



The Jewellery Group Pty Limited

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The Jewellery Group Privacy Policy - 2.49

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Purpose & Scope

At The Jewellery Group protecting your privacy and the confidentiality of your "personal information" is very important to us and is fundamental to the way we serve you.

When you give your personal information to us it is a serious responsibility. We are committed to protecting your personal information and giving you a choice in who can use your personal information and how it may be used.

In this policy, "us", "we" or "our" means The Jewellery Group Pty Limited (ABN 25 124 077 729) and its related bodies corporate.

This policy sets out:

- what is considered personal information;
- what personal information we collect and hold;
- how we collect, hold, use or disclose personal information;
- the purpose for which we collect personal information;
- what happens if we are not able to collect personal information;
- how to seek access to and correct your personal information;
- whether we disclose personal information outside Australia; and
- how to contact us.

We are bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (subject to exemptions that apply to us under the Act).

We may, from time to time, review and update this policy, including taking account of new or amended laws, new technology and/or

changes to our operations. All personal information held by us will be governed by the most recently updated policy.

WHAT IS PERSONAL INFORMATION

When used in this policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses) and possibly financial information, including your credit card, direct debit or finance information. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number;
- age or birth date;
- profession, occupation or job title;
- special dates or events;
- details of the products or services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products or services and to respond to your enquires;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our website or online presence through our representatives or otherwise;
- information you provide to us through our stores or customer surveys.

COOKIES

In some cases we may also collect your personal information through the use of cookies. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognize your computer and greet you each time you visit our website, without bothering you with a request to register or log-in. It also helps us keep

track of products or services you view, so that we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited, and to measure patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. We may also log IP addresses (the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user movements, and gather broad demographic information.

We may also collect anonymous data (which is not personal information) relating to your activity on our websites (including IP addresses) via cookies, or we may collect information from you in response to a survey. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve the quality of our products and services. However, to the extent that this information does not constitute personal information because it does not identify you or anyone else; the Australian Privacy Principles do not apply and we may use this information for any purpose and by any means whatsoever.

HOW WE COLLECT PERSONAL INFORMATION

We collect your personal information directly from you unless it is unreasonable or impractical to do so.

We do this in ways including:

- through your access and use of our website, apps, facebook or other social media sites or sending SMS/MMS to us;
- during conversations between you and our employees;
- when you register to join our VIP programme;
- when you complete an application for a promotion or purchase; and
- through someone else who has provided us with your information (e.g. gift cards).

We may also collect personal information from third parties including:

- third party companies such as credit reporting agencies, law enforcement agencies and other government entities;
- mailing lists;
- recruitment agencies;
- contractors or business partners.

WHY DO WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

The primary purpose for which we collect information about you is to enable us to perform our business activities and functions and to provide the best possible quality of customer service possible. We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you;
- to provide you with updates, information or advice about our existing and new products and services;
- to communicate with you including by email, mail or telephone;
- to manage and enhance our products and services;
- to personalise and customise your experience;
- to inform you of upcoming special events;
- to conduct competitions or promotions on behalf of The Jewellery Group and selected third parties;
- to verify your identity;
- to disclose as part of business data to third parties if you have authorised us to do so;
- to conduct business processing functions for operation of our websites or our business;
- for our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers;
- to provide your updated information to us, our contractors or external service providers;
- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity; and/or
- as required or permitted by any law (including the Privacy Act).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

WHAT HAPPENS IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION

If you do not provide us with the personal information described in this policy, some or all of the following may happen:

- we may not be able to provide you with the products or services you requested, either to the same standard, or at all (for example, if you do not register as a VIP you may not be able to access the services or benefits reserved for VIP members only);
- we may not be able to provide you with information about products and services that you may want, including information about discounts, sales or special promotions; or
- we may not be able to offer your certain products that require the registering of your personal information to identify you (for example, Extended Care Plans);
- we may be unable to tailor the content of our websites to your preferences and your experience of our website may not be as enjoyable or useful.

HOW DO WE DISCLOSE YOUR PERSONAL INFORMATION

We may disclose your personal information to:

- our employees, related bodies corporate, contractors or external service providers for the operation of our websites or our business, fulfilling requests by you, and otherwise provide products and services to you, including without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, electronic network administrators, debt collectors, and professional advisers such as accountants, solicitors, business advisors and consultants;
- our existing or potential agents, business partners or joint venture entities or partners;
- our sponsors, or promoters of any competition that we conduct or promote;
- specific third parties authorised by you to receive information held by us;
- the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary;
- as required or permitted by any law (including the Privacy Act).

DIRECT MARKETING MATERIALS

We may send you direct marketing communications and information about products and services that we consider may be of interest to you. These communications may be sent in various forms, including

mail, SMS or email, in accordance with applicable marketing laws, such as the Spam Act 2004 (Cth). If you indicate a preference for a method of communication, we will endeavor to use that method whenever practical to do so.

In addition, at any time, you may opt-out of receiving marketing communications from us by contacting us (details below) or by using the opt-out facilities provided (e.g. an unsubscribe link), or by updating your personal details in store. We will then ensure that your name is removed from our mailing list. We do not provide your personal information to other organisations for the purposes of direct marketing unless expressly authorised by you.

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 using the details provided below.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You may request access to any personal information we hold about you at any time by contacting us (details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We will not charge for simply making a request and will not charge for making any corrections to your personal information. 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.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. 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.

We request that you keep your information as current as possible so that we may continue to serve you or improve our service to you.

HOW YOU CAN COMPLAIN ABOUT A BREACH OF PRIVACY

If you believe your privacy has been breached by us, have any questions or concerns about our Privacy Policy please, contact us using the contact information below and provide details of the incident so that we can investigate it.

Once the Privacy Officer receives a complaint, whether it is in writing or by verbal means, the Privacy Officer will commence an investigation with the relevant business unit from which the alleged breach stemmed. The investigator will endeavor to determine the nature of the breach and how it occurred. We may contact you during the process to seek any 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 endeavor to resolve all investigations within a reasonable time.

Please contact our Privacy Officer at:

Privacy Officer
The Jewellery Group Pty Limited
GPO Box 976
Adelaide SA 5001
Tel: 08 8228 4557
Fax: 08 8223 4153
Email: privacy@thejewellerygroup.com.au

SECURITY

We will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access, including by means of firewalls, password access, secure servers and encryption of data.

If you suspect any misuse or loss of, or unauthorised access to your personal information, please let us know immediately.

LINKS

Our websites may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible

for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time. Any updated versions of this Privacy Policy will be posted on our website. This Privacy Policy was last updated in December 2014.