Privacy Policy

The Vass Privacy Policy was updated in February 2026.

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 (ABN 72 000 234 060) and its related 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). In addition to the Australian laws, individuals located in the European Union or European Economic Area (**EU**) may also have rights under the *General Data Protection Regulation 2016/679* and individuals located in the United Kingdom (**UK**) may have rights under the General Data Protection Regulation (EU) 2016/679) (UK GDPR) and the Data Protection Act 2018 (DPA 2018) (together, the **GDPR**). Appendix 1 outlines the details of the additional rights of individuals located in the EU and UK as well as information on how we process the personal information of individuals located in the EU and UK.

"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 we may collect includes:

- your name, date of birth and gender
- contact details, such as your telephone number, address and email
- user IDs and passwords
- bank account and payment card details (through our third-party payment processor, who stores such information and we do not have access to that information)
- details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you
- records of communications between Vass and yourself
- technical and usage information, such details about your internet protocol (IP) address, login data, browser session and geo-location data, statistics on page views and sessions, device and network information, acquisition sources, search queries and/or browsing behaviour, access and use of our website (including through the use of Internet cookies or tracking pixels), and communications with our website
- your preferences in receiving marketing from us and our third parties and your communication preferences
- any other information disclosed by you, including when you participate in any interactive features, including surveys, contests, promotions, activities or events
- professional data, including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience, or whether you hold required authorisations or licences

Sensitive information

Sensitive information is a sub-set of personal information that is given a higher level of protection. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or

other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric 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, including from any analytics and cookie providers or marketing providers. See the “Passive information collection” section below for more detail on the use of cookies;
- 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.

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, tracking pixels and similar technologies, to collect anonymous information from users of our websites. Cookies are text files placed in your computer's browser to store your preferences. Tracking pixels are tiny, invisible images (typically the size of one pixel) embedded in web pages or emails. Cookies and tracking pixels, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website and allow third parties to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. 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. You can block tracking pixels by using ad-blocking or privacy-focused browser extensions. Some email providers allow you to block images by default, which can prevent tracking pixels in emails from loading. 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
- to enable you to access and use our Apps, including to provide you with a login
- to work with you as a customer or supplier
- meeting our legal requirements
- providing customer support
- improving customer service
- to contact and communicate with you
- developing, researching, improving, distributing and marketing our products
- performing internal administration
- for analytics, market research and business development
- maintaining business relationships
- to run promotions, competitions and/or offer additional benefits to you
- if you have applied for employment with us, to consider your employment application

Sensitive Information

We only collect, hold, use and disclose sensitive information for the following purposes:

- any purposes you consent to;
- the primary purpose for which it is collected;
- secondary purposes that are directly related to the primary purpose for which it was collected, including disclosure to the below listed third parties as reasonably necessary to work with you as a customer or supplier of our business;
- to contact emergency services, or to speak with your family, partner or support person where we reasonably believe there is a serious risk to the life, health or safety of you or another person and it is impracticable for us to obtain your consent; and

if otherwise required or authorised by law.

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 (such as bankers, auditors, our insurers and insurance brokers) who assist us in undertaking our business functions and activities
- IT service providers, data storage, web-hosting and server providers
- marketing or advertising providers
- delivery or logistics providers who deliver our goods to you
- payment systems operators or processors
- our existing or potential agents or business partners
- sponsors or promoters of any promotions or competition we run
- if we merge with, or are acquired by, another company, or sell all or a portion of our assets, your personal information may be disclosed to our advisers and any prospective purchaser's advisers and may be among the assets transferred

- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights
- third parties to collect and process data, such as analytics providers and cookies
- any other third parties as required or permitted by law, such as where we receive a subpoena

Sensitive information

We will only disclose sensitive information with your consent or where permitted by law. This means that we may disclose sensitive information to:

- our employees, contractors and/or related entities
- IT service providers, data storage, web-hosting and server providers
- professional advisors
- if we merge with, or are acquired by, another company, or sell all or a portion of our assets, your personal information may be disclosed to our advisers and any prospective purchaser's advisers and may be among the assets transferred
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights
- third parties to collect and process data, such as analytics providers and cookies
- any other third parties as required or permitted by law, such as where we receive a subpoena

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 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. We will only disclose your personal information overseas in accordance with the Australian Privacy Principles.

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 Vass, you may opt-out at any time by contacting our Data Protection Officer or opt-out using the opt-out facilities provided in the communication we send to you.

How do we protect your information?

We take the security of your personal information very seriously. To prevent unauthorized access or disclosure, we maintain appropriate security (such as physical, electronic and managerial procedures), data collection, storage and processing practices to safeguard and secure personal information and 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. While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

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. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

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-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. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. 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.

User Generated Content

We may enable you to post reviews, comments, photos and other user-generated content. Any content you choose to submit will be accessible by anyone, including third parties not associated with us. We have no control over how others may use or misuse information you make publicly available. We are not responsible for the privacy, security or accuracy of any user-generated content you choose to post or for the use or misuse of that information by any third parties.

Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Use of Artificial Intelligence (AI)

We may use artificial intelligence and machine learning technologies, including AI Technologies provided by third parties (**AI Technologies**) in our business operations and the provision of our goods and services. We will only use AI Technologies when legally permitted and necessary for our business operations.

We may use AI Technologies for the following purposes:

- to conduct analysis and processing;
- to generate and modify content and coding;
- to improve and optimise our services and operations;
- to automate certain processes and communications, such as routine tasks;
- to personalise your experience with our services;
- for quality assurance purposes; and
- to assist with customer support and queries.

Where we use service providers who provide AI Technologies to us, we will take reasonable steps to ensure that such service providers handle your personal information according to privacy law, including by ensuring that we have contracts in place requiring the service provider to protect personal information.

We will not input your personal information into any platform provided by an AI Technology service provider which then trains its model based on that information.

Your Rights and our Commitments: We will treat information generated or inferred by the AI Technologies about individuals as personal information and you maintain all rights over your personal information as outlined in this Privacy Policy, regardless of whether AI Technologies are used in processing. When using AI Technologies with your personal information:

- **Transparency and control**: we will inform you when AI Technologies are being used to make decisions that may significantly affect you. We will implement processes to verify the accuracy of AI-generated outputs and we will take reasonable steps to maintain human oversight and review of significant AI-generated decisions. Our staff are trained to understand the limitations of AI systems and verify outputs before they are relied upon; and
- **Security**: we implement appropriate technical and organisational measures to ensure that our use of AI Technologies maintains the security and integrity of your personal information. This includes regular testing and monitoring of AI outputs for accuracy and reliability; and
- **Risk mitigation**: we regularly assess and document the risks associated with our use of AI Technologies in processing personal information and implement appropriate mitigation measures. This includes ongoing monitoring of AI Technologies and regular reviews of their performance and impact.

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.

Congratulations!

You read this document all the way to the end! Now go and surf our website and buy our products with confidence.

APPENDIX 1: ADDITIONAL RIGHTS AND INFORMATION FOR INDIVIDUALS LOCATED IN THE EU OR UK

Under the GDPR individuals located in the EU and the UK have extra rights which apply to their personal information. Personal information under the GDPR is often referred to as personal data and is defined as information relating to an identified or identifiable natural person (individual). This Appendix 1 sets out the additional rights we give to individuals located in the EU and UK, as well as information on how we process the personal information of individuals located in the EU and UK. Please read the Privacy Policy above and this Appendix carefully and contact us at the details at the end of the Privacy Policy if you have any questions.

What personal information is relevant?

This Appendix applies to the personal information set out in the Privacy Policy above. This includes any Sensitive Information also listed in the Privacy Policy above which is known as 'special categories of data' under the GDPR.

Purposes and legal bases for processing

We collect and process personal information about you only where we have legal bases for doing so under applicable laws. We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please reach out to us if you need further details about the specific legal ground, we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose of use / disclosure	Type of Data	Legal Basis for processing
To enable you to access and use our Apps, including to provide you with a login.	• Identity Data • Contact Data	• Performance of a contract with you
To work with you as a customer or supplier of our business, including to dispatch and deliver our products to you.	• Identity Data • Contact Data	• Performance of a contract with you
To contact and communicate with you about our business, including in response to any support requests you lodge with us or other enquiries you make with us.	• Identity Data • Contact Data	• Performance of a contract with you
To contact and communicate with you about any enquiries you make with us via our website.	• Identity Data • Contact Data	• Legitimate interests: to ensure we provide the best client experience we can offer by answering all of your questions
For internal record keeping, administrative, invoicing and billing purposes.	• Identity Data • Contact Data • Financial Data • Transaction Data	• Performance of a contract with you • To comply with a legal obligation • Legitimate interests: to recover debts due to us and

		ensure we can notify you about changes to our terms of business and any other administrative points
For analytics, market research and business development, including to operate and improve our business, associated applications and associated social media platforms.	• Technical and Usage Data	• Legitimate interests: to keep our website updated and relevant, to develop our business, improve our business and to inform our marketing strategy
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	• Identity Data • Contact Data • Technical and Usage Data • Marketing and Communications Data	• Legitimate interests: to develop and grow our business
To run promotions, competitions and/or offer additional benefits to you.	• Identity Data • Contact Data • Interaction Data • Marketing and Communications Data	• Legitimate interests: to facilitate engagement with our business and grow our business
If you have applied for employment with us, to consider your employment application.	• Identity Data • Contact Data • Professional Data	• Legitimate interests: to consider your employment application
To comply with our legal obligations or if otherwise required or authorised by law.		• To comply with a legal obligation

If you have consented to our use of data about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your data because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer doing business with us. Further information about your rights is available below.

Data Transfers

The privacy protections available in the countries to which we send data for the purposes listed above may be less comprehensive than what is offered in the country in which you initially provided the information. Where we transfer your personal information outside of the country where you are based, we will perform those transfers using appropriate safeguards in accordance with the requirements of applicable data protection laws and we will protect the transferred personal information in accordance with this Privacy Policy and Appendix 1. This includes:

- only transferring your personal information to countries that have been deemed by applicable data protection laws to provide an adequate level of protection for personal information; or

- including standard contractual clauses in our agreements with third parties that are overseas.

Data retention

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Extra rights for EU and UK individuals

You may request details of the personal information that we hold about you and how we are process it (commonly known as a "data subject request"). You may also have a right in accordance with applicable data protection law to have your personal information rectified or deleted, to restrict our processing of that information, to object to decisions being made based on automated processing where the decision will produce a legal effect or a similarly significant effect on you, to stop unauthorised transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to you or another organisation.

If you are not happy with how we are processing your personal information, you have the right to make a complaint at any time to the relevant Data Protection Authority based on where you live. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Authority, so please contact us in the first instance using the details set out above in our Privacy Policy above.