

PRIVACY POLICY

Date: 31 August 2021

Ross Roof Group Limited, Ross Roof Group UK Ltd, Ross Roof Group Japan Co., Ltd and their related companies and affiliates ("**we**", "**us**", "**our**") is committed to protecting and respecting your privacy. Our contact details are set out at the end of this policy. For United Kingdom ("**UK**") and European Union ("**EU**") data protection law purposes, we are the controller in relation to the personal data processed in accordance with this policy.

This Privacy Policy sets out the basis on which we will collect, store, use and share your Personal Information.

In this Privacy Policy, "**Personal Information**" means information about an identifiable (either directly or indirectly) individual. For example, this type of information includes your name and contact details.

COLLECTION OF PERSONAL INFORMATION AND DATA

Collection

We may collect Personal Information from you when you communicate or interact with us such as when you:

- make enquiries about us, our products and services or contact us for any other reason so that we can process, deal with, and respond to your queries or other issues including any complaints;
- contact, register with, post to, like or follow any of our social media websites, pages, forums or blogs;
- use or register on our website (including downloading or registering for any offer on our website);
- register a product you have purchased or subscribe to any of our services;
- register for and attend any of our events;
- make applications for prospective employment and contracting opportunities with us; or
- subscribe to a newsletter, fill out a form or survey, enter or participate in any competitions or promotions.

We will usually only collect Personal Information directly from you. We may also collect Personal Information from third parties where it is unreasonable or impractical to collect Personal Information from you directly, where you have authorised collection from such third parties, where those third parties are marketing service providers or data resellers whose data we use for marketing or research, or from publicly available resources.

Personal Information we collect about you

We may collect the following Personal Information about you:

- your name;
- who you work for, and your job function or department;
- your address, phone number, email address or other contact details (these details may relate to your work or to you personally, depending on the nature of our relationship with you or the company that you work for);

- information about you that you give us by communicating with us by phone, by e-mail, via our website, via social media or otherwise. It includes information you give us or that we obtain when you use our website, obtain or subscribe to our goods or services, supply us with goods or services, enquire about a product, place an order, enter a competition, promotion or survey, or contact us to report a problem, or do any of these things on behalf of the person that you work for;
- information relating to transactions with us involving you or the company you work for (for example, details of goods or services that we have supplied to, or obtained from, you or the person you work for);
- other information relating to you which it is necessary for us to process in order to enter into or perform a contract with you or the company you work for;
- information about events to which you or your colleagues are invited, and your personal information and preferences to the extent that this information is relevant to organising and managing those events (for example, your dietary requirements);
- like many site operators, we collect information that your browser sends whenever you visit our website ("**Log Data**"). This Log Data may include information such as your computer's Internet Protocol address, browser type, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages and other statistics. In addition, we may use third party services such as Marketing Automation Platform tracking code and Google Analytics to collect, monitor and analyse this data.

Cookies

A cookie is a small data file, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive. Like many sites, we use cookies to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our website.

COLLECTION OF PERSONAL INFORMATION AND USE

We collect and use your Personal Information to provide you with roofing and related products and services. Some of the things we use your Personal Information for in relation to those purposes are:

- to contact or identify you;
- to provide you with content that you have requested from us, for example using our "contact us" link;
- to provide information to you about other websites, products and services, which we consider may be of interest to you (but if you ask us not to provide you this information we will comply with your request);
- evaluating and improving our customer service;
- protecting and enforcing our rights as part of our relationship with you;
- cyber security and information assurance purposes;
- complying with applicable laws;
- conducting market research, data processing and statistical analysis activities; or
- for any other purposes authorised by you.

If you do not provide your Personal Information as we have requested, we may be unable to provide you with our products or services.

If you are located in the UK or EU, see our purposes table [here](#) for more information about the lawful basis we rely on to process your Personal Information.

Please note that if you are a Japanese resident we will also act in accordance with the laws and regulations of Japan, guidelines etc., published by the Personal Information Protection Commission regarding Personal Information.

STORAGE OF PERSONAL INFORMATION

We may store your Personal Information physically or electronically ourselves, or with third parties that we contract to hold information for us in New Zealand and overseas. We will act reasonably to ensure that your Personal Information is protected from unauthorised access, use, modification or disclosure.

DISCLOSURE OF PERSONAL INFORMATION

We may use your Personal Information for the purposes set out above in this Privacy Policy. As part of this use of your Personal Information, we may disclose your Personal Information to the following third parties:

- our related companies and affiliates;
- third party contractors and providers of goods and services, such as courier and delivery companies, marketing and promotion companies, training and training certification agencies and business support services like storage and handling of documents and data, and information technology service providers;
- market research companies who undertake customer surveys for us;
- professional service firms providing services to us, such as legal or accountancy services; or
- others where required by law.

We will not otherwise disclose your Personal Information unless we believe on reasonable grounds that you have provided your authorisation. However, you should be aware that we may be required to disclose your Personal Information without your consent in order to comply with any court orders, subpoenas or other legal process or investigation including by tax authorities, if such disclosure is required by law. Where possible and appropriate, we will notify you if we are required by law to disclose your Personal Information.

Overseas Disclosures

If one or more of the third parties, related companies or affiliates referred to above is located overseas, disclosure may occur outside New Zealand to those parties.

When we disclose your Personal Information outside of New Zealand, we will only do so in accordance with the Privacy Act 2020 and take all reasonable measures to ensure that your information is held, managed and accessed in accordance with appropriate standards for the handling of Personal Information.

UK and EU residents

The data that we process in relation to you may be transferred to, and stored at, a destination outside the United Kingdom ("UK") or the European Union ("EU") that may not be subject to equivalent data protection law. It may also be processed by staff situated outside the UK or EU who work for us or for one of our suppliers.

We may transfer your personal information outside the UK or EU:

- In order to store it.
- In order to enable us to provide goods or services to and fulfil our contract with you or the company your work for. This includes order fulfilment, processing of payment details, and the provision of support services.
- Where we are legally required to do so.
- In order to facilitate the operation of our group of businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

Where your information is transferred outside the UK or the EU, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on a recognised legal adequacy mechanism, and that it is treated securely and in accordance with this privacy policy. We transfer your Personal Information to New Zealand, which currently has an adequacy regulation from the UK's Information Commissioner's Office and the European Commission in relation to Personal Information, which means it is deemed to have adequate protections in place for Personal Information.

EMAIL AND TEXT COMMUNICATIONS

If you subscribe to emails and/or text communications, or otherwise provide your email address and/or mobile number, where permitted in our legitimate interest or with your consent where required by law, we will send you emails and/or texts (as the case may be) which promote and market our products and services from time to time.

You can unsubscribe from our email communications and/or text communications at any time by clicking the "Unsubscribe" link in any promotional or marketing email or text received or by emailing an unsubscribe request to info@rossroofgroup.com.

Once you have unsubscribed from the email or text communications, you will be removed from the corresponding marketing list as soon as is reasonably practicable.

YOUR RIGHTS

In certain circumstances you may request access to the Personal Information we hold about you, request that we update, correct or delete any Personal Information we hold about you, request that we restrict the processing of your Personal Information or object to it being further processed, or request that we move your Personal Information to a third party by setting out your request in writing and sending it to us at info@rossroofgroup.com.

If you are a UK or EU resident and your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority, (see http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html). The Information Commissioner's Office is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

We will review your request as soon as reasonably practicable and in accordance with applicable laws. If we are unable to give you access to the information you have requested, we will give you reasons for this decision in accordance with the requirements of the Privacy

Act 2020 or the UK or EU General Data Protection Regulation as applicable when we respond to your request.

Your right to withdraw consent

Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us (details set out below under the Contact Us section). You can also change your marketing preferences at any time as described in 'Our promotional updates and communications' section.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will only keep your Personal Information for as long as we require it for the purpose for which it was collected. However, we may also be required to keep some of your Personal Information for specified periods of time, for example under certain laws relating to companies, money laundering and financial reporting legislation.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

CHANGE OF OWNERSHIP

In the event of a change of ownership of all or a portion of our business or the website, your Personal Information may be transferred to the new owner so that the business and/or website and its affiliates or related companies can continue operations.

CHANGES TO THIS PRIVACY POLICY

We may modify, amend, change or replace any of the terms, conditions or provisions of this Privacy Policy from time to time, and will notify you of any changes by posting the updated version on our website. It is your responsibility to check this Privacy Policy periodically for changes.

Your continued use of this website, and our products and services, following notification of any changes to this Privacy Policy will be taken as acceptance of those changes.

CONTACT US

If you have any questions about this Privacy Policy, please email us at info@rossroofgroup.com or contact us in writing at (as applicable):

- Ross Roof Group, 1c Inlet Road, Takanini, Auckland, 2112, New Zealand; or
- Ross Roof Group UK Ltd's contact details are: Foresters Hall, 25-27 Westow Street, London, England, SE19 3RY; or
- Ross Roof Group Japan Co., Ltd's contact details are: ZIP code: 103-0012, 1-5-7 Nihonbashi Horidome-cho, Chuo-ku, TOKYO, JAPAN.

Purpose and lawful basis for processing of personal data

This table sets out:

- What personal data we process

- What we use that data for
- The lawful basis for the processing

It forms part of our privacy policy above which you should also read.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver orders including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Contacting and identifying you (b) Notifying you about changes to our terms or privacy policy (c) Asking you to leave a review or take a survey (d) providing you with any information that you request	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to manage our customer relationships, evaluate our customer service and to keep our records updated and to study how customers use our products/services)
To enable you to partake in an event, subscribe to a newsletter, fill out a form or survey, enter or participate in any competitions or promotions	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

<p>To administer and protect our business and this website (including troubleshooting, cyber security, information assurance, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)]</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>(a) Necessary for our legitimate interests (to develop our products/services and grow our business) (b) Consent where required by law</p>