

HG Group Ltd and its subsidiaries (Attach2 Ltd, Attach2 Pty Ltd and Equip2 Ltd) are suppliers of heavy equipment for the construction industry throughout Australia and New Zealand.

## Privacy Policy

HG Group and its subsidiaries complies with the New Zealand Privacy Act 2020 and the Australian Privacy Act 1988 when dealing with Personal Information.

Personal Information is information about an identifiable individual (a natural person). HG Group is committed to providing quality services to you and this policy outlines ongoing obligations to you in respect of how we manage your Personal Information. This Privacy Policy governs the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

If you wish to seek further information regarding the New Zealand Privacy Act, see [www.privacy.org.nz](http://www.privacy.org.nz). A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.aaic.gov.au](http://www.aaic.gov.au).

## Collecting Personal Information

HG Group collects personal information that is reasonably necessary for or directly related to the conduct of its business relationship with you. Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.

Examples of Personal Information we collect include but are not limited to:

- Names
- Addresses
- Email addresses
- Phone numbers
- IP address
- Credit/financial information
- Web and social interactions with HG Group content.

The primary purpose of collecting your Personal Information is identity verification, credit reference checking, providing services to you and providing information for marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

Personal Information is obtained in many ways, including but not limited to:

- Directly from you via, Telephone, Email or by filling out a form
- From our records of your interactions with our company for example purchasing of our products
- From information we receive from credit reporting agencies or credit checks
- From your website usage
- Other publicly available sources or from third parties.

You may unsubscribe from our mailing/marketing lists at any time by following the unsubscribe link on the emails, or by contacting us directly – see contact details on [HG Group \(hggrouppltd.com\)](http://hggrouppltd.com)

You are not required by law to provide us with any personal information. Where possible, we will allow you to interact with us anonymously or using a pseudonym. For example, if you contact us with a general enquiry, we will not ask for your name unless we need it to adequately handle your enquiry. However, if you do not provide us with sufficient personal information, we may be unable to provide you with any of our products or services.

From time-to-time HG Group may take videos and photographs of goods it has supplied to various customer sites. Some videos and photographs may include images of people. If any person objects to their image appearing in a photograph or video, HG Group will take steps to remove that person's image from such photographs and videos.

## Purpose for collection Personal Information

HG Group, in some cases uses technology such as machine learning to help us give the best experience to our customers.

In general, HG Group uses personal information for the following purposes:

- Providing products or services that have been requested.
- Providing you with information such as a quotation or respond to an enquiry by you or to arrange for the delivery of products that you require.
- Administering and managing sale transactions including but not limited to invoicing and collecting debts.
- Assessing the eligibility of a guarantor under an application for credit.
- Managing and enhancing its products and services, including analysing customer feedback and future customer needs.
- To improve the quality of your visit to our website.
- To conduct marketing activities.
- Complying with regulatory and legal obligations.
- Supplying you with information about its products.
- Recruiting employees or contractors.
- Fulfilling its obligations to employees.
- A purpose required or permitted by law
- Other reasonable purposes

## Sensitive Information

Sensitive information is defined as information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record, or health information.

Sensitive information will be used by us only for the primary purpose for which it was obtained, for any secondary purpose that is directly related to the primary purpose and with your consent; or where required or authorised by law.

## Third Parties

Where reasonable and practicable to do so, we will collect Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

We do not guarantee website links or policy of third parties.

## Disclosure of Personal Information

HG Group Ltd may disclose your personal information to other companies in the HG Group group of companies for our own business purposes. We may also disclose personal information to other organisations for example to:

- Organization you have provided consent to
- Your employer
- Our professional advisers including accountants, auditors, and solicitors
- Third party contractors, who help conduct our business.
- Government or regulatory authorities where required or permitted by law.

A business that supports our services and products may be located inside New Zealand or Australia. This may mean your Personal Information may be held and processed across overseas borders, for example, cloud storage and overseas subsidiary entities.

HG Group will take all reasonable steps to ensure that any third-party organisations are bound by confidentiality and privacy obligations with respect to your personal information.

Under no circumstances will HG Group sell customer personal information without the written consent of the person to whom it relates.

## Security of Personal Information

HG Group holds your personal information in electronic files. HG Group takes all reasonable steps to ensure that your personal information which is kept in its files is protected from misuse, interference, loss, unauthorised access, modification, and disclosure. HG Group takes all reasonable steps to protect personal information from unauthorised access or disclosure. HG Group continues to implement and maintain security controls within the organisation. These controls may include storing sensitive data where applicable behind a secure firewall where data is encrypted. We may also implement multi authentication to systems that have been flagged as storing sensitive data.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. Personal Information will not be kept for longer than is required or for the purpose it may lawfully be used.

## Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete, and up to date. If you find that our information is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

## Access to and updating your Personal Information

We will make every effort to keep any personal information held complete, up to date and accurate. You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access, update or correct your Personal Information, please contact us in writing - see contact details on [HG Group \(hggroupltd.com\)](http://HG Group (hggroupltd.com))

HG Group will not charge any fee for you to access your data. In order to protect your Personal Information, we may require identification before releasing any requested information.

## Marketing

HG Group may send marketing materials to its customers or potential customers where HG Group has collected the personal information from the individual and the individual would reasonably expect HG Group to use the information for that purpose.

By using HG Groups website's, you agree to the collection and use of information in accordance with the following.

We may use the information we collect from you when you register/create an account, sign up for our newsletter, respond to a marketing communication, make a purchase, or use certain website features, in the following ways:

- To personalise online experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To improve our website in order to better serve you.
- To send periodic emails regarding your order or other products and services.

If a customer no longer wishes HG Group to use their personal information in order for HG Group to provide marketing materials, the customer is to advise HG Group via the relevant method provided for in the electronic marketing message sent to the customer (e.g. via an 'unsubscribe' link). HG Group will act and amend its records promptly.

## Our Website

Like many businesses, we collect information that your browser sends whenever you visit our website. This data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, and the pages of our site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In using our websites, your personal information may be collected through the use of cookies. These are small text files placed on your mobile device or computer by our websites which automatically collect information about you without you providing that information to us directly. Most browsers are set by default to accept cookies. However, if you do not wish to receive any cookies you may set your browser to either prompt you whether you wish to accept cookies on a particular site, or by default reject cookies. Please note that rejecting cookies may mean that some or all of the functions on our website will not be available to you.

Sometimes our websites contain links to other websites. When you access a website other than our websites, we are not responsible for the privacy practices of that site. We recommend that you review the privacy policies of each website you visit.

In addition, we may use third-party services such as Google Analytics that collect, monitor and analyse data.

HG Group is also present on social media sites such as Facebook, YouTube, Instagram and LinkedIn. It is important to note that if you “follow” us, “like” our content or “share” any information, you will be covered by the respective social media site’s privacy policy and not our own.

HG Group has no control over the information you give when visiting third party websites that are not governed by this Privacy Policy. We recommend you refer to the privacy policy applicable to each website you visit.

## Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy or the way in which HG Group has handled an individual’s personal information, please contact us by writing at:

PO Box 905, Masterton 5840 New Zealand

Email: [admin@hggroupltd.com](mailto:admin@hggroupltd.com)

## Policy Updates

This Policy can change at any time and is available on our website. HG Group will notify any changes to this Policy by posting an updated version of the Policy on our website’s.

This policy is reviewed regularly

Last updated: 8 December 2022

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