

Coventry Group Ltd Privacy Policy

About this policy

Coventry Group Limited (CGL) and its entities are committed to protecting your privacy and personal information. We collect, hold, use and disclose personal information to assist us in carrying on our business, including to provide products and services to you. In this policy we explain how we collect your personal information, how we hold, use and disclose it and what controls you have over it and our use of it.

This policy is available on our websites at cgl.com.au; cooperfluidsystems.com.au; artia.com.au; konnctfasteningsystems.com.au; konnctfasteningsystem.co.nz; and torqind.com.

Accessing this site indicates your acceptance of our Privacy Policy.

Personal information

For the purposes of this Privacy Policy and applicable data protection and privacy laws:

- “Personal Information” is defined as information and data, whether recorded in a material form or not, relating to an identified or identifiable natural person that is processed by or on behalf of CGL, whether or not by automated means; and
- CGL is considered the “data controller” in respect of the Personal Information that it collects, uses and manages in connection with this Privacy Policy.

The Privacy Act applies to "personal information" relating to a natural living person. In order for CGL to provide you with the products and services you request, we may collect and store personal information about you which includes:

- name, date of birth and age;
- identification information, including signature, and driver’s licence number;
- contact details, including personal and business addresses, email addresses and telephone numbers;
- details of a family member you register for an in-store event, competition or promotion, including name and age;
- details about your purchases and orders from us and your product and services preferences;
- vehicle number plate details;
- employer or business details;
- financial information, including bank and cheque account details and credit card details, and information about your credit history;
- images from video surveillance and other cameras in our stores (including in car parks, pick up areas and store entrances); and
- if you apply for employment with us, details regarding your employment history, educational qualifications and similar information.

This information allows us to identify you. In certain circumstances, we may also collect sensitive information such as your membership of a professional or trade association.

Collection

CGL collects personal information about you when you send us an order, deal with us over the telephone, visit our website or visit us in person. We may also receive personally identifiable information from other sources, such as:

- if you purchase or order any product from us;
- if you visit a CGL store or if you contact CGL, including to make an inquiry regarding our products and services, to make a complaint, to provide feedback, to seek a refund, or to attend an event;
- if you are a supplier or service provider, in connection with the supply of products and services by your business to CGL;

- if you access our website, including by the use of cookies (which are small data files transferred onto devices when a website is accessed), which may track what you view on our website and also other websites that you visit;
- if you hire equipment from our stores where we supply that equipment as agent for a third party, that third party may share your hire details with us;
- if you interact with CGL via social networking services;
- if you subscribe to any of our mailing lists or use any of our online applications;
- if you participate in any competition that we conduct;
- if you apply for a CreditorWatch or Equifax account or any other type of credit account with CGL;
- via our security cameras or other cameras installed in our stores (including in car parks, pick up areas and store entrances);
- if you undertake any of CGL's induction, safety or compliance processes; or
- if you submit an employment application to us.

We may also collect personal information about you from:

- publicly available sources, including from Australian Government agencies such as the Australian Securities and Investments Commission, New Zealand Companies Office, internet search platforms and social media platforms;
- any person authorised to act on your behalf or authorised to provide your personal information to CGL;
- credit reporting bodies and other credit providers, if you apply for a CreditorWatch or Equifax account or any other type of credit account with CGL;
- any persons you nominate, if you submit an employment application to us; and
- our related companies.

Generally we will tell you why we are collecting the information when we collect it and how we plan to use it if not obvious to a reasonable person at time of collection. We only collect personal information that is necessary to provide you with our products and services. We will only collect sensitive information with your express consent. If you do not consent to certain uses of your personal information we may not be able to provide you with your requested products or services.

Use and disclosure

We use and disclose your personal information in connection with carrying on our business, including to provide products and services to you.

CGL may use your personal information:

- to charge you for products and services we provide to you and to prepare invoices and sales records for such purchases;
- to provide advice regarding our products and services to you (or arrange for others to do so at our request);
- to deliver our products and services to you;
- to consider feedback and complaints that you may make to us
- to provide refunds and exchanges;
- to promote and advertise our products and services (including by including your feedback in our advertising) and to undertake competitions and events;
- to undertake product recalls;
- to monitor our sales of products and services and for quality control purposes, including undertaking customer surveys and analysis;
- to determine your product or service preferences and preferred store locations;

- in the case of our suppliers or service providers, to manage the provision of products and services to us;
- to monitor customer traffic in our stores and identify high traffic areas or frequently visited locations in our stores;
- to assist us to develop and deliver new products and services;
- to assess any application that you make to us for a CreditorWatch or Equifax account or other credit account of any nature;
- to assist us in ensuring security, health and safety and customer protection in our stores (including car parks, pick up areas and store entrances);
- to assist us, our service providers and related companies in investigating and preventing any potential, suspected or actual breaches of law or fraudulent activities;
- to recruit our employees or engage contractors;
- for any other purpose disclosed to you at the time the relevant personal information is collected; and
- for purposes directly related to any of the above.

We work with a number of third parties in carrying on our business and may disclose your personal information to:

- third parties to facilitate the provision of products and services to you (including to facilitate repairs and customer recalls), such as to product manufacturers and suppliers, couriers and installers;
- third parties, if you hire equipment from us which we supply as an agent for that third party;
- marketing, advertising and promotions services providers and event organisers in connection with CGL's marketing, advertising and events;
- third parties who provide services to CGL in connection with our business operations, monitoring trends in customer preferences or transactions and the operation and maintenance of our website, as well as our online services or online applications;
- credit reporting agencies and other credit providers, to assist in assessing any application that you make to us for a CreditWatch account or other credit account, of any nature;
- third parties who provide other administrative and operational services to CGL in connection with our business, including for example financial institutions, security services providers, market research companies, IT service providers, payment processors and collectors, mailing houses and card manufacturers;
- CGL professional advisers, where required to enable any such adviser to provide services to CGL;
- third parties necessary to assist us in investigating and preventing any potential, suspected or actual breaches of law or fraudulent activities;
- law enforcement agencies, government agencies or other third parties, where required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process);
- other persons disclosed to you at the time the relevant personal information is collected; and
- related companies of CGL.

Transfer of information overseas

Some of our service providers may be located overseas or may store information (including your personal information) that we provide to them overseas. We may also provide your personal information to related companies of CGL that are located overseas. Therefore the personal information you provide to us may be held overseas. The jurisdictions in which the personal information you provide to us may be held include Australia and New Zealand.

Personal information you disclose to us will only be held or processed overseas in accordance with all applicable law.

Links to other websites

This website may contain links to websites of third parties. CGL will not be responsible for the privacy practices or content of these linked sites. You should read the privacy policy on the linked site to find out how the third party collects and uses your personal information.

Website fiscal information

Unless otherwise stated, all details on this website should be considered unaudited. CGL reserve the right to update, where necessary, unaudited information to reflect changes in the business' veracity.

Marketing and advertising

As part of CGL's functions and business activities and to promote the services we can provide to you, CGL may use and disclose to third parties personal information that you have provided to us for the purposes of advertising (including online behavioural advertising) and direct marketing. We may engage third parties to assist us in ensuring that the marketing and advertising we provide is of interest to you. Direct marketing includes, but is not limited to, CGL or third parties sending to you and/or contacting you directly in relation to promotions and information about CGL's products and services. Generally, we will provide direct marketing to you where you have requested or consented to receiving such information. You can opt out of receiving direct marketing communications by using the opt out link or details provided in the direct marketing communication or sending an email to the CGL CFO r.jackson@cgl.com.au.

The third parties we engage to assist us in marketing and advertising may use cookies (that is, small data files transferred onto devices when a website is accessed) and other technologies to obtain information about your preferences when you access online platforms or websites other than the CGL website. Your preferences collected in this manner may be disclosed to us.

Security and storage

CGL will take reasonable steps to protect the security of your personal information that we hold, including both paper and electronic records. We have security measures in place to attempt to reasonably protect personal information under our control from misuse, interference, loss, unauthorised access, modification or disclosure. For example, CGL seeks to ensure that personal information in paper form is held securely and personal information held electronically by or for CGL is held on secured servers in controlled facilities.

No data transmission over the internet can be guaranteed to be secure. As a result, CGL cannot ensure or warrant the security of any personal information transmitted by you to CGL over the internet.

Questions and Complaints

If you have any questions or complaints about this Policy, CGL's collection of your personal information or the way in which CGL deals with your personal information, this should be directed to the Chief Financial Officer using the contact details set out under the heading "Contact Details".

We will promptly investigate any complaint you make to us and attempt to resolve that complaint. If you are not satisfied with CGL's proposed resolution of your complaint, or if we do not respond to you within 30 days of the date you make the complaint, then you may, if you are in Australia, contact the Office of the Australian Information Commissioner or, if you are in New Zealand, the New Zealand Privacy Commissioner to resolve that complaint:

Australia:

Office of the Australian Information Commissioner

www.oaic.gov.au

1300 363 992

New Zealand:

New Zealand Privacy Commissioner

www.privacy.org.nz

0800 803 909

Contact details

Please contact our Chief Financial Officer if you have any questions, complaints or would like further information about this Privacy Policy.

Chief Financial Officer

Phone: +61 3 9205 8215

235 Settlement Road,

Thomastown, Vic 3074

r.jackson@cgl.com.au

These terms may change

These terms are subject to change at any time without notice. You should regularly check this Privacy Policy as privacy is an area of law that is rapidly developing. This privacy policy was last updated in November 2018.

Who we are

References to 'Coventry Group', 'Coventry Group Ltd' and/or 'CGL' in this Privacy Policy mean Coventry Group Limited of 235 Settlement Road, Thomastown, Victoria 3074 Australia; Coventry Group (New Zealand) Limited of 11 Bruce Roderick Drive, East Tamaki, Auckland 2013 New Zealand; and its owned entities of Artia Cabinet Hardware Systems, Cooper Fluid Systems, Konnect Fastening Systems Australia, Konnect Fastening Systems New Zealand, and Torque Industries, or the local CGL entity in which your Personal Information is collected. For a full list of CGL locations, please see [here](#).

Terms and Conditions

Please refer to [Terms and Conditions](#)

Disclaimer

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