



## OUR PRIVACY POLICY

### Overview

This document is the Australian privacy policy of GlassDunes Australia Pty Ltd listed below (**GlassDunes Australia, we, us or our**).

We are bound by the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**). This policy explains how and why we collect, use, hold and disclose personal information about you.

The GlassDunes Australia that this privacy policy applies to:

- GlassDunes Australia (ABN 30 984 251 324);

In this privacy policy, personal information is the definition as outlined in the Privacy Act. (**Personal Information**).

This privacy policy relates to the Personal Information that we collect about our customers, visitors to our websites, users of our apps, anyone who interacts with us on social media and members of the public.

### Personal Information we collect and hold

In order to provide our products or services to you, we collect Personal Information about you and your interactions with us. The Personal Information we collect about you such as when you purchase any of our products, when you call us or if you visit one of our Brands' websites.

Personal Information we may collect about you includes:

- your name, Gender, address, telephone number, email address and date of birth;
- your transaction history and details of any enquiries or complaints you have made;
- if you purchase a gift card from one of our Brands, your gift card 'card number' and corresponding PIN, the balance on the gift card and its transaction history; and

- when you visit one of our Brands' website, details of the website you last browsed that linked you to our website (such as a search engine), the specific pages on our website that you have visited and technical data such as the type of device you are using to access the website.

Generally, you have no obligation to provide any information requested by GlassDunes Australia. If you choose to not to provide any requested information, then we may not be able to provide you with the product, service or information you are seeking that may depend on the collection of that information, particularly if the collection of that information is required by law.

### **How we may collect Personal Information**

The circumstances in which we collect Personal Information are, when you make an in-store or online purchase, put goods on hold, use our lay-by service, provide details to join our mailing lists or databases, provide information via social media pages, enter a competition, sign up to one of our Brands' VIP programs or loyalty programs, send us an enquiry or provide us with feedback.

### **Collection of Personal Information through Websites, Social Media and Apps**

Information is automatically collected through your use of our Brands' websites, websites of other members of GlassDunes Australia, social media and apps, through cookies or by other electronic means. Cookies are small text files that websites or apps may place on your computer or device and are used to recognise repeat users of websites and remember user preferences.

We may collect this information both anonymously and in relation to personal user accounts. Cookies may also be used to allow the website to track usage behaviour and aggregate data to allow GlassDunes Australia to customise a user's experience on their websites. This information is used and disclosed by GlassDunes Australia for purposes including statistical analysis, and to assist GlassDunes Australia to improve the functionality and usability of our websites and our apps.

### **Why we collect your Personal Information**

The main purposes for which personal information is collected or used are to:

- deliver any of The GlassDunes Australia's loyalty programs, VIP programs and customer relationship management systems;
- create and fulfil orders;
- answer queries, resolve complaints and respond on social media;
- provide you with the products, services and information you have requested from us;

- promote GlassDunes Australia, our Brands and our products and services, including through direct marketing, events and competitions, public relations and social media;
- perform research and statistical analysis;
- help us tailor existing or develop new products, services or offers;
- protect the security of our stores, team members, customers, suppliers and merchandise (including fraud prevention); and
- comply with applicable requirements under law or regulations, or for other purposes explained at the time of collection.

### **Direct marketing and opting out**

To be added to our email list, you will need to 'opt in' to this and provide your email address and contact details to GlassDunes Australia.

You can opt out from receiving our marketing communications at any time by:

- using the unsubscribe facility that we include in our email messages to opt out of receiving those messages;
- by emailing the Privacy Officer for The Sussan Group Sharing of Personal Information [privacy@glassdunes.com](mailto:privacy@glassdunes.com)

Where required by law, we may disclose your Personal Information to other entities within GlassDunes Australia and to third parties where relevant for the purposes set out above, including to:

- financial institutions for payment processing;
- regulatory, investigative or government bodies to comply with laws and regulations; and
- our contracted service providers or partners, including overseas and local agents, delivery and shipping providers, information technology service providers, marketing and communications agencies, research and statistical analysis providers, hard copy and electronic mail houses, manufacturers, suppliers and external business advisers (including our accountants, auditors and lawyers).

We may also disclose your Personal Information to others outside of GlassDunes Australia where:

- we are required or authorised to do so by law;
- the disclosure is for a related purpose that would be consistent with your reasonable expectations based on any other purposes we have notified you of, including at the time of collecting your Personal Information;

- you have expressly consented to the disclosure or your consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

### **Electronic or Digital Gift Cards**

If you purchase an electronic or digital gift card for one of our Brands and you request that the gift card be sent to a third party's email address, then you must ensure that you have obtained that third party's consent for us to do this beforehand (and we may ask you for evidence of that consent).

### **Overseas disclosure**

Where required by law, we may disclose your Personal Information to third parties and service providers located overseas in connection with the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your Personal Information do not breach applicable privacy obligations relating to your Personal Information.

Overseas recipients providing services to GlassDunes Australia may be located in, or may store your Personal Information in, Germany, USA, Singapore and such other countries we may notify you of from time to time.

We may also disclose your Personal Information to third parties in each overseas country which you nominate as a delivery address for delivery and order fulfilment (if not within Australia), when you order products from our online store and require delivery to an address in a foreign country. We currently offer international delivery of orders in New Zealand, USA, United Kingdom, Ireland, Singapore, Canada, Hong Kong, United Arab Emirates, Fiji, Papua New Guinea, Japan, South Africa, Spain, Italy, France, Germany, Netherlands, Philippines, Norfolk Island, and any other country that we may specify on any of our Brands' websites from time to time.

### **Access to, and correction of, Personal Information**

You have the right to request access to, or a copy of, the Personal Information that we hold about you. We will provide you with access to your Personal Information within 30 days of receiving your request, subject to some exceptions permitted by law. We will provide access in the manner that you have requested provided it is reasonable and practicable for us to do so. There is no charge for requesting access to your Personal Information, but we may charge you a fee to cover our reasonable costs of locating the information and providing it to you.

We take all reasonable steps to ensure that all Personal Information that we hold about you is as accurate as is possible. You are able to contact us at any time and ask for Personal Information that we hold about you to be corrected if you feel the information we have about you is inaccurate, incomplete, out of date, irrelevant or misleading. Our contact details are set out below.

Where you ask us to correct Personal Information that we hold about you, or if we are satisfied that the Personal Information we hold is inaccurate, out of date, incomplete, or irrelevant, we will take reasonable steps to correct that information to ensure that the information is accurate, up-to-date, and not misleading. If we correct your Personal Information, and we have previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask us to notify that other entity. If so, we will take reasonable steps to do so, unless this would be impracticable or unlawful.

## **Security of and how we store and hold Personal Information**

We take measures to ensure your Personal Information is protected from unauthorised access, loss, misuse, disclosure or alteration. This includes protection measures, security restrictions on access to our computer systems, controlled access to our corporate premises, policies on document storage and security and workplace policies.

We endeavour to protect the Personal Information of users of our website, but we cannot guarantee the security of information you disclose online - you disclose that information at your own risk.

If you are concerned about sending your information over the internet, you can contact the Privacy Officer [privacy@glassdunes.com](mailto:privacy@glassdunes.com) If you become aware of any security breach, please let us know as soon as possible.

## **Complaints**

If you think we have breached your privacy or if you have a complaint about the way we have handled a privacy issue (including how we have responded to your request for access or correction of your Personal Information), you have a right to make a complaint. Our contact details for making such a complaint are set out below.

We will consider your complaint and determine whether it requires further investigation. All complaints received by the Privacy Officer will be handled in a fair, confidential, and timely manner.

We will respond to you by your preferred contact method, if you have indicated one, to notify you of the outcome of our investigation within a reasonable time and in any event within 30 days of us receiving your complaint.

If you are unsatisfied with the way we have handled a privacy issue or your complaint, you can make a further complaint to the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)).

## **Contacting Us**

Please contact our Privacy Officer [privacy@glassdunes.com](mailto:privacy@glassdunes.com)

If you would like to access or correct the Personal Information that we hold about you. We may ask you to verify your identity before processing any access or correction requests to ensure that the Personal Information we hold about you is properly protected.

If you have any questions, comments, concerns in relation to our privacy policy, please contact us by contacting the Privacy Office [privacy@glassdunes.com](mailto:privacy@glassdunes.com)

For any other general enquiries, please contact our customer support team by email to [privacy@glassdunes.com](mailto:privacy@glassdunes.com)

### **Further information**

Further information about the Privacy Act and the Australian Privacy Principles is available from the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au) or on 1300 363 992.

### **Amendments to the Privacy Policy**

We may amend our Privacy Policy from time to time. The current version will be published on our website. This privacy policy was last updated on 8th October 2024