



Points and Perks - Privacy Policy

Scope

Metcash Trading Limited ABN 61 000 031 569 and its related bodies corporate, including Australian Liquor Marketers Pty Limited ABN 52 002 885 645 and Tasman Liquor Company Limited NZBN 9429038227714, trading as the “Allied Retail Group” (collectively, “Metcash”, “we”, “our” or “us”) are committed to the protection of the privacy and rights of individuals in relation to their personal information.

This Privacy Policy tells you how we collect, hold, use, and disclose your personal information in connection with your participation in the Points and Perks Program (**Program**) (whether as a member, Program partner, reward provider or otherwise), and/or use of social pages, and other Program digital services, if any.

This Privacy Policy does not apply to our handling of personal information in other contexts. Our handling of personal information outside the context of the Program is described in our general privacy policy, located at: <https://www.metcash.com/legal/privacy-policy/>.

Where we refer to the ‘Privacy Act’ in this Policy we mean the Privacy Act 2020.

Updates to this policy

We may update this Privacy Policy from time to time. We will notify Program members by email of any material changes to this Privacy Policy.

If you would like a copy of this Privacy Policy or have any concerns about our handling of your personal information, you can contact our Privacy Officer using the details provided in section 11 below (“How to contact us or make a complaint”).

What personal information do we collect and hold in connection with the Program?

The types of personal information we collect and hold about Program members may include:

- name(s);
- contact details (e.g., address, email address, telephone number);
- other identification information (e.g., date of birth, membership numbers or other personal identifiers related to your participation in the Program);
- details of your Registered Store(s);
- household / demographic information;

- transaction information / history (including details of the products you purchase, and the value of your purchases);
- details and history of preferences, interests and behaviour relating to transactions, products and interaction with our digital services and platforms;
- reward details (including details of reward redemptions);
- records of your communications and interactions with us and in connection with the Program; and
- other personal information you provide to us.

The kind of information we may collect regarding other participants in the Program (such as Retailers) includes:

- name(s);
- contact details (e.g., address(es), email address(es), telephone number(s));
- relevant employment details (e.g., role title); and
- any other personal information those participants provide to us.

From time to time, you may provide us, and we may collect from you, the personal information of a third party. Where you provide the personal information of third parties, you agree that you will ensure that those persons are aware of this Privacy Policy, understand it and agree to accept it, and that you have their consent to provide the information to us.

How do we collect your personal information in connection with the Program?

Metcash generally collects your personal information directly from you unless it is unreasonable or impracticable to do so. We may collect your personal information in the following ways when you:

- use or access Program-related digital services;
- email or contact us, or we otherwise have conversations with you (such as in-store or over the telephone); or
- have other dealings with us, or otherwise in the course of us providing you with a requested product, service, or benefit.

For Program members, we may also collect your information when you:

- register to participate in the Program directly with us;
- use the loyalty card which has been linked to your Program account, including when you make a purchase;

- participate in a promotion, competition, or survey in connection with the Program; and/or
- redeem a reward or access an offer provided in connection with the Program.

We may also collect personal information from third parties including:

- Retailers and their service providers (such as point of sale vendors);
- other Metcash group companies; and
- your representatives (including legal representatives).

How do we hold and protect your personal information?

We hold personal information in a combination of computer storage facilities, paper-based files, and other records, both at our own premises and with the assistance of service providers.

In so doing, we take reasonable steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification, or disclosure.

When we no longer need your personal information, we take reasonable steps to destroy or permanently de-identify the information.

Consequences if you do not provide personal information

If you do not provide your personal information, we may not be able to provide you with products, services, or benefits in connection with the Program. For example, if you have not provided your email address, we will not be able to issue personalised email communications.

Why do we collect, hold, use, and disclose your personal information?

General

We handle your personal information for the purposes of providing, administering, improving, and personalising the Program, our products and services, and the products and services of Allied Retail Group Retailers and other Program participants. This can include registering you to participate in the Program; enabling you to access Program portals; providing Program benefits; managing Program promotions and competitions; offering and facilitating the offer of other Program benefits; offering and facilitating the offer of other products or services that may be of interest to you; verifying your identity, communicating with you (including through direct marketing, where we are permitted to do so); understanding your interests and preferences to help us tailor our communications and offers and to improve our offerings and the offerings of the Allied Retail Group Retailers; handling your queries and complaints; assessing the performance of the Program app and digital platforms and improving their operation; for

other data analytics purposes, including to provide participating The Allied Retail Group Retailers with information about the purchasing trends of members who have registered that Allied Retail Group Retailer as their Registered Store and to provide aggregated, anonymous information about Program activity, shopper trends and campaign/promotional performance, and other Program insights, to Allied Retail Group Retailers and other Program participants; conducting surveys, and market and product research; otherwise providing goods, services and benefits you have requested or are eligible to receive in connection with the Program; working with our service providers; and any other purposes which we have notified to you at the time of collection of the information, or to which you have provided your consent.

Corporate/Legal

We may also handle your personal information:

- to enforce our legal rights and obtain professional advice;
- to comply with industry standards and our policies;
- for other activities that you may reasonably expect us to use the information for;
- as required or authorised by law or a court or tribunal order; and
- to facilitate purchases or potential purchases of, or investments in, our business or a group company.

Direct marketing

Where we have your consent or are otherwise permitted by law to do so, we may also use and disclose your personal information to provide you with marketing communications and targeted advertising on an ongoing basis by electronic messages (such as SMS or email), through our digital services and by other means. These communications may be sent by third parties on our behalf.

These communications may relate to the products and services we, other Program participants (such as our Retailers or rewards providers) and other group companies provide, and other products or developments which may be of interest to you.

You may opt-out of receiving future electronic direct marketing communications through the unsubscribe function that will be made available to you with each direct marketing communication although this may limit your ability to receive the benefits of the Program. Please see the Member Terms and Conditions to understand the consequences of unsubscribing from email communications.

Who do we disclose your personal information to?

We may disclose your personal information to:

- various third party service providers we or our group companies engage in connection with the Program, including service providers who assist with the development, administration, marketing, or improvement of the Program, or with Program-related data processing/analysis;
- other Program participants, including rewards providers, as is reasonable or necessary for the operation of the Program. In this regard, we do not share identifiable member data with Allied Retail Group Retailers. However, we may use and analyse member personal information to create aggregated, anonymous data which we report to other participating Allied Retail Group Retailers and other Program participants, to enable them to gain insights into general shopper trends and campaign and store performance;
- our professional advisers such as accountants, solicitors, business advisers and consultants;
- government bodies and regulatory authorities, including if required or authorised by law;
- companies that we plan to merge with or be acquired by or who may invest in us or our group companies; and
- our related group companies, for their internal purposes only.

Digital Technologies

We and third parties may use digital technologies such as cookies, location services, web server logs and web beacons in connection with the Program app, social pages, and other digital portals. Some of these technologies may operate without collecting or using any personal information. Please note this privacy policy applies to our collection, use, disclosure, and storage of personal information only.

How you can access and correct your personal information

We will take reasonable steps to make sure that the personal information we collect, use, or disclose is accurate, complete, and up to date.

At your request, we will provide you with a copy of, or correct, any personal information which we hold about you, unless an exception under the Privacy Act applies. We may charge reasonable fees for retrieving this information, in which case we will inform you of the fee and obtain your agreement to that fee before providing the information.

How to contact us or make a complaint

If you have any questions about this Privacy Policy, if you wish to update or request access to information we hold about you, or if you wish to make a complaint about our

collection, use or disclosure of your personal information in connection with the Program, please contact us at:

The Privacy Officer
Metcash Trading Limited
1 Thomas Holt Drive Macquarie Park NSW 2113
Fax: (02) 9741 3027
E-mail: privacy@metcash.com

We will promptly acknowledge and investigate any complaint about the way we manage personal information.

We will take reasonable steps to remedy any issues resulting from our failure to comply with our privacy obligations. If our response to your complaint does not address your concerns to your satisfaction, you may have the right to make a complaint to the Privacy Commissioner, at the following link: www.privacy.org.nz/your-rights/making-a-complaint-to-the-privacy-commissioner/complaint-self-assessment/