

Privacy Policy

The Jewellery Group Pty Limited

Privacy Policy

Scope

For the purposes of this Privacy Policy, “us”, “our”, “we”, “TJG” means The Jewellery Group Pty Limited ABN 25 124 077 729 of 36 – 38 Henley Beach Road, Mile End SA 5031. “You”, “user”, “member” and “visitor” means anyone who may have dealings with us, including but not limited to our employees, anyone who uses our services or visits our websites, as the context requires.

This policy describes our practices in connection with information collected through all our services including provision of retail services, advertising services, websites, applications, competitions and customer surveys (collectively, the “Services”). By using or participating in the delivery of our Services, you agree to the terms and conditions of this policy. This policy applies to all persons who interact with us, including our employees, members of the public, advertisers, subscribers to Services and registered and unregistered users of Services.

In the course of our dealings with you, we and our related entities (including their service providers) may collect personal information about you which is protected under the Australian Privacy Principles and the applicable States’ privacy laws. For the purposes of this policy, “Personal Information” is information which may reasonably identify you in some way, and can include sensitive information.

This policy describes how your personal information will be collected, used, stored and disclosed in accordance with the Australian Privacy Principles, the applicable States’ privacy laws by us or on our behalf. This policy applies to any personal information which you or others provide to us or our agents in the course of our business or employment dealings with you relating to the Services. This policy does not always apply to our employees’ information insofar as it is excluded under the Australian Privacy Principles.

Personal information we may collect

We may collect a variety of personal information about you, depending on the circumstances of our dealings with you, such as the type of Service you may request or deliver and the payment methods chosen for the Services. If, in the course of our dealings with you, you provide personal information about a third party, your provision of that information is governed by federal and state privacy law. In order to comply with privacy law, we require you to notify the third party of your disclosure of their personal information to us and to refer the third party to this policy.

Customers

Personal information collected will commonly include your first and last name, a contact phone number and email address, credit card or other payment details, billing address, and any special requirements you notify to us with respect to the use of our Services (which may include information such as comments, likes, tweets, status comments, profile information and complaint details). Personal Information can also include photo or video footage e.g. CCTV ("**Personal Information**"). By providing this Personal Information to us, unless you indicate otherwise, we will assume that you have given your consent to the collection of such personal information.

Employees

We may collect employee personal information including name, address, date of birth and other relevant identification information, terms and conditions of employment, engagement, training and disciplinary information, performance or conduct information (including from CCTV), photo or video footage e.g. CCTV, membership records, leave records, taxation, banking and superannuation affairs that is directly related to the employment relationship between The Jewellery Group and the employee ("**Employee Records**").

Sensitive Information

We ask that you not send us, and you not disclose, any sensitive personal information (such as information related to racial or ethnic origin, religious or other beliefs, health information, political opinions, trade union membership or criminal background on or via the Services or otherwise). If, contrary to this request, you do provide any sensitive information, in doing so you consent to us collecting and handling that information in accordance with this policy.

We may collect "sensitive information" in limited circumstances relating to employment. We may collect sensitive information such as health information, employment records, educational qualifications and criminal records for the purposes of medical or background screening for employment application purposes. By providing this information to us, unless you indicate otherwise, we will assume that you have given your consent to the collection of such sensitive information.

How we collect and hold personal information

We may collect Personal Information in the provision of Services to you and when you deal with us in person, on the telephone, through our websites or by other correspondence, including by letter, fax or email. In addition, we may obtain Personal Information from participation in competitions and customer surveys relating to the Services.

When you access and interact with the Services, we may collect certain information about website visits. For example, in order to permit your connection to our website, our servers (or those of our service providers) receive and record information about your computer, device, and browser, potentially including your IP address, browser type, and other software or hardware information. These technologies may also be used to collect and store information such as pages you have visited, content you have viewed, search queries you have run and advertisements you have viewed in relation to your usage of our website and other websites you have visited. Third parties that support our Services by serving or hosting advertisements or providing services, such as allowing you to share content or tracking aggregate Services usage statistics, may also use these technologies to collect similar information. We do not control these third-party technologies and their use is governed by the privacy policies of those third parties using such technologies.

In all circumstances, your Personal Information and Employee Records will be stored by us in accordance with our privacy procedures and may be stored electronically or in paper copy on computer servers or on files under our control or with third party data storage providers. By way of example, Personal Information provided in the course of lodging a complaint regarding the Services may be included in software hosted by third party service providers under contract to us.

We will take reasonable administrative, technical and procedural steps to protect your Personal Information and Employee Records from misuse, interference and loss, or from unauthorised access, modification or disclosure. We will only hold information as long as required to perform the activities for which it was collected and dispose of appropriately when no longer required.

Why we collect personal information

We use the Personal Information and Employee Records we collect from and about you to provide the Services to you including to provide retail Services, measure and improve those Services, report to authorities, to improve your customer experience with our retail Services, to allow you to comment on the Services, to participate in competitions or rewards programs, to provide you with customer support, and to respond to inquiries. We may also use your Personal Information and Employee Records to improve the Services including through research and data analysis by us and our service providers.

We may use your information to provide the Services to you or to the general public (including via our websites), to fulfil administrative functions associated with these Services, to enter into contracts with you or third parties and for marketing and client relationship purposes.

We may periodically send promotional materials (including direct marketing materials) or notifications which we believe might be of interest to you. Promotional materials may include invitations to participate in various activities (such as customer surveys) or special

promotions or offers. If you do not want to receive direct marketing communications, please see the section below relating to 'opting out'.

Some of the Personal Information we collect will be essential for us to be able to accurately identify who is using the Services. Other types of personal information we collect will help us to profile who is using our Services and why to assist us with continuous service improvement.

All Employee Records collected shall be used strictly for purposes related to employment and will not be given, sold, rented or leased to any other party for unrelated purposes. Adequate security measures shall be maintained by us to minimise the risk of unauthorised access or distribution of Employee Records. When permitted or required by law, we may disclose Employee Records to a third party such as to a Fair Work Inspector or government agencies or third parties. It is the responsibility of all employees to act in a manner that respects and ensures employee confidentiality and privacy.

Who may receive your personal information

We may disclose your Personal Information and Employee Records to third parties, for example, to our contractors to whom we contract out certain services, other service providers, data processing companies for the purpose for which the information was collected or for related purposes, for example, to complete a payment transaction on your behalf or provide you with a Service that you requested.

We may make your Personal Information and Employee Records available to certain third party service and content providers, such as providers of data cloud services, website hosting service providers and software hosting companies that are engaged by us in relation to the Services.

We engage third party contractors and subcontractors that may be based in Australia or overseas, to perform services for us, which involves the contractor handling Personal Information and Employee Records we hold, for example to:

- operate sales and fulfilment functions;
- provide electronic funds transfer services, credit card account processing and related services;
- transfer penalty details to the State Debt Recovery Office;
- conduct market research;
- in the absence of any request otherwise, for the purpose of direct marketing communications to you;
- provide data processing services;
- and assist with obtaining payment from creditors.

We will require that any third party contractor only uses Personal Information and Employee Records about you for the specific purpose for which we supply it.

Your information may be shared between related entities where necessary to fulfil our business purposes (and other purposes specified in this policy). This may include the provision of your Personal Information or Employee Records to our related entities

overseas, specifically India and United States where considered by us as necessary to perform the Services outlined within this policy such as where computer servers or software is hosted in these countries for the provision of the Services.

We will seek your consent to disclose your Personal Information or Employee Records in any circumstances other than set out above, except:

- as necessary to prevent a serious risk to life, health or safety;
- as a necessary part of any investigation of suspected unlawful activity;
- as required or authorised under law; or
- as reasonably necessary to assist an enforcement body with law enforcement activities.

In limited circumstances, as described in the Fair Work Act, TJG may disclose Employee Records to a third party including:

1. To a Fair Work Inspector who can request information about employees in order to establish that TJG is meeting its employment obligations.
2. When required by law or Court order, TJG may provide the requested information to the appropriate government agencies or third parties.
3. If there is a suspected contravention of the Fair Work Act or an industrial instrument such as a modern award and a permit holder (generally a union official) wishes to enter an employer's premises to investigate this issue. The permit holder and TJG must not use or disclose personal information obtained in these circumstances for a purpose other than to investigate or remedy a suspected contravention.
4. If TJG has been asked by a (former) employee to act as a referee, TJG will disclose relevant information which directly relates to the employment relationship (such as the employee's skills, performance, conduct, and their terms of employment) when contacted for a reference.

Additional information for job applicants

If you apply or register your interest for a position with us (or a related entity) we may collect personal information including your name, contact details and the information provided in your application. In addition we may collect 'sensitive information' relating to the application process. Such 'sensitive information' may include health information, employment records, educational qualifications and criminal records for the purposes of medical or background screening for employment application purposes.

We may engage consultants to assist us in our recruitment process, including recruitment agencies and recruitment website operators. We may exchange your personal information with such consultants (who may be located internationally).

Those service providers may also collect your personal information directly and retain it for their own purposes, in which case you should ensure that you are aware of their privacy policy.

We may also exchange your personal information with your nominated referees, or for the purpose of any Police checks or verification of qualifications. Some of the personal information we request during the recruitment process we are required to collect under

workplace laws. We will rely upon all employee exemptions in the Privacy Act or related legislation.

How can you access and correct your personal information

If you would like to access, review, correct or update your personal information, you may contact us at privacy@thejewellerygroup.com.au. In your request, please include your email address, name, address, and telephone number and specify clearly what information you would like to access, review, correct or update. We may need to share your information with other third party service providers (such as software hosting companies) who can assist in responding to your request. We will try to respond to your request as soon as reasonably practicable.

On request, we will provide you with access to the information we hold about you within a reasonable time frame, unless providing access is exempt under the Australian Privacy Principles. We will provide you with written reasons, including the relevant exemption under the Australian Privacy Principles, if any request is refused.

How can you opt out or raise complaints

Our direct marketing materials will include a link to opt out/unsubscribe from receipt of such marketing materials.

If you would like to access your personal information, or have a question or complaint about the collection or use of your information, please write to:

Privacy Officer – The Jewellery Group Pty Ltd
GPO Box 976
ADELAIDE SA 5001

Alternatively, please email privacy@thejewellerygroup.com.au

We will provide a response as soon as reasonably practicable, but within 30 days. We will also let you know the next steps in resolving any complaint. If you are not satisfied with our response to your complaint, or at any time, you may refer your complaint to the Office of the Australian Information Commissioner (www.oaic.gov.au).

All requests and complaints will be dealt with in accordance with any internal privacy procedures and the Australian Privacy Principles.

Changes to this policy

Please note that we may make changes to this policy from time to time in accordance with changing business practices and laws. Please visit our website for the most recent version of this policy.