

## Privacy Policy

Velux New Zealand Limited (NZBN 9429000070706) (**Velux, we, our, us**) is committed to respecting people's privacy. Velux is bound by the New Zealand Privacy Principles in the *Privacy Act 2020* (the **Privacy Act**), as well as other applicable laws protecting privacy. Velux will ensure that all the personal information that it handles is managed in accordance with those laws.

Please read the following Privacy Policy to understand how any personal information received by Velux will be treated. Velux may modify or update this Privacy Policy from time to time by publishing it on the Velux website [www.VELUX.co.nz](http://www.VELUX.co.nz). Velux encourages individuals to check the Velux website periodically to ensure that they are aware of Velux's current Privacy Policy.

If individuals do not agree with any terms of this Privacy Policy, we do not recommend use of our website or submission of any personal information to Velux.

### **What personal information does Velux collect and why?**

In New Zealand, under the Privacy Act, "personal information" means information about an identifiable individual.

Velux collects the personal information it needs to provide its products and information to its dealers, customers and the community, for its business operations and to comply with the law. If an individual chooses not to provide certain personal information to Velux, Velux may not be able to do business with that person or his or her organisation, or provide them with the products or information they require.

Velux will tell an individual why it is collecting personal information when Velux collects the information and how Velux plans to use the information, or these things will be obvious when the information is collected by Velux.

The following are the main types of personal information collected by Velux and the main purposes for which they are collected:

#### **1.1 As part of Velux's general business operations**

Velux collects personal information about individuals it employs or who are, or are employed by, Velux's suppliers (including third party service providers), contractors, related companies, agents and corporate customers. This information may include an individual's name, contact details and other information necessary for employment purposes or for Velux to conduct business with that person or his or her organisation.

#### **1.2 To assist with queries**

An individual may choose to provide Velux with personal information including his or her name, email address or other contact details when he or she contacts Velux by telephone, email, post or using its website. This information enables Velux to respond to any requests for information on matters such as Velux products, to arrange a measure and quote for installation of Velux' products, or to arrange for a skylight to be serviced. This information may be disclosed to relevant independent installers or dealers in order for Velux to assist the customer with their inquiry or arrange for services such as servicing or quotes.

#### **1.3 Customers and prospective customers**

Velux may collect the personal information of its customers and prospective customers, including an individual's name, contact details, payment and credit card details, credit information and other information necessary for Velux to conduct business with that person or his or her organisation. Velux may disclose this information to dealers or independent installers in order to process the customers' order, including arranging delivery of Velux's products to the customer, or assist with their enquiry.

#### **1.4 Marketing Communications**

With permission of an individual, Velux may use personal data to inform that individual of Velux's business operations, products and services. If an individual does not want Velux to use his or her personal information in this way, or to be sent any further information about Velux, the individual can contact Velux's Privacy Officer using the contact details provided at the end of this Policy.

#### **1.5 Visitor and customer surveys**

Velux may collect personal information from visitors to its website or customers as part of surveys regarding Velux's services and products.

#### **1.6 Prospective employees and contractors**

When an individual applies for a job or contract with Velux, Velux may collect certain information such as his or her name and contact details, information about his or her working history, relevant record checks and information on his or her professional interests. This may be collected from the individual directly, from any recruitment consultant and from the individual's previous employers and others, including referees and publicly available sources. This information is used to inform or assist Velux in its decision on whether or not to make the individual an offer of employment or engage the individual under a contract.

#### **1.7 To comply with the law**

Velux may also collect information about an individual as required or permitted by law.

### **How does Velux collect personal information?**

Velux will generally collect information directly from the individual to whom it relates. However, Velux may collect information about an individual from a third party, such as a contracting company, dealer, installer or via third party service providers. Velux may supplement the information it collects with information from other sources, such as generally available publications.

By using our services or providing us with personal information, individuals authorise us to contact such third parties for the purposes of providing services or information that an individual requests.

### **Use of personal information**

Velux uses and discloses personal information for the purposes for which it was collected, as described above. This primarily involves carrying out Velux's business operations, including in connection with an individual's recruitment or employment; managing supplier and customer relationships; for site safety and security purposes'; or as otherwise required or authorised by law.

If an individual has agreed or asked Velux to do so, Velux may also use that individual's personal information to keep the individual up-to-date with information about Velux.

Velux is committed to full compliance with the Unsolicited Electronic Messages Act 2007. If the individual does not want Velux to use the individual's personal information in this way or to be sent any further information / unsubscribe to such communications, the individual can contact Velux's Privacy Officer using the contact details provided at the end of this Policy. Once an individual has unsubscribed from Velux's email or text communications, we will remove them from the corresponding marketing list as soon as is reasonably practicable.

### **Disclosure of personal information**

In fulfilling these purposes, Velux discloses certain personal information to particular third party service providers, dealers or independent installers.

For the purposes described in this Policy, Velux may disclose personal information:

- to Velux's related companies;

- to dealers of Velux's products;
- to independent installers of Velux's products;
- to Velux's suppliers (including service and content providers), contractors and service providers, professional advisers and agents, including:
  - professional advisors such as lawyers, accountants and auditors;
  - providers or systems for recruitment management; and
  - data storage providers;
- to government agencies or regulatory bodies, where required;
- to anyone to whom Velux's assets or businesses (or any part of it) are transferred;
- where necessary to protect the rights or safety of any of its employees or a third party;
- where an individual to whom the personal information relates has consented to the disclosure; or
- where otherwise required or permitted by law. For example, Velux may disclose information in response to a subpoena, warrant, or request from a government enforcement agency, or as required under any laws or regulations.

#### **Disclosure of personal information of others**

An individual must not provide us with personal information of any other individual unless they have the express authorisation of that individual to do so. If such information is shared, before doing so an individual must:

- tell the other individual that their information will be shared with Velux in accordance with this Privacy Policy;
- provide that individual with a copy of (or refer them to this Privacy Policy; and
- warrant that consent has been given to provide information to Velux.

If this has not been done, Velux must be told before any third party information is provided.

#### **Cross border disclosures**

As Velux, through its related entities (the **Velux Group**), has operations in over 40 countries globally, Velux may disclose personal information to recipients that are located outside of New Zealand, including the United States of America, Denmark and other countries. A list of the countries in which the Velux Group operates is available at <http://www.velux.com/>.

In all cases, when an individual provides personal information to Velux, he or she consents to the disclosure of his or her personal information outside New Zealand. Overseas disclosure of an individual's personal information will only be made for one or more of the purposes specified in this Privacy Policy.

Velux will take the appropriate steps to ensure that transfers of personal information are in accordance with applicable law and to protect privacy rights, such as by ensuring disclosures are limited to recipients who are subject to privacy laws that provide a comparable level of legal protection as in the Privacy Act 2020 or where Velux is satisfied that alternative arrangements are in place to protect an individual's privacy rights.

#### **Cookies and IP address tracking**

The Velux website may use cookies for site administration purposes. Cookies are small files that store information on an individual's computer, mobile phone or other device. They enable the entity that put the cookie on the individual's device to recognise that individual across different websites, devices and/or

browsing sessions. Cookies serve many useful purposes. For example, cookies help us and third parties understand which part of our website is the most popular because they help us to see which pages and features visitors are accessing and how much time they are spending on the pages. By studying this kind of information, we are better able to adapt the website and provide individuals with a better experience.

If for any reason an individual wishes not to take advantage of cookies, the individual may have his or her browser not accept them, although this may disable or render unusable some of the features of Velux's website.

Velux's website may also detect and use an individual's IP address or domain name for internal traffic monitoring and capacity purposes or otherwise to administer the website. Patterns of usage of visitors to the website may be tracked for the purposes of providing improved service and content, based on aggregate or statistical review of user site traffic patterns.

### **Links to other sites**

Velux's website may contain links to other websites. Velux is not responsible for the privacy practices or the content of such other websites. The privacy policies applicable to such other websites may differ substantially from this Privacy Policy, so Velux advises individuals to read them before using those websites. Velux will not be liable for any use of those websites.

### **Security**

Velux takes all reasonable steps and implements a number of physical and electronic measures to protect personal information from misuse, loss and disclosure. It restricts access to Velux's physical and electronic databases, maintains firewalls and encrypts certain data where practicable to do so. Please note, however, that the internet is not a secure environment and although all care is taken, Velux cannot guarantee the security of information provided to it via electronic means.

### **Breach and Notification**

If a Privacy Breach occurs, Velux will investigate and assess the breach to determine whether we must notify the Privacy Commissioner and affected individuals to ensure that they are notified if their personal information is involved in a privacy breach likely to cause serious harm.

Even if the privacy breach is not notifiable by law, Velux may decide it is appropriate to notify the individual anyway.

As part of an individual's agreement in using our service, an individual agrees to notify us of any breach of any personal information or information accessed by our service, whether by security breach or unauthorised access. Individuals agree to use best endeavours to inform us of any such breach, including any personal information specifically affected.

### **Access and correction**

An individual has a right to access and request correction to most personal information that Velux has about that individual. In some circumstances, it may not be possible for Velux to provide the individual with all of his or her personal information for example if disclosing that information would impact on the privacy of another individual. Where Velux will not provide access to personal information held about an individual, Velux will inform the individual of the reason.

When an individual requests access to his or her personal information, Velux may need to take measures to verify the individual's identity before responding.

Velux takes reasonable steps to ensure that personal information is accurate whenever we collect, use or disclose it. We also rely on individuals to advise us of any changes to their personal information. If an individual thinks that any personal information Velux holds about him or her is inaccurate, the individual may contact Velux's Privacy Officer using the contact details at the end of this Policy and Velux will take reasonable steps to ensure that the information is corrected.

Velux will only keep an individual's personal information for as long as it is necessary to achieve the purpose Velux collected it for.

### **Complaints handling**

If an individual wishes to make a complaint about the way Velux has handled his or her personal information (including if the individual thinks Velux has breached the Privacy Act) the individual may do so by contacting Velux's Privacy Officer in writing, by using the contact details set out at the end of this Policy. If a complaint is made, the name and contact details of the complainant must be provided to Velux and details of the complaint must be given. Velux's Privacy Officer will investigate the complaint and respond promptly.

If the complainant considers that Velux has failed to resolve the complaint satisfactorily, the complainant may complain to the Office of the Privacy Commissioner in New Zealand.

### **Further information**

For further information about Velux's privacy policies or practices, please contact Velux's Privacy Officer by mail, email or phone on the contact details below:

#### **Postal address**

Privacy Officer

P O Box 12 632

Penrose, Auckland 1642

#### **Email Address:**

accounts@velux.co.nz

#### **Telephone Number:**

09 634 4126

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