



## T&G Global Limited Privacy Statement

### Last Updated 18 November 2021

#### Introduction

At T&G we take your privacy seriously. The purpose of this Privacy Statement is to inform you about our collection, use and disclosure of any personal information that we may hold about you, including how we ensure the accuracy, integrity and security of such information. This statement should be read in conjunction with the agreement under which you engaged with us, the terms and conditions provided we have provided or given you access to, and the T&G Code of Ethics available on our website.

**T&G** refers to T&G Global Limited (the Company) and its majority-owned or controlled subsidiaries. For more information see our [About Us](#) page.

**Personal information** means any information about an identifiable individual. Common examples include your name and address, email, and date of birth.

Within this Privacy Statement we explain how we manage your personal information when you interact with us by:

- using our products and services
- using our digital platforms (“**Digital Platforms**”) which include our websites and apps and the various ways we interact with you online
- applying for employment or to contract with us
- responding to competitions, surveys or promotions
- visiting our physical sites
- interacting or communicating with us in any other way e.g. phone, email, online media

T&G manages the personal information it holds about you in accordance with obligations under relevant laws and regulations, including the New Zealand Privacy Act 2020.

Where applicable, we will also comply with data protection laws of other jurisdictions, such as the European General Data Protection Regulation (GDPR).

This Privacy Statement may be updated periodically. The latest version and publication date will always be clearly marked.

## Collecting Personal Information

We will only collect personal information for a lawful purpose, in ways that are fair and not unreasonably intrusive and only if the personal information is necessary for that purpose.

You may choose not to give us your personal information. However, if you don't we may not be able to give you (or continue to provide) full access to the products and services you requested or let you access some or all of our Digital Platforms.

If you do not want us to collect or use your personal information as outlined in this Privacy Statement, please contact our [customer service team](#) to discuss how we might assist.

### How and when we might collect personal information

We collect personal information in different ways, but most of this personal information we collect directly from you and with your consent, which will usually be obtained at or around the time you contact us or purchase a product or service from us. For example, when you:

- open a vendor or customer account
- apply for employment with us
- visit any of our locations, or talk to us face to face
- phone us or our customer service team- — we may monitor or record your calls for quality control and/or staff training purposes. We will let you know when we do, at the time of the call
- write to us — for example, by letter, email, SMS, follow or participate in our social media
- request, get or use our products or services, or products and services you get through us
- complete one of our forms — such as a customer registration, credit application, competition or survey form
- use our Digital Platforms e.g. websites or apps
- subscribe to any update services we currently or may provide in the future
- participate in our promotions and competitions.

We may also collect personal information about how you use third-party websites containing our content. You can learn more about how we collect this information in [Digital Platforms, Cookies and Analytics](#).

With your consent, we may also receive your personal information from other parties who can legally share your personal information with us.

We may also obtain your personal information from public sources like newspapers, public registers (e.g. New Zealand Companies Register), websites and open sources of social media.

We may use camera surveillance at any number of our locations. Unless otherwise specified audio recordings are not made as part of the footage. Appropriate signage is available in areas where camera surveillance is in operation. Covert use of camera surveillance systems may be considered only in circumstances where the law permits it.

### What personal information might we collect?

Personal information we collect may include items, such as:

- your name
- address
- date of birth
- email address
- telephone number
- IRD number
- your image (only via CCTV where operating)
- employment status
- credit history or other financial details.

We may utilise automatic data collection technology solutions such as browser cookies to collect information about how our systems are being used. For more information refer to the [Digital Platforms, Cookies and Analytics](#) section.

## Security

### How do we secure your personal information?

We ensure there are reasonable security safeguards in place to prevent loss, misuse or disclosure of personal information.

Personal information may only be accessed by T&G employees, contractors, professional advisors and other service providers on a need-to-know basis, for the purpose(s) for which the personal information has been collected and only in support of legitimate purposes.

We will use all reasonable endeavours when selecting and engaging third parties to whom we will disclose your personal information and will hold them accountable to the same data protection and privacy standards we meet ourselves.

We also take all reasonable precautions to protect your personal information by:

- regularly assessing the risk of misuse, interference, loss and unauthorised access to personal information we hold from both internal and external threats
- taking action to address any identified risks such as the use of dedicated secure networks or encryption when we send personal information electronically or the implementation of physical security measures to our locations
- conducting regular reviews and audits to assess the quality of the actions we have implemented.

## Access and Correction of your Personal Information

### How do I access my personal information?

You have the right to ask us whether we hold any personal information relating to you and request access to any of your personal information that we may hold.

We will make all reasonable attempts to provide the personal information in the format requested by you or failing which will offer it in a format that we feel should be acceptable. To make a request please [contact us](#).

### How can I correct my personal information?

Before using or disclosing personal information, we take reasonable steps to ensure it is accurate, complete, relevant, up to date and not misleading.

If you believe we hold incorrect personal information you can ask us to correct this by providing the details you believe are incorrect and any new information you would like recorded in its place. Please [contact us](#) if you would like to request a correction.

## Use, Disclosure and Retention of your Personal Information

### How may my personal information be used?

We may use your personal information to:

- enable us to provide the products and services you have requested
- consider hiring you
- improve our website and services
- respond to communications from you, including enquiries and complaints
- conduct research and statistical analysis
- for any other lawful purpose authorised by you or allowed by any applicable law

We may be legally or otherwise required to contact you with service messages which we need to send you.

If you wish to stop or change the channel in which we contact you, please contact [us](#).

### Who might your personal information be disclosed to?

Depending on the product or service we provide to you, we may, with your consent, disclose your personal information to other parties including the following:

- other product and service providers so you can be provided with the product or service you seek or have expressed interest in
- a person acting on your behalf, including an adviser or similar
- credit reporting agencies as required to provide you with products and services
- members of the T&G Global Group (including those outside New Zealand) and their associated entities; and
- if you have been referred to us, the person who made the referral.

Your personal information may be transferred to other companies within T&G's group of companies, or other third parties that help us deliver our services to you. These companies might be in other countries and may be subject to different laws.

We will not share your personal information with third parties unless one of the following conditions or reasons apply:

- you have provided your consent. We will ask for your consent before sharing any of your personal information. You are entitled to withdraw your consent at any time.
- for legal purposes. We may transfer your personal information to Government authorities as required or allowed to by applicable law or regulation.
- further disclosures: We reserve the right to disclose any personal information if we reasonably believe that such action is necessary to protect or defend the legal rights or property of T&G, our Sites or Apps and the users of them; or in an emergency to protect the health and safety of our Site's or App's users or the general public.

### How long is personal information retained?

We may only retain any of your personal information for as long as is necessary in line with a legitimate business purpose. If you believe we no longer have the right to retain your personal information, please [contact us](#) and we will assess your request.

## Digital Platforms, Cookies and Analytics

Our Digital Platforms may contain links to other websites that are not controlled or maintained by T&G. We are not responsible for the privacy practices employed by these other websites.

In addition, our Digital Platforms may link to websites owned or operated by subsidiaries or companies affiliated with T&G ("**Affiliated Sites**"). Please note that the Affiliated Sites may also be subject to the terms of use and policies posted on those sites.

The collection of personal information may be facilitated by our Digital Platforms directly or by using external third-party services including Google Universal Analytics.

Our Digital Platforms and underlying infrastructure recognise and record certain information about visitors and users. The nature of the information collected may include the type of browser used, the type of operating system of your computer or other Internet access device, the domain name or Internet Protocol ("**IP**") address of the visitor's / user's Internet service provider, the Digital Platform pages visited by users, the actions taken on said pages, and the character and duration of Digital Platform usage. In addition, our Apps will recognise and record all data that you input into it.

Social media features may be hosted by a third party or by us on our Digital Platforms. If you use the social media features, you rely on the privacy policies of the social media providers, as far as the law allows. We are not responsible for the actions of any social media providers.

We may provide an application programming interface (API) to enable third-party applications to interface with our Digital Platforms. This may include authenticating to a third-party system using T&G credentials.

### How are cookies used?

In addition to the information described above, we may also send you “cookies.” Cookies are small text files from a website that are stored on your hard drive. These small text files make using a website or App more convenient by saving your passwords and preferences for you.

Cookies and identifying information are an important way we interact with your internet browser. We use them to:

- give you better and more customised services
- improve our website and advertise more effectively

Cookies may contain personal information. We may analyse the information derived from these cookies and match such information with data provided by you or another party.

We may provide our analysis and certain non-personal information to potential partners, advertisers (who may use this information to provide advertisements or other information tailored to your interests) or other third parties, but we will not disclose any personal information, except as provided in this Privacy Statement.

You have the option of deciding whether or not to accept a cookie by resetting your browser to notify you whenever a cookie is being sent to your hard drive. You may also delete a cookie manually from your hard drive. Please note, however, that some parts of our Digital Platforms may not function properly or may be considerably slower if you refuse to accept a cookie or choose to disable your cookies settings

We will tell you about changes to our Digital Platforms, including updating our apps.

By using our Digital Platforms, you agree we may collect and use personal information about:

- you
- your activity on our Digital Platforms
- your device — including the type and model of your device, browser, app and operating system
- your IP address
- the security information and the identifying information of your device
- the information gathered through cookies and other digital tracking tools
- similar or other personal information relating to the above.

For example, we may use the personal information to tell you about other accounts, products or services that we or third parties offer. We may use the personal information to understand what might be relevant to you and tailor our online information for you.

We may receive location data based on your location which we can only collect if you allow it. For example, if you enable location on your mobile device. That data may come from GPS, Bluetooth or Wi-Fi signals.

We may also infer your approximate location from your IP address so we can present more relevant information and advertising to you.

### What analytics is occurring?

We may use analytics to monitor performance and improve user experience on our digital platforms.

Analytics is about understanding how our Digital Platforms are used, including when, how and by which type of customer. We may use third-party software and services to measure the performance of our platforms and third-party websites that have T&G content.

We may use this information for various reasons. For example, to:

- analyse collective user behaviour — from user statistics such as the number of page views, number of unique visitors, time spent on the platform, time of visits and types of devices used. We use this information for the purposes explained in our Privacy Statement
- monitor how our Digital Platforms perform, identify issues and proactively improve your customer experience — application performance monitoring (APM) technology tells us how our platforms work on different browsers.

If you log on to secure areas, we can combine your identifying information with your other information (including personal information), for the purposes explained in our Privacy Statement.

We may use third party software and services, to measure the performance of our digital platforms, and third websites that may have T&G content.

For example, they may use cookies, web beacons and similar technology to collect information on:

- what you clicked to access information
- your type of browser
- the time and date of your visit
- the types of advertisements you click on or scroll over
- your location
- your device identification.

Let's say you visit our website after seeing an ad on a third-party website. The advertising and tracking company may collect information such as which pages you view on our site or whether you complete an online application.

We can report and analyse information that advertising and tracking companies collect. We can examine advertising effectiveness, optimise our advertising and show you more relevant advertising.

### How to contact the T&G Privacy Officer

If you have questions or comments about our Privacy Statement, or if you wish to review, amend or delete any personal information you have provided to us or if you wish to modify the permission you have given us regarding use of your personal information, you can [contact us](#).