



## Snap-on Tools (New Zealand) Privacy Policy

Snap-on Tools (New Zealand) Limited (company number 4387902) (Snap-on, we or our) is committed to providing you with the best possible customer service. We are bound by, and respect the rights of individuals relating to their personal information under the Privacy Act 2020. This document is our Privacy Policy and explains how we collect and manage your personal information.

By using our website, using our services, buying our products or by providing any personal information to us, you confirm that you:

- Accept the terms of this privacy policy with regard to how we collect, manage, store, and agree to our, use and distribute your personal information; and
- are not a child or a young person under the age of 18 years. Our website, services, and products are not intended for children and young persons under the age of 18 years and we do not knowingly collect data relating to children and young persons.

### What is personal information?

When used in this Privacy Policy, the term “personal information” has the meaning given to that term in the Privacy Act. In general terms, it is any information that can be used to personally identify you. Examples of personal information include names, addresses, email addresses and telephone numbers. 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 about you:

- a unique username and password;
- name;
- mailing, email or street address;
- telephone number;
- profession, occupation or job title;
- age or date of birth;
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- information you provide to us through our service centre, customer surveys or visits by our representatives from time to time.

You are responsible for ensuring that all information you provide us is complete and accurate. Unless required to, we will not verify that the information you have provided is complete and accurate. However, if we believe that the information you provide is not complete or accurate, we reserve the right to decline access to information or services until complete and accurate information is provided.

### How do we collect and hold your personal information?

Generally we collect your personal information directly from you unless it is unreasonable or impracticable to do so.

We may collect personal information from you in various ways, including when you:

- access or use our website;

- register your details on our website;
- have conversations with us and our representatives;
- complete an application or purchaser order;
- order products from us;
- contact us for information;
- participate in surveys or research;
- enter a promotion;
- subscribe to our mailing lists;
- apply for a franchise ; or
- submit a job application or accept employment with us.

We may also collect personal information from the following:

- third party companies such as credit reporting bodies, law enforcement agencies and other government entities;
- our related bodies corporate; and
- Snap-on franchisees, dealers and distributors.

If we need to collect your personal information from any other third party, we will discuss this with you.

We may hold your personal information in either electronic or hard copy form.

### **For what purposes do we collect, hold, use and disclose your personal information?**

We collect personal information about you so that we can perform our business activities and functions and provide the best quality of customer service to you.

We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you;
- to answer enquiries and provide information or advice about existing and new products or services;
- to provide you with access to protected areas of our website;
- to keep you up-to-date with products, services, events and promotions that may be of particular interest to you;
- to conduct business processing functions, including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for training, employment or employment application purposes;
- for planning, product development or research purposes;
- to update our records and keep your contact details up to date;
- to send communications requested by you;
- to process and respond to any complaint made by you;
- to assess the performance of, our and to improve the performance of our website;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of Snap-on Tools (New Zealand), its related bodies corporate, contractors or service providers;
- to comply with any applicable law, rule or regulation or in co-operation with any governmental authority of any country (or political sub-division of a country); and
- if we supply products or services on credit or provide finance to you or your company, for debt collection purposes and to assess credit-worthiness in accordance with our Credit Policy set out below.

## **To whom may we disclose your personal information**

We may disclose your personal information to:

- third party service providers and suppliers for business, marketing and related purposes;
- any organisation for any authorised purpose with your express consent; and
- our employees, Snap-on franchisees, dealers and distributors, related bodies corporate, contractors, service providers and other third parties for the purposes of operating our website or our business, fulfilling requests by you, and to otherwise provide products and services to you. The third parties that we may disclose your personal information to include, without limitation, web hosting providers, IT Systems administrators, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants and where we supply products or services to you on credit or provide finance to you, to credit reporting bodies.

We may occasionally hire other companies to provide services on our behalf, including but not limited to processing transactions and customer freight shipping. Those companies will most likely be located in New Zealand and Australia and will only receive from us the personal information they need to deliver their services to you on our behalf.

## **Do we disclose your personal information to anyone outside New Zealand?**

We may disclose your personal information for some of the purposes listed above to entities located outside of New Zealand including to:

- our related bodies corporate, primarily located in the United States of America and Australia;
- our data hosting and other IT service providers, primarily located in the United States of America and Australia; and
- other third parties which are likely to be located in the United States of America and Australia.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

Depending on the third party, some levels of personal information may be disclosed to third parties in countries outside New Zealand and steps are taken to reasonably ensure it has similar levels of data protection. If the third party is not in a country with similar levels of data protection, this will be made known to you and we will only share the required personal information necessary for the purposes of the performance of our services upon receipt of your authorisation.

## **What happens if we can't collect your personal information?**

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

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- you may not be able to access certain sections of our website
- we may not be able to provide you with information about products or services that you may want, including information about discounts, sales or special promotions; or
- 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.

## **Our website and cookies**

This privacy policy also applies when using our website. For each visitor to reach the website, we collect (through the use of a "cookie" as described below) the following non-personally identifiable information including but not limited to: browser type, version and language; operating system; pages viewed while browsing the website; page access times; and referring website address. 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 recognise your computer and collect some of the information referred to above. This collected information is used solely internally for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are at the website.

You have the ability to disable cookies (for all sites) from within your browser settings and you can control the extent to which your device allows cookies. You can do this by changing the settings on the browser software that your device uses to access the internet.

### **Links on website**

Our website 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.

### **Security**

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. Personal information is destroyed or de-identified when no longer needed or where we are no longer required by law to retain it (whichever is the later).

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Any credit card details used to make a payment to us are securely transmitted to our bank where the transaction will either be accepted or declined. We only store a payment authorisation reference number associated with your transaction(s) for the purposes of keeping track of payments to us but we do not store your credit card details. The reference cannot be used for any other purpose other than noting the fact that you conducted a credit card transaction with us.

### **Direct marketing materials**

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws. If you indicate a preference for a method of communication, we will endeavour 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 (see details below) or using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

### **How can you access and correct your personal information?**

Your information is held at, and can be accessed by writing to:

- Snap-on Privacy Manager, [sota.privacyofficer@snapon.com](mailto:sota.privacyofficer@snapon.com) or at the address at the end of this policy.

We also utilise the services of third party IT, cloud storage, system, and email providers which may change from time to time. If you would like to know who we use and where your information is stored, please get in touch with us and we will use reasonable endeavours to provide that information to you.

You have the right to access your personal information, subject to exceptions allowed by law. If you would like to do so please advise us. You may be required to put your request in writing for security reasons.

You may request information we hold about you at any time by contacting us (see 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).

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 that we correct it. We will consider if the information requires correction. If we do not agree that there are grounds for amendment then you may request that we add a note to the personal information stating that you disagree with it.

### **What is the process for complaining about a possible breach of privacy? How we will deal with complaints?**

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it.

We will treat your requests or complaints confidentially and our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

If you are not satisfied with our handling of your complaint or our proposed resolution, you have a right to lodge a further complaint with the Office of the Privacy Commissioner. You can find more information about the Privacy Commissioner and their complaints procedure at <http://privacy.org.nz>.

### **Changes to this Privacy Policy**

We reserve our right to make amendments to this Privacy Policy at any time for any reason, including in order to comply with any future amendments to the Privacy Act. If you have objections to the Privacy Policy, you should not access or use our Website. Any updated versions of this privacy policy will be effective from the date of posting on our website.

This privacy policy was last updated on 15th September 2021.

### **Contacting us**

We welcome your comments regarding this Privacy Policy. If you have any questions about our Privacy Policy, any concerns or a complaint regarding the treatment of your privacy, please use the contact link on our website or contact us using the contact details set below.

Please contact us during business hours Monday to Friday NZST:

Privacy Officer

Snap-on Tools (New Zealand) Limited

Tel: +61 2 9837 9100

Email: [sota.privacyofficer@snapon.com](mailto:sota.privacyofficer@snapon.com)

Address: 80 Holbeche Rd  
Arndell Park  
Australia 2148