

PRIVACY POLICY

INTRODUCTION

NZPM Co-operative Limited and its related companies listed below (NZPM) has this privacy policy because we understand that it is important for you to know how we collect, store and use your personal information.

NZPM means the following companies and any of their associated brands:

- NZPM Co-operative Limited
- Plumbing World Limited
- Metrix Imports Limited

In this policy we refer to NZPM as “we”, “us”, “our” or “Group”.

By entering any of our branches, using our website, trade website, apps, store Wi-Fi or services, participating in our database or promotions or interacting with our business, you acknowledge that your personal information will be treated as described in this policy.

This policy explains the following:

1. Personal information
2. Types of personal information we collect
3. Collection of personal information
4. If we are not able to collect personal information
5. Use of personal information
6. Cookies
7. Use of personal information for marketing
8. Mobile
9. Disclosure of personal information
10. Disclosure of personal information outside of New Zealand
11. Protection of personal information
12. Right to access or correct your personal information
13. Employees and applicants
14. Complaints about a breach of privacy
15. Changes to the privacy policy

1. PERSONAL INFORMATION

In this policy, “personal information” means the same as it does in the Privacy Act 2020 (“Privacy Act”). In general terms, this includes any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, address, contact details (including phone numbers and email addresses) images of you, your financial information, including your payment information. If the information we collect personally identifies you, or you are reasonably identifiable from it, and that information is not freely

available from a public source, then the information is considered personal information.

2. TYPES OF PERSONAL INFORMATION WE COLLECT

We may collect the following types of personal information:

- Name
- Mailing or street address
- Location
- Email address
- Telephone number
- Age or birth date
- Profession, occupation or job title
- Proof of identification including passport and driver's license
- Details of the products you have purchased from us (including payment information) or which you have enquired about or showed interest in, together with any additional information necessary to deliver those products and to respond to your enquiries
- Any additional personal information that you provide to us directly or indirectly through our websites, apps or in-store or through our representatives, through use of our services or otherwise
- Information you provide to us through our sales network or customer surveys, or that is publicly available
- Information required for NZPM to comply with applicable laws and regulations; and

For employees we will only collect information for valid work purposes or where directed to by law.

3. COLLECTION OF PERSONAL INFORMATION

We do this in a variety of ways, including when you:

- Purchase products or services from us
- Access and use our websites, apps and communications, including registration details and information relating to your use of the website and the services, such as the content you access (for example, the products you have viewed, or the search queries you input)
- Interact with us through live chat on our websites
- Enter our branches
- Access and use our Wi-Fi in-store
- Interact with us through any of our loyalty and shareholder programmes
- Call, email or interact with our sales and customer service representatives

- Complete an application for a product or service
- Enter promotions that we run or facilitate
- Interact with us on social media

You agree that we may also collect personal information from third parties, including:

- Third party companies such as credit reporting agencies, other retailers (for the purpose of preventing criminal behaviour), law enforcement agencies, and other government entities
- Contractors and business partners

4. IF WE ARE NOT ABLE TO COLLECT PERSONAL INFORMATION

If you choose not to provide us with the personal information described within this policy, then:

- We may not be able to provide you with the product or services you have requested, either to the same standard or at all
- We may not be able to provide you with information about products or services that you may want, including information about discounts, sales or special promotions
- We may not be able to tailor our content, website and communications for your preferences

5. USE OF PERSONAL INFORMATION

We collect, hold, use and disclose your personal information for the following purposes:

- To provide products and services to you
- To provide you with information or advice about existing and new products and services
- To manage product or service warranties or guarantees, including product or safety recalls
- To communicate with you and process your requests
- To manage and enhance our products and services
- To personalise and customise your experience with us
- To provide you with access to secure areas of our websites, apps or notices about updates to the functionality of our websites
- To conduct competitions or promotions
- To verify your identity
- To provide it to third parties if you have authorised us to do so
- To conduct analysis across our businesses

- To conduct business processing functions for operation of our websites or our business, for our administrative, marketing, promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers
- To investigate if we have reason to suspect a breach of any of our terms and conditions or any suspected unlawful activity
- To help prevent unlawful activity
- To link previous actions that you have taken on our websites or in our stores with historic data that we have collected but have not been able to identify as yours.
- As required or permitted by any law (including the Privacy Act)

Your personal information will be collected by the NZPM business to which it was provided:

- NZPM Co-operative Limited, in the case of information provided to NZPM Co-operative
- Plumbing World Limited, in the case of information provided to Plumbing World
- Metrix Imports Limited, in the case of personal information provided to Metrix

Your personal information will be held at our support offices located at 65 Parnell Rise, Parnell, Auckland, 599 Main Street, Palmerston North and our branch network around New Zealand (as listed on our website). It may also be held for us in the data centres, platforms and systems of our third-party service providers, some of which may be located outside of New Zealand.

Your personal information will not be shared, sold, rented or disclosed other than as described within this policy or as permitted by the Privacy Act.

6. COOKIES

A “cookie” is a small text file that is placed on a device when it is browsing a website to enable the host of the website to store information about use of the website by that device. We use cookies and similar technologies for the following key purposes:

- To recognise your computer or device and greet you each time you visit our websites, without bothering you with a request to register or log-in
- To keep track of products or services you view, so that we can send you, directly or through third parties, news about those products or services or other similar or related products or services from across NZPM that we think you may be interested in
- To measure traffic patterns, to determine which areas of our websites have been visited, and to measure transaction patterns in the aggregate
- To research our users’ habits so that we can improve our products and services
- To operate our websites efficiently with a high level of functionality
- To measure the effectiveness of our marketing initiatives
- To learn about your preferences so that we can present you with web content and advertising that is relevant to you
- To measure the number of advertising referrals we have received to our websites from other websites

- To produce data on web traffic and customer web activity through our website or apps

While we use cookies to improve our customers' on-line experience, if you do not wish to allow cookies then you can choose to disable cookies (for all sites) from within your browser settings.

7. USE OF PERSONAL INFORMATION FOR MARKETING

We use personal information to provide you with information or advice about our existing and new products and services or those of other NZPM businesses. We also use it to conduct promotions on our own behalf and on behalf of selected third parties.

If at any stage, you no longer wish to receive these marketing communications you may unsubscribe by using the link in any promotional email, logging into your account and changing your preferences or contacting us at:

NZPM Co-operative Limited	privacy@nzpm.co.nz
Plumbing World Limited	privacy@plumbingworld.co.nz
Metrix Imports Limited	privacy@metrix.co.nz

We will not provide any personal information to an advertiser or any other third party without your express consent or in accordance with this policy.

If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us at privacy@nzpm.co.nz.

8. MOBILE

If you are using one of our mobile applications and you have notifications turned on, you are agreeing to accept notifications from us even when the mobile application is not running. Your notification preferences can be configured in the application's settings.

9. DISCLOSURE OF PERSONAL INFORMATION

We may disclose your personal information:

- To our employees, to the extent they need to have access your personal information for one of the purposes described above
- For the operation of our websites or our business
- For the specific purpose of fulfilling requests by you
- To provide products and services to you
- Where we are permitted to under the Privacy Act
- As otherwise detailed in this policy

Where we engage third parties to undertake services, we may provide those third parties with some of your information if it is required to fulfil those services and only to the extent required to fulfil those services. Examples of such third-party providers may include, but not limited to:

- Service providers such as web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisers such as accountants, solicitors, business advisors and consultants
- Software providers such as customer and shareholder relationship management and accounting software
- Existing or potential suppliers, business partners or joint venture entities or partners
- Sponsors, or promoters of any competition that we conduct or promote
- Specific third parties authorised by you to receive information held by us

We may disclose your personal information to manufacturers or suppliers of products or services for product warranty or guarantee fulfilment purposes, to facilitate repair of a product or where the manufacturer or supplier has advised that they need to contact you for any issues related to the quality or safety of the product or service you have purchased.

We require any third party to protect your information against unauthorised use or disclosure.

In addition to the above, we release personal information only when it is permitted under the Privacy Act or required by law for legal compliance and law enforcement (including to government agencies with statutory law enforcement responsibilities, and/or to your Internet Service Provider or network administrator); to facilitate court proceedings; enforce or apply our terms and conditions; or protect our or your rights, property, or safety and the rights, property and safety of our users, or others, and where we reasonably believe that disclosure is necessary. Government agencies with statutory roles enabling them to request data from us include the Police, Inland Revenue and the Ministry of Business, Innovation and Employment.

10. DISCLOSURE OF PERSONAL INFORMATION OUTSIDE OF NEW ZEALAND

We may disclose personal information to external service providers or entities located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information protect your personal information in a way that overall, provides comparable safeguards to those provided under New Zealand privacy laws.

11. PROTECTION OF PERSONAL INFORMATION

We will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access or modification. If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

12. RIGHT TO ACCESS OR CORRECT YOUR PERSONAL INFORMATION

You may request access to any personal information we hold about you at any time by contacting us at privacy@nzpm.co.nz.

Your request will be processed in accordance with the Privacy Act.

For employees, we will provide you with access or a reason why you can't access it within 20 working days or ask for an extension if needed.

If you make an access request, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

We may charge a reasonable fee for making your personal information available to you or providing you with copies of it.

If you believe that the personal information we hold about you is incorrect, incomplete or inaccurate, then you may ask us to amend it. We will consider if the information requires amendment and will not charge for making any amendments. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it. Registered users of our websites can access and update their user details online. We request that you keep your information as current as possible so that we may continue to improve our service to you.

13. EMPLOYEES AND APPLICANTS

We will take all reasonable steps to protect the privacy of our employees, personal information and any information collected by applicants during the recruitment process. Any information that we hold will be treated as confidential unless otherwise specified.

We will only hold information for as long as is legitimately required and for the purposes that we obtained it for.

For all employees using NZPM provided devices, these are managed by our NZPM Device Management Policy.

14. COMPLAINTS ABOUT A BREACH OF PRIVACY

If you believe that we have breached this policy or the Privacy Act or you have any questions or concerns about this policy, please contact us using the contact information below and provide details of the incident so that we can investigate it.

We have a formal procedure for investigating and dealing with complaints. Once the Privacy Officer receives a complaint the Privacy Officer will commence an investigation with the relevant business unit. The investigator will endeavour to determine the nature of any breach and how it occurred.

We may contact you during the process to seek further clarification if necessary. If a breach is found, the Privacy Officer will escalate the matter to management so that the process can be

rectified to prevent any further breaches from taking place. We will also contact you to inform you of the outcome of the investigation. We will endeavour to resolve all investigations within a reasonable time.

We will treat your requests or complaints confidentially.

You can contact our Privacy Officer by email at privacy@nzpm.co.nz or by post at: Privacy Officer, NZPM Co-operative Limited, PO Box 137 151, Parnell, Auckland 1151.

15. CHANGES TO THE PRIVACY POLICY

We may change this privacy policy from time to time. Updated versions of this policy will be posted on our website.

Reviewed by: Compliance Committee - 31 July 2023

Approved by: NZPM Board – 18 August 2023

Next Review Date – July 2025