

INSIDER™ Rewards Program | Privacy Notice

November 2017

Privacy Commitment

Total Tools Importing Pty Ltd ABN 18 084 220 342 and its related entities as defined in the Corporations Act 2001 (Cth) (“Total Tools”) respect the privacy of individuals and treat your Personal Information with respect and integrity. This privacy policy (“Privacy Policy”) sets out the way in which Total Tools collects and handles your Personal Information and complies with the Privacy Act 1988 (Cth).

1. Scope of Privacy Policy and Consent

This Privacy Notice contains important information about the privacy of **INSIDER™ Rewards** Members and communications sent by **INSIDER™ Rewards** and Total Tools Importing Pty Ltd ABN 18 084 220 342.

- (i) This Privacy Notice explains how Total Tools collects, uses, discloses and otherwise handles the personal information of **INSIDER™ Rewards Members**, and how we communicate with Members. Please note that we reserve our right to amend, remove or vary this policy from time to time without notice.
- (ii) The terms of this Privacy Notice form part of the Terms and Conditions of your **INSIDER™ Rewards Membership**. By registering as an **INSIDER™ Rewards Member** or by using your **INSIDER™ Rewards Membership** benefits, you agree to the terms of this Privacy Notice, as amended from time to time.
- (iii) This Privacy Notice is available on the **INSIDER™ Rewards** page at totaltools.com.au, or you can request a copy by contacting the **INSIDER™ Rewards** Customer Service Team.
- (iv) Terms not defined in this Privacy Policy have the same meaning given to those terms in the **INSIDER™ Rewards** Terms and Conditions.
- (v) Total Tool's main Privacy Policy which explains how Total Tools collects and handles other personal information can be found at www.totaltools.com.au. Information you provide to Total Tools may potentially be covered by both this Privacy Notice and the Total Tools Privacy Policy.

2. Collection of Personal Information | What we collect and how we collect it

Personal information includes information about an individual who is identified or reasonably identifiable. **INSIDER™ Rewards** Members can transact with Total Tools anonymously, by paying cash in-store for purchases and not identifying themselves as an **INSIDER™ Rewards Member**. You can also view the Total Tools website and make general phone queries without having to identify yourself, but if you would like to make specific enquiries about your membership we may not be able to assist you without identifying yourself. However, by doing any of the following you consent to the collection of your Personal Information by Total Tools in accordance with this Privacy Policy:

The personal information we collect about **INSIDER™ Rewards** Members includes:

- (i) When you join the **INSIDER™ Rewards** program, your name, address, email address, telephone numbers, date of birth, gender, company name and any other information you provide on the Application Form whether online, via the hardcopy form, in-store with a team member, via the **INSIDER™ Rewards** App or over the phone. Further, each **INSIDER™ Rewards Member** is assigned an **INSIDER™ Rewards Membership** number, which are used for identification purposes by Total Tools;

- (ii) When you shop with Total Tools using your **INSIDER™ Rewards** Member Number and transactional information, records of when and where you shopped, how you paid and what you purchased;
- (iii) If you install and use the **INSIDER™ Rewards App**, we may also collect information about your location (eg to locate the Total Tools store closest to you);
- (iv) After you shop we calculate and record the **INSIDER™ Points** you earned in your transactions, any **INSIDER™ Points** you redeemed and any rewards you have received;
- (v) If you enter a Total Tools or **INSIDER™ Rewards** promotion, the information you provide when submitting your entry (whether in hardcopy, online or via the **INSIDER™ Rewards App**);
- (vi) Australian Company Number and/or Australian Business Number (if required);
- (vii) Details of your orders; and
- (viii) If you send us an enquiry or provide us with feedback, your name, contact details, details of your enquiry or feedback and additional information about any response we provide, whether provided in hardcopy correspondence, via the online enquiry form or email, or over the phone

If you don't provide us with the information requested on the **INSIDER™ Rewards** Application Form, or agree to our subsequent collection of your personal information as outlined in this Privacy Notice, we may not be able to enrol you as a Member, and you will not earn **INSIDER™ Points**.

2.1 Collection of other personal information through the Total Tools website and INSIDER™ Rewards App

We collect information about **INSIDER™ Rewards** Members through the use of digital technologies like cookies. Cookies allow us to collect information (including anonymised information and personal information) based on your use of a device (such as computer or mobile phone or **INSIDER™ Rewards App**.) about your interactions with online content, and your interests and preferences. We use this information to personalise your interactions with us and to facilitate tailored advertising by Total Tools and trusted third parties. You may be able to disable such technologies if your browser settings allow for this.

The information is used and disclosed by Total Tools for purposes including statistical analysis and to assist Total Tools to improve the functionality and usability of the website and **INSIDER™ Rewards App**.

2.2 Sensitive information

Total Tools only collects sensitive information (eg health information) where it is reasonably necessary for our functions or activities and either you have consented, or we are required or authorised by law to do so.

2.3 Collection from others

You acknowledge that Total Tools may collect personal information about **INSIDER™ Rewards** Members from other persons or entities for the purposes of business, and consent to this practice. Such entities include our strategic partners and suppliers of publicly available information and digital services used by **INSIDER™ Rewards** Members (including social media platforms). At times, we combine different sets of data to add to the personal information we hold.

3. Use of Personal Information - Why we collect personal information

3.1 Main purposes

Total Tools uses personal information for the purpose for which it was specified or reasonably apparent at the time that personal information was collected. The main purposes for which we collect, hold, use and disclose personal information about INSIDER™ Rewards Members are set out below:

- (i) To enrol Members in the INSIDER™ Rewards Program
- (ii) To administer INSIDER™ Rewards Memberships, including administering your account and providing you with Progress Summaries
- (iii) To provide you with INSIDER™ Points and other INSIDER™ Rewards Benefits
- (iv) To contact and communicate to Members information about: the **INSIDER™ Rewards Program**, including **INSIDER™ Points** and information about our special deals and promotions, events, product launches, changes and other special offers and discounts
- (v) Performing research and statistical analysis, including for customer satisfaction and product and service improvement purposes. This may include matching information we collect against other information held by third parties. (We may also use and disclose de-identified data about **INSIDER™ Rewards Members** for these purposes)
- (vi) To help Total Tools tailor existing or develop new products, services or offers, and to help us selectively target promotional offers and opportunities
- (vii) Protecting the security of our stores, staff, customers, suppliers and merchandise (including theft and fraud prevention)
- (viii) Answering queries and resolving complaints
- (ix) General planning and administration purposes.

We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or which are required or authorised by or under law, and for which you have provided consent.

3.2 Direct marketing, research and opting out

By providing your address, email address and telephone numbers to Total Tools, you consent to Total Tools contacting you for the purposes set out above. We may send this information in a variety of ways, including by mail, email, social media, SMS, MMS, telephone and for those members who have downloaded it, the **INSIDER™ Rewards App**. You can opt out of being contacted by:

- (i) Following the relevant unsubscribe instructions contained in any electronic communications received from Total Tools including but not limited to email and SMS
- (ii) Sending a written request to the Privacy Officer, Total Tools Importing Pty Ltd, 20 Thackray Road, Port Melbourne, VIC 3207.
- (iii) Visiting a Total Tools store and notifying a member of staff - For individual store contact details please see <http://www.totaltools.com.au/store-finder/>

You can opt out of receiving notifications on the INSIDER™ Rewards App if you turn off Push Notifications in the settings.

If you opt out of being sent electronic correspondence, we may not be able to provide you with some of the main benefits of the **INSIDER™ Rewards** program.

Regardless of whether you opt out of any and/or all marketing communications, you consent to receiving necessary service based communications relating to your Membership and your account including, but not limited to, changes to these Terms and Conditions and/or our Privacy Notice, Total Tools Privacy Policy, account transactions or information relating to the purchase of products and services you have made.

3.3 Email and mobile communication

If you provide us with an email address or phone number, you consent to electronic communication such as notices or reminders being sent to you via that email address or phone number. Your email address must be unique, and for your security we recommend it is only accessible by you.

4. Disclosure of Personal Information - Who we may share your personal information with

We may share the personal information of Members with third parties where appropriate for the purposes set out above, including:

- (i) We may disclose information we hold to our directors, officers, employees and other Associated Entities within our group for business purposes, the purpose of operating a loyalty program and marketing or remarketing purposes through our websites, social media channels or other marketing mediums.
- (ii) Total Tool's contracted service providers or partners in connection with or for the purpose of Total Tools' business including: contractors, delivery and shipping providers, overseas and local agents, suppliers, information technology service providers, venues and event organisers, marketing and communications agencies, research and statistical analysis providers, call centres, hard copy and electronic mail houses, manufacturers and suppliers, external business advisers (such as recruitment advisors, auditors and lawyers).
- (iii) Regulatory, investigative or government bodies where such disclosure is required or authorised by law. We may ask one of these third parties to contact you directly for a specific purpose, and provide us with information collected from you in the course of providing the relevant products or services.
- (iv) We may disclose personal information to some of our Associated Entities overseas with whom we share personal information who may be located in places such as Japan, Singapore, Hong Kong, India, the Philippines, the United States of America and other countries or jurisdictions depending on the nature of the services those recipients provide to Total Tools (for example storing data via a cloud service, or where Total Tool's customer relationship management system is hosted on servers located overseas, or where delivery address information for online orders is managed via a third party located overseas). We will take reasonable steps to ensure recipients of this information do not breach Australian or New Zealand Privacy laws in relation to the personal information we disclose.

5. Data quality and security

5.1 General

- (i) We hold personal information in a number of ways, including in printed documents, electronic databases and email contact lists. Printed documents may be held at Total Tool's head office, Total Tools stores or secure offsite facilities.

- (ii) We use all reasonable efforts to safeguard and secure the information we collect to prevent unauthorised access or disclosure, misuse, interference, maintain data accuracy and ensure the appropriate use of information.
- (iii) We also take measures in respect of destroying or de-identifying personal information that is no longer needed for any lawful purpose.

5.2 Security

The steps we take to secure personal information include website protection measures, security restrictions on access to Total Tools computer systems, controlled access to Total Tools corporate premises, policies on document storage and security, personnel security and training and workplace policies.

While we endeavour to protect the personal information of users of our website and **INSIDER™ Rewards App**, no data transmission over the internet can be guaranteed to be 100% secure. As a result, while Total Tools strives to protect your Personal Information, Total Tools cannot ensure or warrant the security of any information you transmit to Total Tools over the internet, and you do so at your own risk.

Once Total Tools receives your transmission, Total Tools makes its best effort to try and ensure the information and Personal Information security both on Total Tools systems and while in transit between Total Tools' systems and the companies who provide Total Tools with the various systems.

If Total Tools becomes aware of an eligible data breach, Total Tools will assess whether the breach is likely to result in serious harm to the individual whose personal information has been compromised. If such assessment divulges that there was a data breach which is required to be reported under the Australian Privacy laws, Total Tools will accordingly report the breach to the Office of the Australian Information Commissioner and the individuals to whom the breach relates (where that individual's contact details are accurate).

If you are concerned about sending your information over the internet, you can contact Total Tools as set out in section 7. You can also help protect your personal information by keeping your account details confidential. If you become aware of any security breach, please let us know as soon as possible.

5.3 Third party sites

Links to third party sites that are not operated or controlled by Total Tools are provided for your convenience. Total Tools is not responsible for the privacy or security practices of those sites, which are not covered by this Privacy Notice. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

6. Access and correction

Subject to the Privacy Act 1988 (Cth), Total Tools provides you with access to your Personal Information upon your request.

Total Tools will take reasonable steps to ensure that your Personal Information is accurate, up to date and complete. However, Total Tools relies on you advising of any changes or inaccuracies of your Personal Information. Members can access, update or correct their **INSIDER™ Rewards** contact information by:

- (i) Accessing the **INSIDER™ Rewards** App and selecting 'My Profile' from the menu at the top right of the page
- (ii) Contact the **INSIDER™ Rewards** Customer Service Team at insider@totaltools.com.au. We may ask you to verify your identity first.
- (iii) Visiting a Total Tools store - For individual store contact details please see <http://www.totaltools.com.au/store-finder/>

7. Complaints or Questions

If you would like more information about how we manage your personal information, or if you have any further queries, or wish to lodge a complaint in relation to an alleged breach of the Privacy Policy or the Privacy Act 1988 (Cth) by Total Tools, please contact our Privacy Officer at Privacy Officer, Total Tools Importing Pty Ltd, 20 Thackray Road, Port Melbourne, VIC 3207.

All complaints received by the Privacy Officer will be dealt with fairly and in a timely manner considering all the circumstances of the complaint. In most cases, we expect that complaints will be investigated and a response provided within 30 days of receipt of the complaint. If the matter is more complex and our investigation may take longer, we will contact you and tell you when we expect to provide our response.

Should you not be satisfied with the way your complaint was handled or determined, you may contact Total Tools or, alternatively, contact the Australian Information Commissioner via www.oaic.gov.au.

8. Changes to this Privacy Notice

Total Tools may amend this Privacy Notice from time to time. The current version will be posted on the **INSIDER™ Rewards** page on the totaltools.com.au website and a copy may be obtained by contacting the **INSIDER™ Rewards** Customer Service Centre at insider@totaltools.com.au.

If you do not agree with any change to this Privacy Notice, you have the right to terminate participation in the **INSIDER™ Rewards** program in accordance with clause 11.3 of the **INSIDER™ Rewards** program Terms and Conditions.