

# Pental Limited's Privacy Policy

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## INTRODUCTION

Pental Limited (**Pental**) is dedicated to delivering quality, expertise and value in everything we make. Ours are trusted and loved brands that have been part of Australians' lives for generations. We understand that you care about how your Personal Information is collected, used and shared and we want you to be able to make an informed choice as to the information you provide to us or that we may collect from you when you interact with us. As part of our commitment to Australian families we respect your privacy and Personal Information.

This Privacy Policy applies when Pental collects data from consumers and guests to its , websites or applications, which includes Pental controlled applications accessed and/or used on a mobile, handheld or other wirelessly connected devices (a **Website** or **Application**). Any Personal Information you provide is voluntary. **Personal Information** includes information such as your name, address, telephone number, email address and location, that alone or in combination with other information, may be used to readily identify, contact, or locate you.

By disclosing your Personal Information to us or using our Websites or Applications, you consent to the collection, use and distribution by Pental of your Personal Information in accordance with this Privacy Policy (which is expressly incorporated into any applicable Website or Application terms of use) and applicable data protection and other relevant laws.

We will update this Privacy Policy from time to time. Accordingly, please check this Privacy Policy periodically, as your continued use of our Websites or Applications means you acknowledge, agree to and consent to those changes.

## WHY WE COLLECT YOUR INFORMATION AND HOW WE USE YOUR INFORMATION

Pental collects and uses your Personal Information for the following reasons:

- provide you with information about our products and any services;
- respond to requests made for information about our products and services;
- respond to feedback, complaints or comments whether made by phone, electronic means, mail, or in person;
- supply products and services to you;
- purchase goods and services from you;
- manage warranties and guarantees;
- provide after sale consumer support;
- undertake marketing and promotional activities;
- analyse the impact of our advertisements, competitions and promotions;
- meet our internal reporting requirements;
- process employment applications;
- engage contractors;
- provide you with important information relating to a change to our terms and conditions, our Website or an Application;
- conduct market research and product development;

- improve our Website and its functionality;
- identify if you have previously visited the Website and help you auto-populate your information so you don't have to re-type it;
- advise you of a security breach;
- direct marketing to inform you of special offers and promotions which may be of interest to you;
- meet our legal and regulatory responsibilities;
- product recalls;
- provide location based functionality in our Website and Application utilising your Location Data for your benefit (for example, locate your closest retailer of our products);
- contact you by email, SMS or MMS, phone or mail or in any other lawful manner for the purposes set out above.

Pental only collects information it considers necessary for the activities of its business. Most of the information collected is obtained directly from you so you will normally be aware of the purpose of its collection. Pental only uses and discloses your Personal Information for the purposes for which it was originally collected, unless required or authorised by or under law, or if you have consented to the intended use.

## **HOW WE COLLECT YOUR INFORMATION**

Pental collects your Personal Information in a number of ways.

For example, we collect information when you:

- use our Website or an Application to make an enquiry about our products and services;
- Ask our Martha Advice Corner a question;
- when you request we send you information on our products;
- when you enter a competition or fill in a competition form;
- post a comment on our Website or an Application;
- use our Website or an Application and this information is captured by Google Analytics;
- enter into written agreements with us, our agents or third party service providers;
- send us an email or letter or make a telephone enquiry or complaint;
- purchase a product directly from us;
- when you submit an employment application and through the employment process;
- ask to be included on a mailing list; or
- provide your information to a third party that provides services to us or we supply services to, such as a contractor, agent, our related body corporates or regulatory authorities.

## **TYPES OF INFORMATION WE COLLECT**

We collect the following types of information:

- Name, email address, telephone and fax numbers and delivery details;
- Age;
- Date of birth;
- Gender;
- Occupation;
- ABN, if you are a contractor or supplier of goods;
- IP Address;

- credit card details;
- Location Data;
- Device type (iPhone, laptop etc);
- domain name;
- Web browser, Safari, Firefox;
- Date and time of access to the Website or Application and which website you came from;
- Content of emails;
- hyperlinks you have clicked;
- information you post on our Website or your webpage;
- any other information you voluntarily provide to us.

## **DIRECT MARKETING**

Provision of your Personal Information to us such as an address, email address and/or phone number, means you are consenting to receive direct marketing material from Pental our related bodies corporate and third party service providers by way of phone calls, mail, email, SMS text messages, mobile message services (MMS) or instant messaging.

Your Personal Information is disclosed to third parties for the purpose of allowing them to direct market our products and services to you in the ways described above. We have disclosed the types of third parties that may contact you with direct marketing in the section below headed DISCLOSURE TO THIRD PARTIES AND OTHER USES.

You may opt out of receiving any direct marketing by:

- unsubscribing from the emails, by clicking on the link within the email;
- sending an email to: [enquiries@pental.com.au](mailto:enquiries@pental.com.au),
- by phone on 03 9251 2311; or
- by mail to: Marketing,  
Pental Limited,  
Level 6, 390 St. Kilda Road  
Melbourne, VIC, 3004

## **CONSUMER'S SENSITIVE PERSONAL INFORMATION**

Sensitive Personal Information includes information relating to race, religious beliefs, trade or professional associations, sexual orientation or health information etc. Pental does not usually require consumers to provide Sensitive Personal Information.

Occasionally, a consumer may advise us of Sensitive Personal Information but we do not actively seek this information. If you do disclose your Sensitive Personal Information to us, you consent to our collecting, using and disclosing this Sensitive Personal Information for the purpose for which you disclosed it to us and as permitted under the Privacy Act and other relevant laws.

## **PENTAL'S CONTRACTORS**

If Pental engages you as a contractor we may collect information relating to your engagement. The information that may be collected will be in relation to your qualifications, training records and logs, references, length of engagement, resume, pay rate, salary, bank account details and ABN. If you do disclose your Sensitive Personal Information to us you consent to our collecting, using and disclosing this Sensitive Personal Information for the purpose for which you disclosed it to us and as permitted under the Privacy Act and other relevant laws.

## **EMPLOYMENT APPLICATIONS**

Personal Information you provide in your employment application will be used to assess your application. You consent to us disclosing your Personal Information to third party service providers who may assist with the assessment of your application. This assessment may include screening, aptitude tests, human resources management purposes such as background checks and discussing your application with referees, medical tests and health assessments.

The application process may require us to collect Sensitive Personal Information which will be provided directly and voluntarily by you. The Sensitive Personal Information that may be collected during the employment process includes: tax file numbers, race, religion, professional or trade association memberships, health or criminal records.

We may request you have a medical assessment and/or complete a health questionnaire as part of the employment process. If this occurs, you consent to us disclosing your Sensitive Personal Information and Personal Information to a third party service provider who will complete the health/medical assessment on you. If you do not give your consent to these disclosures we will be unable to consider your application for employment any further.

Pental does not collect and/or process any Personal Information or Sensitive Personal Information against the express wishes of an individual, unless Pental is required by law to do so.

## **DISCLOSURE TO THIRD PARTIES AND OTHER USES**

Pental does not use or disclose any Personal Information to third parties without your consent and as disclosed in this Privacy Policy or unless required by law. We only work with third parties that demonstrate the same level of commitment to your privacy as Pental does, and who comply with the Australian privacy laws.

Pental does occasionally grant access to your Personal Information to third party service providers under conditions of confidentiality. Our third party service providers are only permitted to use your Personal Information for the purpose for which we supply the information. We may disclose your information to the following types of third parties in the course of providing a product or service to you:

- related bodies corporate of Pental;
- Pental partners or their respective related bodies corporate;
- employees and contractors;
- web hosting, data housing providers and other IT suppliers;
- third party websites or applications where an interface or hyperlink has been allowed and that information is required to permit a connection to be made to the third party website or application;
- when we provide location based services enabled through a third party, we may share data with those services in order to provide the related location based service or functionality;
- web analytics such as Google or Unica;
- insurers, lawyers, financiers and other professional advisers;
- service providers engaged by Pental to provide a particular service on our behalf such as:
  - advertising, marketing, promotional and printing organisation who produce our marketing and promotional material;
  - mailing houses, postal and delivery services;

- agencies that deal with product recalls and send information to affected consumers; and
- marketing and research agencies who conduct and analyse our marketing, promotions or competitions and undertake market research and trend analysis;
- entities that process credit card payments;
- Tax Office.
- a Court or to a third party under a subpoena issued by a Court;
- a regulatory authority;
- law enforcement purposes.

Pental may disclose Personal Information without the consent of the individual, where the law requires us to make the disclosure. The types of bodies to whom such a disclosure may be required to be made are:

- Tax Office;
- a Court or to a third party under a subpoena issued by a Court;
- a regulatory authority.

Pental may use a their Facebook page to run promotions and this may result in the collection of your Personal Information occurring directly by the service provider on their website. The promotion will state the policies governing the collection of such information if they should differ from this Privacy Policy.

Products purchased directly from our Shepparton Factory may result in you being asked for information to complete your purchase. The information you provide is used, to process your transaction or to provide related customer service. Part of your purchase transaction may be conducted through third party vendors and suppliers, such as EFTPOS through a financial institution.

Our authorized service providers may occasionally have access to aggregate statistics about our consumers, sales, traffic patterns, and related Website or Application information. Transfers of aggregate statistics do not involve Personal Information.

Please be aware that when you continue to purchase Pental products or services, Websites and Applications, you are consenting to such disclosures to third parties.

## **OVERSEAS TRANSFER OF INFORMATION**

We may disclose Personal Information to third party service providers who are located outside Australia.

The countries we may send your information to include: New Zealand and the USA.

Unless an exception applies under the Privacy Act, we take all reasonable steps to ensure third party recipients of your Personal Information located overseas do not breach the privacy principles of the Privacy Act.

## **ANONYMITY AND PSEUDONYMS**

You may deal with us anonymously or by using a pseudonym, unless to do so would be considered unlawful or impracticable. Please advise if you wish to deal with us anonymously or by a pseudonym.

## **COOKIES AND COLLECTION OF NON-PERSONAL INFORMATION**

We use cookies, web beacons, pixel tags, website Analytics such as Google analytics and other similar technologies in connection with our Website and Applications. These technologies allow us to collect non-personal information about you when you visit our Website or an Application. This information allows us to develop our products and services, provide information and services to our Website and Application visitors and for general marketing and advertising purposes.

Most internet browsers are set up to accept cookies. You can set your browser to notify you when you receive a cookie or to block a cookie. If you block our cookie you may not be able to take full advantage of the services available as it may interfere with or make some functionality on our Website or Application unavailable.

## **OPTING OUT**

If you wish to stop receiving communications from Pental at any time, please let us know by contacting us in one of the following ways:

Email: enquiries@pental.com.au]  
By mail: Addressed to: Marketing  
Pental Limited  
Level 6, 390 St. Kilda Road  
Melbourne, VIC, 3004

## **MERGERS, ACQUISITIONS AND INSOLVENCY**

If Pental merges with another entity or agrees to sell its business whether in whole or part or becomes insolvent, then its Personal Information and Sensitive Personal Information data may be transferred to a prospective purchaser, an actual purchaser, an entity a party to the merger or released to a liquidator. This data will remain subject to privacy laws and until you are further notified, will remain subject to Pental's Privacy Policy.

## **ACCURACY OF INFORMATION**

Pental takes all reasonable steps to ensure the Personal Information it holds is accurate, up to date, complete, relevant and is not misleading. To enable us to do this, we may contact you from time to time to request you advise us of any changes to your Personal Information. If you believe any of your Personal Information held by us is incorrect, please contact us immediately by:

Email: enquiries@pental.com.au  
By mail: Addressed to: Pental Limited  
Level 6, 390 St. Kilda Road  
Melbourne, VIC, 3004

If we refuse to correct your information after receiving your request, you may request we associate the information with a statement that the information is incorrect, out of date, incomplete, irrelevant or misleading. Any refusal to correct your information will come with reasons for the refusal and the mechanisms available to you to complain about the refusal.

## **SECURITY OF INFORMATION**

Pental takes all reasonable steps to ensure that Personal Information is kept safe from misuse, interference, loss and unauthorised access, modification and disclosure. The electronic database that holds the information is designed to restrict access to unauthorised

persons. The internet is not secure and Personal Information you send to us via the internet is done so at your own risk.

If Pental learns of a security breach, in relation to your Personal Information we may attempt to notify you so you can take appropriate protective steps. You consent to Pental contacting you in these circumstances.

Pental takes all reasonable steps to destroy or permanently de-identify Personal Information that is no longer needed for a permitted purpose and is not required to be retained by law.

## **ACCESS TO YOUR PERSONAL INFORMATION AND COMPLAINTS**

If you wish to access the information Pental holds about you, or you have any questions, concerns or complaints, please contact us in writing to discuss at.

Email: enquiries@pental.com.au  
Mail: Addressed to: Customer Service  
Pental Limited  
Level 6, 390 St. Kilda Road  
Melbourne, VIC, 3004

We may charge you a fee for accessing your Personal Information. This fee will reflect our reasonable costs of retrieving and supplying the information to you.

We may refuse to give you access to your information and if we do so, we will give written reasons for the refusal and the mechanisms available to complain about the refusal. We can refuse access where the information relates to anticipated legal proceedings, the request is frivolous or vexatious or giving access would have an unreasonable impact on the privacy of other individuals.

## **PUBLIC AREAS**

Any information disclosed in public areas of a Pental Website or Application or other website (Facebook, YouTube, Twitter, etc.) will become public information. Pental has no control over the use of information disclosed in public forums, such as social media forums, platforms, bulletin boards, blogs, wikis, chat rooms, and networking functions of mobile-device applications. Please exercise caution when disclosing your information in these public areas, You are solely responsible for any content you post in public areas of our Websites or Applications. We do not necessarily endorse, support, verify, or agree with any content posted and we reserve the right to remove any comments we consider to be offensive, derogatory or otherwise inappropriate.

## **CHILDREN**

Our Website and Applications are not directed at children. If you are under 18 or otherwise require a parent or guardian to consent to the disclosure of your information, you should not send any Personal Information about yourself to us. If we receive Personal Information from a person under 18 and we become aware of it we will attempt to delete this information as soon as possible. Pental does not knowingly collect any Personal Information from persons under 18 and does not knowingly pass this information onto third parties.