How can you access or correct your personal information?

Accessing your personal information

To access the personal information we hold about you, please send a written request to the Data Protection Officer: privacy-officer.au@legrand.com.au. Generally, we will try to grant access to the personal information. We may charge for giving access to the personal information.


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, we take 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, we will take reasonable steps to correct the personal information. If you find that information we hold about you is incorrect, please request its correction by contacting our Data Protection Officer: [privacy-](mailto:privacy-officer.au@legrand.com.au)



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officer.au@legrand.com.au. In your request for correction, you can ask that we notify any other APP entity of the correction if successful. If we refuse your request for correction, we will provide written reasons for the refusal and advise you of the mechanisms available to you to complain about the refusal.

How can you complain about a breach of the Act?

If you believe an action or practice Vass has engaged in has breached the Act, you can lodge a complaint by contacting our Data Protection Officer: privacy-officer.au@legrand.com.au. If you are unhappy with our resolution or with the way we handle your complaint, you may be able to refer the matter to the Office of the Australian Information Commissioner. Go to www.oaic.gov.au for further details.

How can you contact us?

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

Our Commitment to Your Privacy

To make sure your personal information is secure, we communicate our privacy and data protection guidelines to our employees.

Your acceptance of this Privacy Policy

By using our websites, entering into contracts with us, doing business with us 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 we may update this Privacy Policy. When changes are made, we will revise the date of last update. We encourage you to check our website regularly for any 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. This is reference in Part IIIA of the Act. A copy of our Credit Reporting Policy can be found at www.vass.com.au