

## **J. A. Russell Limited - Privacy Policy**

J. A. Russell Limited ("JA Russell") is committed to protecting the privacy of the personal information of individuals we deal with.

### **The information we collect**

We collect information relating to you that you provide to us (or to service providers or partners working on our behalf) by many different means. For example you may provide us with personal information by filling in an application form, entering information into, or otherwise interacting with, our website, apps, branch Wi-Fi service or other online platforms or services or through the way you transact with us. The information we collect may include:

- your name, address, telephone number, email address and job title;
- demographic information, such as your age, gender and interests;
- credit related information such as payment information and credit history;
- security information, such as passwords and usernames for the on2Site portal section of this website;
- information about what goods you purchase, how much you spend with JA Russell and the branches that you purchase from; and
- on-line interaction information, such as how often you use our website, branch Wi-Fi service, apps or other on line platforms or services, what pages on our website were visited or service components used and (in connection with our branch Wi Fi service only) the location at which you connected to the service and how much data was used.

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

The information we collect from you may be used by us for JA Russell business related purposes including:

- to communicate with you about your account and our relationship with you;
- processing your orders and supplying you with goods;
- administering your account, including dealing with your enquires, credit checks, billing and debt collection;
- improving our range of products, services and promotions (including assessing trends and customer interests);
- business, product, market and service analysis;
- business marketing, including contacting you about our products and services (unless you ask us in writing not to do so);
- ensuring compliance with any applicable trading or other terms and conditions;
- competitions, promotions and operating any loyalty or reward programme that you are involved in; and
- any other JA Russell business related purpose for which the information was disclosed to us.

### **Protecting your personal information**

We will take reasonable steps to ensure the personal information we hold is stored in a secure environment and protected from unauthorised access, use, modification or disclosure. If you suspect any unauthorised access, use, modification or disclosure of your personal information held by JA Russell, please let us know immediately.

If you have login access to the secure on2Site portal section of this website, your account information is username and password protected. We recommend that you do not share your username and password with anyone.

### **Sharing of information**

We may share your personal information with our service providers for the purposes set out under 'How we use your personal information' above. We will require any such service provider to use reasonable efforts to protect your personal information against unauthorised access, use, modification or disclosure.

We may share your personal information with a supplier or manufacturer of products we sell where reasonably required:

- to enable them or us to respond to questions or concerns you have raised in connection with that supplier or manufacturer or their products; or
- to enable them to contact you directly in the event of a product recall or similar issue.

We may share anonymised and/or aggregated information about our customers with selected suppliers, manufacturers, service providers and other partners.

We may disclose personal information about you (i) if we are required to do so by law, regulation or legal process, (ii) when we, in good faith, believe disclosure is necessary to prevent physical, financial or other harm, injury or loss, (iii) in connection with any investigation of suspected unlawful activity or (iv) to assist in collecting debt owed by you.

We will not sell, trade or rent your personal information to third parties without first obtaining your consent. However, we do reserve the right to transfer personal information we have about you to a third party in the event we sell or transfer our business or assets (or a substantial proportion) to that third party. If this was to occur, we will use reasonable efforts to require that third party to use the personal information you have provided to us in a manner that is consistent with this privacy policy.

### **Information gathered from our website, apps, branch Wi-Fi service or other online platforms or services**

When you browse, read or download information from, or otherwise interact with, the JA Russell website any JA Russell apps or other JA Russell on-line platforms or services, our system (using browser cookies or other technology) may log these movements and collect this information.

When you use our branch Wi Fi service, our system may record the location at which you accessed the service and the amount of data you used.

### **Links**

JA Russell cannot provide any assurances or take any responsibility for the privacy practices of websites to which we provide links.

### **Accessing your personal information**

You may ask to see any personal information we hold about you and we will provide it so long as we have such information and can readily retrieve it, subject to some exceptions at law. You may also ask us to correct any incorrect personal information we hold about you. In some cases there may be a charge associated with providing you with copies of your personal information and we will advise you of these charges before providing you with the information.

Please contact JA Russell in writing if you would like to know more about how you can access or update your personal information:

J. A. Russell Ltd  
Private Bag 92641  
Symonds St  
Auckland 1150

Attn: Information Systems Manager

### **Changes**

We may change this privacy policy from time to time. Changes will be effective immediately upon posting of the updated version of this privacy policy on this website. This privacy policy was last updated in July 2016.