

## Privacy Policy

VELUX Australia Pty Ltd (ABN 68 001 841 541) (**VELUX, we, our, us**) is committed to respecting people's privacy. VELUX is bound by the Australian Privacy Principles in the *Privacy Act 1988* (Cth) (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.com.au](http://www.VELUX.com.au). VELUX encourages individuals to check the VELUX website periodically to ensure that they are aware of VELUX's current Privacy Policy.

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

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.

If appropriate, VELUX will generally 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.

The Privacy Policy does not apply to acts and practices in relation to employee records of VELUX's current and former employees, who are exempt from the Privacy Act.

#### **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, independent installer or via third party service providers. VELUX may supplement the information it collects with information from other sources, such as generally available publications.

### **Use of personal information**

VELUX generally 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. If the individual does not want VELUX to use the individual's personal information in this way or to be sent any further information, the individual can contact VELUX's Privacy Officer using the contact details provided at the end of this Policy.

### **Disclosure of personal information**

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

Where appropriate, VELUX may handle personal information relying on exemptions that are available under applicable privacy laws, including, for example, the employee records exemption in the Privacy Act and provisions in the Privacy Act concerning the sharing of personal information among related bodies corporate.

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.

### **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 Australia, 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 Australia, and acknowledges that VELUX is not required to ensure that overseas recipients handle that personal information in compliance with Australian privacy law. However, VELUX will take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

### **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 implements a number of physical and electronic measures to protect personal information. 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.

### **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, or an exemption under the Privacy Act may apply. For instance, the employee records exemption may apply or VELUX may not provide access to information 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. 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.

### **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 Australian Information Commissioner.

### **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  
78 Henderson Road  
Alexandria, NSW 2015

#### **Email Address:**

customer.service@VELUX.com.au

#### **Telephone Number:**

02 8586 6000

Last updated: 23 May 2017