

## **Woolworths Group Privacy Policy**

As we value the trust of our customers and take the protection of their personal information seriously, we encourage customers to read and make sure they understand the updated Privacy policy. If there are any questions regarding its contents, we invite customers to contact our Privacy team, whose contact details are contained in the updated policy.

### **1. Respecting your privacy**

Woolworths Group (including Woolworths Group Limited ABN 88 000 014 675 and its related bodies corporate) is committed to compliance with privacy laws which apply to its businesses and which set out standards for the management of personal information. This policy outlines our personal information management practices.

Specifically:

- The kinds of personal information we collect and hold;
- How we collect and hold it;
- The purposes for which we collect, hold, use and disclose it;
- Your right to access and seek correction of it;
- How you may complain about privacy matters; and
- Our sharing of your personal information overseas.

There are some matters to which this policy does not apply. These are referred to below (see clause 9 below).

## **2. What kinds of personal information do we collect and hold?**

The personal information we collect and hold is what is reasonably necessary for our business functions and activities. When we collect and hold personal information, it is of the following kinds:

- Your personal details such as your name, addresses, telephone numbers, age and gender;
- Your customer reference number or loyalty card number;
- Whether you have taken up some of our other offerings, such as membership of our clubs and loyalty programs, our financial services products and our mobile applications;
- Any rewards and redemption details applicable to your membership of our loyalty programs; and
- Whether you have a connection with others whose personal information we may collect or hold, for example family members who may be linked to your loyalty program membership;
- What, how and when you buy from us or have expressed an interest in buying from us; and
- Your stated or likely preferences, for example whether you may be interested in particular products or promotions.

Some of our products and services require us to collect health information from you, for example our optical or insurance services. We also collect health information from you for the purpose of determining any public liability issues involving you. This information is only used to provide you with those services or to manage such issues.

Depending on the nature of your dealings with us, we may collect and hold other types of personal information. For example, information collected and

held via our secure financial systems about the debit or credit card you might use for your purchases from us.

You generally have the option of not identifying yourself or of using a pseudonym when dealing with us. But not where this is impractical (for example when you shop online with us) or where the law or a court order provides otherwise.

### **3. How do we collect and hold personal information?**

Collection of personal information: When we collect personal information about you, we do so by making a record of it.

We do this when:

- You register with us, for example to create an account, to become a member of one of our clubs or loyalty programs or to send you information;
- You communicate with us online;
- You take part in our promotions, competitions, testimonials, surveys and focus groups;
- You deal with us in other ways involving a need for personal information to be provided such as when you make a lay-by, contact one of our call centres or bring a claim against us.

We may also collect personal information about you by accessing data from other sources and then analysing that data together with the information we already hold about you in order to learn more about your likely preferences and interests. When you visit our websites, social media pages or mobile applications or click on our advertisements on the online

media of other companies, we may collect information about you using technology which is not apparent to you, for example “cookies”.

For information about our use of this technology, click on this [link to view our Cookie Statement](#).

Most of the personal information we collect and hold about you is from your direct dealings with us. We may sometimes collect your personal information other than from you directly. For example from other suppliers who, in common with us, have a relationship with you.

Personal information we hold is generally stored in computer systems. These may be operated by us or by our service providers. In all cases, we have rigorous information security requirements aimed at eliminating risks of unauthorised access to, and loss, misuse or wrongful alteration of, personal information.

#### **4. Why do we collect, hold, use and disclose personal information?**

When we collect, hold and use your personal information, we do so primarily to sell and promote goods and services to you and to improve on the range of our offerings. For example:

- To learn of your likely preferences so that we may promote goods and services to you in a way which may be of most interest to you. This includes the products and services of our suppliers and other trusted partners who offer products and services that may be of interest to you; and

- To assist in investigating your complaints and enquiries.
- We disclose personal information we collect for purposes which are incidental to the sale and promotion of our goods and services to you. For example, we may disclose your personal information within our group, to service providers who assist us in our day-to-day business operations and as part of buying or selling businesses.

We may collect, hold, use and disclose your personal information for other purposes which are within reasonable expectations or where permitted by law. You may opt out of our direct marketing to you. Our direct marketing materials will tell you how to do this.

We may anonymise and aggregate your personal information. We may do this for use and disclosure of the anonymous data to determine preferences and shopping patterns. We share this anonymised data with our trusted partners to assist them in marketing products and services to you that are likely to be relevant to your interests and preferences.

## **5. How can you enquire about, access and correct your personal information?**

Access to personal information: We will provide you with access to any of your personal information we hold (except in limited circumstances recognised by law). If you wish to access your personal information or have an enquiry about privacy, please contact our Privacy Officer at: [privacy@woolworths.com.au](mailto:privacy@woolworths.com.au) or by calling us on 1300 908 631.

Alternatively, you can write to us at:

Privacy Officer

Woolworths Group Limited

PO Box 8000

BAULKHAM HILLS NSW 2153

Before we provide you with access to your personal information we may require some proof of identity. We may charge a reasonable fee for giving access to your personal information if your request requires substantial effort on our part.

Correction of personal information: If you need to correct your personal information, please contact our Privacy Officer at one of the above contact points.

## **6. How can you complain about our management of personal information?**

If you wish to complain about a breach of the privacy rules that bind us, you may contact our Privacy Officer at one of the above contact points. We may ask you to put your complaint in writing and to provide details about it. We may discuss your complaint with our personnel and our service providers and others as appropriate.

Our Privacy Officer will investigate the matter and attempt to resolve it in a timely way. Our Privacy Officer will inform you in writing about the outcome of the investigation. If our Privacy Officer does not resolve your complaint to your satisfaction and no other complaint resolution procedures are agreed or required by law, our Privacy Officer will inform you that your complaint may be referred to the Privacy Commissioner for further investigation and will provide you with the Commissioner's contact details.

## **7. Our sharing of your personal information overseas**

It is our policy to require all of our overseas sharing of personal information to be done in a way which requires observance of strict privacy and security standards, both during transit and at the overseas destination. We may allow your personal information to be shared with those who are in countries other than your own location. We do this:

- Where we have made a business decision to store our data with a trusted service provider who is in the business of providing data storage and processing services. Examples are those who store and process our email and mobile application data. These services commonly involve diverse geographic locations which change from time to time for reasons which include data protection and processing efficiency. Where these services are used by us, it is not practical for us to notify you of which country your personal information may be located in;
- For disclosures between our group companies. Our main business locations are in Australia and New Zealand, but some of our group companies may be based in other countries from time to time.
- When our business which collected your personal information is in a different country to your location;
- When our supply to you necessarily involves overseas disclosures. For example a reinsurer of some of our insurance offerings uses

computer systems in Switzerland and the United States to store insurance-related personal information;

- Where you are involved with public liability issues concerning a product we may disclose your personal information to any overseas supplier of such a product in the course of managing those issues.

## **8. Updates**

This privacy policy is current at the date below. We may change it periodically. If we propose to change this policy, we will display at least 2 weeks' prior notice of the change on [www.woolworthsgroup.com.au](http://www.woolworthsgroup.com.au) .

## **9. Other privacy terms and limits of this policy**

This is a policy. There may be additional privacy notices and terms relevant to you depending on the nature of your dealings with us and on our particular businesses. There are additional privacy terms in our loyalty program and club membership contracts and for use of our online sites, for example. We have separate charters concerning our employees – this policy does not apply to the personal information of our employees in their capacity as such.

## **10. More information**

More information about privacy law and privacy principles is available from the Privacy Commissioner. The Privacy Commissioner may be contacted at [www.oaic.gov.au](http://www.oaic.gov.au) (email- [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) ) (Australia)

Last update of this policy: January 2018