

## Privacy Policy

We acknowledge and respect your privacy, and are committed to protecting your personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable). We are bound by the Australia Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**). This Privacy Policy explains how we manage your personal information, including our obligations and your rights in respect of our dealings with your personal information.

Please take a moment to read our Privacy Policy as it describes what happens to your personal information that is collected via our websites including those located at [unicharmhealthcare.com.au](http://unicharmhealthcare.com.au) (**Websites**).

### 1. Who are we?

Unicharm Australasia Pty Ltd ACN 006 884 546 (**we, us, our, or UcA**) is an Australian company providing personal care, healthcare and pet care products. We are situated in Mentone in South East Melbourne, Victoria.

### 2. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- (a) when you make an inquiry or order in relation to goods or services to us, including through one of our Websites;
- (b) when you apply for employment with us;
- (c) when you enter a promotion or claiming an offer we are running;
- (d) when you participate in a loyalty program;
- (e) when you subscribe to our mailing list;
- (f) when you make an application for a trade account;
- (g) in administering and performing any contracts with service providers;
- (h) when you contact us via telephone or facsimile;
- (i) from correspondence (whether in writing or electronically);
- (j) through any mobile applications provided by our organisation;
- (k) while conducting customer satisfaction and market research surveys;

- (l) when administering any of our services; and
- (m) as otherwise required to manage our business.

In certain cases we may collect personal information from publically available sources and third parties, such as suppliers, recruitment agencies, contractors, our clients and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to, correct and update the information.

### **3. Types of personal information we collect**

The type of personal information we may collect can include (but is not limited to), your name, postal address, email address, phone numbers, billing information and, if applicable, employment information.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services.

### **4. How we handle personal information**

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use and disclose personal information to:

- (a) offer and provide you with our goods and services;
- (b) manage and administer those goods and services, including account keeping procedures;
- (c) communicate with you, including (but not limited to), emailing you tax invoices, dispatch and tracking information, returns and exchange authorisations;
- (d) comply with our legal and regulatory obligations;
- (e) better understand your needs and how we can improve our products and services; and
- (f) otherwise to manage our business.

We will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure.

We may disclose personal information between our organisations or to third parties such as our suppliers, organisations that provide us with technical and support services, or our professional advisors, where permitted by the Privacy Act. If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

## **5. Protection of personal information**

We take reasonable steps to ensure that the personal information we collect is accurate, complete and up-to-date.

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

## **6. Direct marketing**

Like most businesses, marketing is important to our continued success. We therefore like to stay in touch with customers and let them know about new opportunities. We may provide you with information about new products, services and promotions either from us, or from third parties which may be of interest to you.

We will not disclose your personal information to third parties for marketing purposes without your consent.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer.

## **7. Information automatically collected by our Websites**

Each time you visit our Websites, our server may collect some anonymous information, known as click-stream data, including: the type of browser and system you are using; the address of the site you have come from and move to after your visit; the date and time of your visit; and your server's IP address.

We also use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing our Websites. A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

We may collect this information for statistical purposes to find out how the Site is used and navigated, including the number of hits, the frequency and duration of visits or most popular session

times. We may use this information to evaluate and improve the performance of our Websites and help us to adapt the Websites to suit personal requirements.

## **8. Accessing and correcting your personal information**

You may contact our Privacy Officer to request access to the personal information we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you access to any of the personal information we hold about you.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

## **9. Overseas transfers of personal information**

We may disclose personal information between our related bodies corporate, where permitted under the Privacy Act. We therefore may disclose personal information to our associated entities around the world.

From time to time we may engage an overseas recipient to provide services to us, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider.

If we propose to disclose personal information to other overseas recipients, we will do so in compliance with the requirements of the Privacy Act and, where practicable, will advise you of the countries in which any overseas recipients are likely to be located.

By providing your personal information to us, you consent to us disclosing your personal information to any such overseas recipients for purposes necessary or useful in the course of operating our business, and agree that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the Australian Privacy Principles, that entity will not be bound by, and you will not be able seek redress under, the Privacy Act.

If you do not want us to disclose your information to overseas recipients, please let us know.

## **10. Resolving privacy concerns**

If you have any questions, concerns or complaints about this Privacy Policy or how we handle your personal information, please contact our Privacy Officer:

The Privacy Officer  
Unicharm Australasia Pty Ltd  
1 Hargrave Place  
Mentone VIC 3194  
Telephone: 9552 1222

We take all complaints seriously, and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001  
Telephone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

#### **11. Changes to this Privacy Policy**

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Websites.

The last update to this document was 6 May2019.