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# PRIVACY POLICY

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## THE BLUNDSTONE GROUP

The Blundstone Group consists of Blundstone Australia Pty Ltd, Blundstone (U.S.A.) Inc and Blundstone New Zealand Ltd, referred to as “Blundstone” “Blundstone Group”, “We”, “our” and “us” in this privacy policy. “We”, “our”, and “us” also includes third parties or organisations contracted to, or authorised to act on behalf of Blundstone.

This privacy policy applies to the Blundstone Group entities and meets the requirements of the following regulations:

1. Australian Privacy Principles under the Privacy Act 1988 (Cth)
2. Privacy Principles under the Privacy Act 2020 (New Zealand)
3. General Data Protection Regulation (EU) 2016/679
4. California Consumer Privacy Act (California Civil Code) 2018

To keep up with changing legislation and best practice we may revise this Privacy Policy at any time without notice. We will post any changes to this Privacy Policy on our websites, so we encourage individuals to check this Privacy Policy from time to time.

## OUR PRIVACY OBLIGATIONS

At Blundstone we recognise the importance of protecting the privacy of information provided to and collected by us, in particular, information that is capable of identifying an individual (“personal information”). We are committed to protecting personal information. This Privacy Policy aims to provide information on how we collect and process personal information (also known as personal data) and governs the manner through which personal information will be dealt with. This Privacy Policy will be reviewed periodically and we welcome comments and feedback.

## PERSONAL INFORMATION AND DATA

For the purposes of this policy “personal information” is to be read as “personal data” for General Data Protection Regulation compliance purposes.

Personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed such as aggregated data. If an individual cannot be identified by the data we collect or hold then it is not considered personal information and this Privacy Policy does not apply.

Examples of personal information include an individual’s name, email address, telephone number(s), workplace contact details, payment information, support queries, comments on social media streams and information we may collect about an individual’s preferences. More information about what we collect is provided below.

## WHAT PERSONAL INFORMATION IS COLLECTED?

We collect personal information necessary for Blundstone to provide products and services and perform our business functions. We will only collect data by lawful and fair means.

We may collect personal information from:

- our customers and consumers.
- potential, current, and former employees and contractors to the Blundstone Group.
- third parties providing products or services to the Blundstone Group, including (but not limited to) suppliers, distributors, manufacturers, wear testers, models, influencers, and those we sponsor.

We may collect, use, store and transfer different kinds of personal information which we have grouped together as follows:

- **Identity Data** includes full name, username or similar identifier, title, date of birth, gender and government tax identification numbers for businesses and individuals.
- **Employment Data** information regarding an individual’s employment including company, employment history and other documents and information regarding education and qualifications.
- **Contact Data** includes billing address, delivery address, email address and telephone number(s).
- **Transaction Data** includes details about payments to and/or from an individual, and details of products and

services purchased from us or products or services provided to us.

- **Technical Data** includes internet protocol (IP) addresses, an individual's login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access our websites.
- **Profile Data** can include an individual's username and password, purchases or orders made, interests, preferences, feedback and survey responses, testimonials about our products and services, complaint details.
- **Usage Data** includes information about how our websites, products and services are used by individuals.
- **Marketing and Communications Data** includes communications content preferences.
- **Financial Data** such as credit card details. Where we manually process a payment and the details have been provided over the telephone the Financial Data is immediately entered into the payment portal and is not retained or stored. Where Financial Data has been provided to us unsolicited by the customer via email we will use the Financial Data to process payment and then immediately permanently delete the email. Financial Data is not retained or stored. Where a reoccurring payment occurs the payments are processed via a third-party payment provider and we do not receive any Financial Data. When customers purchase directly from our websites they will be directed to an unaffiliated payment service ("Payment Service") to make payment. When using a Payment Service, a customer will be directed to the webpage for that Payment Service. Any information provided when using a Payment Service may be collected and used by the Payment Service provider in accordance with that provider's privacy policy. Individuals should check the provider's privacy policy to understand how it will handle their personal information. We do not retain or store any of that Financial Data.
- **Aggregated Data** such as statistical or demographic data. Aggregated Data may be derived from personal information but is not considered personal information in law as this data does not directly or indirectly reveal an individual's identity. For example, we may aggregate Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with personal information so that it can directly or indirectly identify an individual, we treat the combined data as personal information which will be used in accordance with this Privacy Policy.

## SENSITIVE INFORMATION

Sensitive information is personal information that includes information or an opinion about an individual's racial or ethnic origin, political opinions, or associations, religious or philosophical beliefs, trade union memberships or associations, sexual orientation or practices, criminal record, health or genetic information or biometric information.

We only collect sensitive information with an individual's consent. We may request sensitive information such as health information or a national Police Check for criminal records for use in pre-employment screening or during the course of employment with us. We may also hold trade union membership details where an employee requests that their fees are paid by Blundstone on their behalf. We will only use the sensitive information for the purpose expressly stated in the consent given, and we will only retain the sensitive information for as long as we need it.

## IF YOU FAIL TO PROVIDE PERSONAL INFORMATION (ANONYMITY & PSEUDONYMITY)

Where practicable, we will allow an individual to deal with us on an anonymous or pseudonymous basis. If this is practicable we will only solicit information in this way. However, if it is not practicable for the purposes for which information is collected then we will seek the personal information required as set out in this Privacy Policy.

Where we need to collect personal information, by law, or under the terms of a contract, and it is not provided when requested we may not be able to perform the contract (for example, to provide goods or services). In this case, we may have to cancel a product or service with notice.

## CHILDREN

We do not intend to collect personal information of children. If a parent or guardian of a child who is under the legal age for the relevant jurisdiction believes that we may have collected a child's personal information they can contact us at [dataprivacy@blundstone.com.au](mailto:dataprivacy@blundstone.com.au).

## HOW IS YOUR PERSONAL INFORMATION COLLECTED?

### *Direct interactions*

We may ask for certain types of personal information where an individual wishes to:

- obtain a particular service or product from us
- make a warranty claim or return a product to us
- apply for a job with us
- create a customer (credit) account
- apply to become, or become a distributor of our products
- apply to provide or provide services to us as a contractor, wear tester, model or influencer
- apply for sponsorship.

This might happen over the telephone, via email, through social media or our website, by filling in a paper or online form, or meeting with us face-to-face. We will give a collection notice at the time, to explain how we will use the personal information we were asking for. The notice may be written or verbal.

### *Unsolicited information*

Where personal information is provided to us unsolicited, that is personal information we have not directly asked for, we will retain it where it falls within our primary purposes for collection of personal information as set out in this Privacy Policy, and deal with it in accordance with this Privacy Policy.

Personal information may also be provided for us to use without us directly asking for it, for example when an individual engages with us on social media or on our website. This includes personal information provided when an individual:

- applies for our products or services
- creates an account on our websites
- browses our products and services and generally interact with our websites
- interacts with our customer service, sales, marketing or design teams
- subscribes to our service or publications
- selects content communication preferences via our website or other means
- enters a competition, promotion or survey
- gives us some feedback
- voluntarily submits personal information to us for any reason.

### *Information we collect from others*

Where an individual applies for a job or contract with us, we may collect personal information from referees, pre-employment screening agencies engaged by us and from criminal history searches from relevant government departments. We may also conduct credit checks on customers and check some details about our suppliers and other third-party providers from publicly available sources.

Additionally, we may receive personal information from the following parties:

- analytics providers
- advertising networks
- search information providers
- technical and delivery services.

## Cookies

As individuals interact with us via our websites, we may automatically collect Technical Data about an individual's equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies. We may also receive Technical Data about an individual when they visit other websites employing our cookies. Cookies are data that a website transfers to an individual's hard drive for record-keeping purposes. Cookies, which are industry standard and are used by most websites, including those operated by us, can facilitate a user's ongoing access to and use of a site. They allow us to customise the website to user's needs. There is a simple procedure in most browsers that allows users to deny or accept the Cookie feature in the event that a user does not want information collected through the use of Cookies, however Cookies may be necessary to provide some features of our on-line services.

## HOW WE USE YOUR PERSONAL INFORMATION

Most commonly, we will use personal information in the following circumstances:

- to provide services or products
- process payments to and from suppliers, customers, distributors, contractors, advisors
- recruitment activities
- establishing consumer, customer and supplier accounts
- engaging with and managing contractors
- engaging with and managing commercial relationships with manufacturing partners, suppliers, distributors, customers and consumers
- engaging with and managing relationships with wear testers, influencers and models
- processing payments to and from suppliers, customers, distributors, contractors, advisors and other third parties including satisfying regulatory obligations including but not limited to taxation obligations
- where we need to perform a contract / activity
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- where we need to comply with a legal or regulatory obligation
- to provide technical or other support
- to answer enquiries about our services, or to respond to a complaint or warranty claim
- to promote our other programs, products or services which may be of interest to individuals (unless they have opted out from such communication)

We may use personal information for other purposes with consent, which can be withdrawn at any time by contacting us.

In addition, there may be other types of lawful purposes necessary to process personal information from time to time.

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL INFORMATION

We have set out below, in a table format, a description of all the ways we may use personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to provide the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on individuals (both positive and negative) and an individual's rights before we process personal information for our legitimate interests. We do not use personal information for activities where our interests are overridden by the impact on an individual (unless we have consent or are otherwise required or permitted to by law). Further information about how we assess our legitimate interests against any potential impact in respect of specific activities can be obtained by contacting us.

‘Performance of Contract’ means processing personal information where it is necessary for the performance of a contract or to take steps at an individual’s request before entering into such a contract.

‘Comply with a legal or regulatory obligation’ means processing personal information where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Note that we may process personal information for more than one lawful ground depending on the specific purpose for which we are using the data. Please contact us to obtain need details about the specific legal ground we are relying on to process personal information.

**Change of purpose**

We will only use personal information for the purposes for which we collected it and have consent for, unless we reasonably consider that we need to use it for another reason and that reason is related to the primary purpose and an individual would reasonably expect it could be used for that purpose.

If we need to use personal information for an unrelated purpose, in order to satisfy a legal or regulatory obligation, we will notify the individual and explain the legal basis which allows us to do so.

Please note that we may process your personal information without knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Purpose/Activity	Type of information or data	Lawful basis for processing including basis of legitimate interest
To set up accounts and engaging with customer / supplier / distributor / wear tester / contractor / influencers and other third parties	Identity Contact	Performance of a contract Necessary to comply with a legal obligation. Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/ services)
To process, deliver and receive orders and returns including: <ul style="list-style-type: none"> <li>• Manage payments, refunds, fees and charges</li> <li>• Collect and recover money owed to us</li> </ul>	Identity Contact Financial Transaction	Performance of a contract Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>• Notifying you about changes to our terms or privacy policy</li> <li>• Asking you to leave a review or take a survey</li> <li>• Responding to enquiries about our goods or services</li> <li>• Responding to a complaint or warranty claim</li> </ul>	Identity Contact Profile Marketing and Communications	Performance of a contract Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/ services)
Recruitment activities	Identity Contact Employment data	Necessary for our legitimate interests (to recruit employees for our business)
To enable customers and consumers to partake in a prize draw, competition or complete a survey	Identity Contact Profile Usage Marketing and Communications	Performance of a contract Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

Purpose/Activity	Type of information or data	Lawful basis for processing including basis of legitimate interest
To administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements and measure or understand the effectiveness of the advertising we serve	Identity Contact Profile Usage Marketing and Communications Technical	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations about goods or services that may be of interest to customers and consumers	Identity Contact Technical Usage Profile Marketing and Communications	Necessary for our legitimate interests (to develop our products/ services and grow our business)

### **Marketing and communications**

We strive to provide relevant communications content preferences.

We may use Identity, Contact, Technical, Usage and Profile Data to form a view on what we think individuals may want, or what may be of interest to them. This is how we decide which content and offers may be relevant (we call this marketing).

Whether an individual has signed up to receive newsletters, requested information from us or purchased goods or services from us, or provided us with details when they entered a competition or registered for a promotion we will ensure we have consent before sending any marketing communications from us.

### **Opting out**

Individuals can ask us to stop sending content or marketing messages at any time by logging into our websites and checking or unchecking relevant boxes to adjust marketing preferences or by following the opt-out links on any marketing message sent, or by contacting us at any time.

Opting out of receiving marketing communications does not void the personal information provided to us as a result of a product/service purchase or other transactions.

## **DISCLOSURES OF YOUR PERSONAL INFORMATION**

### **Disclosure**

Apart from where consent has been given, or disclosure is necessary to achieve the purpose for which it was submitted, personal information may be disclosed in special situations where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring, or interfering (intentionally or unintentionally) with our rights or property, users, or anyone else who could be harmed by such activities. Also, we may disclose personal information when we believe in good faith that the law requires disclosure.

### ***Third party service providers***

We may engage third parties to provide goods or services on our behalf. In that circumstance, we may disclose personal information to those third parties in order to meet an individual's request for goods or services. Our third-party service providers are required to only use personal information on our behalf, under our instructions.

This Privacy Policy also covers all third-party people or organisations contracted, employed and/or authorised by Blundstone specifically to undertake activities or functions on its behalf.

We require all third parties to respect the security of personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use personal information for their own purposes and only permit them to process personal information for specified purposes and in accordance with our instructions.

All such third-party agents will be required to meet all Blundstone privacy policies and requirements.

### ***International transfers***

We are a global business and may disclose personal information to overseas recipients including contractors, data processors and other trusted third parties including the transfer of relevant personal information to the relevant in-country approved Blundstone distributor for actioning. That Blundstone distributor will be subject to the relevant laws and regulations of its own country or territory in relation to any personal information it receives. Individuals should check the relevant Blundstone distributor's privacy policy to understand how it will handle personal information.

Blundstone may choose to store personal information outside of an individual's country of residence and country of collection.

If we disclose personal information to an overseas recipient, we will take steps to ensure that the recipient keeps personal information safe and complies with this Privacy Policy.

## **HOW DOES BLUNDSTONE HOLD THE PERSONAL INFORMATION AND MANAGE THE QUALITY AND SECURITY OF THE DATA?**

We may hold personal information in either hard copy or electronic form.

To the extent required by law we will take reasonable steps to make sure that the personal information that we collect, hold, use and disclose is accurate, complete and up to date and protect the personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

### ***Destruction and deidentification***

Blundstone will take reasonable steps to ensure that personal information which is no longer required is destroyed or de-identified in a secure manner.

### ***Security of personal information provided via electronic means***

We strive to ensure the security, integrity and privacy of personal information submitted to or through our websites or via other electronic means, and we review and update our security measures in light of current technologies and changing regulations. Unfortunately, no data transmission over the internet can be guaranteed to be totally secure.

However, we will endeavour to take all reasonable steps to protect the personal information transmitted or provided to us online. Once we do receive a transmission, we will also make our best efforts to ensure its security on our systems.

In addition, our employees and the contractors who provide services related to our information systems, including our websites, are obliged to respect the confidentiality of any personal information held by us.

We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal information to those employees, agents, contractors and other third parties who have a business requirement to know. They will only process personal information on our instructions, and they are subject to a duty of confidentiality and to do so in accordance with their obligations to the law.

We have put in place procedures to deal with any suspected personal information breach and will notify relevant individuals and any applicable regulator of a breach where we are legally required to do so.



### How long will you use my personal information for?

We will only retain personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, tax or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of personal information, the purposes for which we process personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances an individual can ask us to delete their personal information, further information is provided below under the heading "Legal rights".

In some circumstances we may aggregate and anonymise personal information (so that it can no longer be associated with an individual) for research or statistical purposes in which case we may use this information indefinitely without further notice.

### Website links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data. We do not control these third-party websites and are not responsible for their privacy policies. When a user leaves our website, we encourage they read the privacy policy of every website visited.

### Legal rights

Individuals have a number of other rights in relation to the personal information we hold including the right to:

- access their own personal information
- request the correction of their own personal information
- seek human review of automated decision making or profiling
- opt-out of direct marketing, and profiling for marketing
- opt-out of processing for research / statistical purposes, or processing on the grounds of '*public interest*' or '*legitimate interest*'
- erasure
- data portability
- temporary restriction of processing.

### Accessing or correcting personal information

Individuals have the right to request access to the personal information we hold about them. Unless an exception applies, we must allow an individual to see the personal information we hold about them, within a reasonable time period, and without reasonable expense.

An individual also has the right to request the correction of the personal information we hold about them. We will take reasonable steps to make appropriate corrections to that personal information so that it is accurate, complete and up-to-date. Unless an exception applies, we must update, correct, amend or delete the personal information we hold about an individual within a reasonable time period.

We will not charge a fee for an individual to access personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if a request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with a request in these circumstances.

We may need to request specific information to help us confirm an individual's identity and ensure an individual's right to access their personal information (or to exercise any other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact the individual making the request to ask for further information to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if the request is particularly complex or there are a number of requests. In this case, we will notify and keep the individual updated. To seek access to, or correction or, personal information, a contact us.

**Erasure**

Individuals have a right to request erasure of personal information. This enables an individual to ask us to delete or remove their personal information where there is no good reason for us continuing to process it. An individual also has the right to ask us to delete or remove personal information where they have successfully exercised your right to object to processing (see below), where we may have processed their personal information unlawfully or where we are required to erase personal information to comply with local law. Note, however, that we may not always be able to comply with requests of erasure for specific legal reasons which provide notice of, if applicable, at the time of the request.

**Object to processing**

Individuals have the right to object to processing of personal information where we are relying on a legitimate interest (or those of a third party) and there is something about that individual’s particular situation which makes them want to object to processing on this ground as they feel it impacts on their fundamental rights and freedoms.

Individuals also have the right to object where we are processing their personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process their information which override their rights and freedoms.

**Restriction of processing**

Individuals have the right to request restriction of processing of their personal information. This enables them to ask us to suspend the processing of their personal information in the following scenarios:

- (a) to establish the data’s accuracy
- (b) where our use of the information is unlawful but erasure is not required
- (c) where an individual needs us to hold the information even if we no longer require it as they need it to establish, exercise or defend legal claims, or
- (d) an individual objects to our use of their personal information but we need to verify whether we have overriding legitimate grounds to use it.

**Portability**

Individuals have the right to request the transfer of their personal information to themselves or to a third party. We will provide to that individual, or a third party they have chosen, their personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which that individual initially provided consent for us to use or where we used the information to perform a contract with them.

**Withdrawal of consent**

Consent can be withdrawn at any time where we are relying on consent to process personal information. However, this will not affect the lawfulness of any processing carried out before the withdrawal of consent. If consent is withdrawn, we may not be able to provide certain products or services to that individual. We will advise if this is the case at the time consent is withdrawn.

Any of the above rights can be exercised by contacting us.

**TO CONTACT OUR PRIVACY OFFICER**

Enquiries or a complaint about the way we handle personal information, or to seek to exercise privacy rights in relation to the personal information we hold, should be directed to our Privacy Officer as follows:

By mail:	Blundstone Group Attention: Blundstone Privacy Officer 88 Gormanston Road, Moonah TASMANIA, AUSTRALIA 7009
By email:	<a href="mailto:dataprivacy@blundstone.com.au">dataprivacy@blundstone.com.au</a>
By telephone:	+61 03 6271 2200



While we endeavour to resolve complaints quickly and informally, formal privacy complaints are to be made in writing to our Privacy Officer by email or mail as above. We will acknowledge a formal complaint within 10 working days.

Where an individual feels that we have not resolve their privacy complaint to their satisfaction, that individual may lodge a complaint with the following authorities, according to their location:

- Australia:** Office of the Australian Information Commissioner (OAIC)  
Telephone: 1300 363 992  
online: [www.oaic.gov.au](http://www.oaic.gov.au)  
mail: GPO Box 5218, Sydney NSW 2001, Australia
- New Zealand:** Privacy Commissioner  
Telephone: 0800803 909  
email: [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz)  
mail: PO Box 10-094, The Terrace, Wellington 6143, New Zealand
- California:** Attorney General's Public Inquiry Unit  
Telephone: (916) 210-627 / (800) 952 522  
online: [www.oag.ca.gov](http://www.oag.ca.gov)  
mail: PO Box 944255 Sacramento CA 94244-2550
- European Union:** Data Protection Authority  
online: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)