



# Coates Group Privacy Policy

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## 1. Introduction

This Privacy Policy sets out how Coates collects, stores, uses and discloses "personal information" in accordance with applicable privacy laws (including the Australian Privacy Act, European GDPR and California Consumer Privacy Act ("**Privacy Laws**"). In this Policy, "personal information" is information or an opinion about an identified individual or an individual who is reasonably identifiable.

## 2. Who are we

In this document 'Coates' or 'we' or 'us' refers to Coates Consolidated Holdings Pty Limited (ABN 62 165 857 787) and its direct and indirect subsidiaries anywhere in the world ("Coates Subsidiaries").

## 3. What information do we collect and hold

Coates may collect and hold the following personal information about our customers and / or visitors to our website or other online platforms ("you"):

- contact information and identification such as your name, telephone number(s), email address(es), business address(es), business registration number;
- payment details (such as account or credit card details) and payment-related information in connection with your purchase of our products and services;
- information collected from product research, customer surveys, your interactions with Coates including via social media, or publicly available information that you post or publish;
- location;
- any other information relevant to your engagement with Coates.

**Providing someone else's personal information:** If you provide us with personal information about another person (such as a franchisee for a brand you work for), please advise them that you have done so and share this Policy with them so they are aware that you have provided their information to us and that they can read this Policy to understand how their information will be handled.

### Information we collect automatically

Whenever you visit or interact with Coates's website or other online platforms ("**Platforms**"), we may use a variety of technologies that automatically or passively record information about how the Platform is accessed and used ("**Usage Information**"). Usage Information may include your IP address or other unique identifier for the device used to access a Platform ("**Device Identifier**"), browser type, "**Device**" type (computer, mobile phone, tablet or other device), operation system, application version, date and time of visit, pages viewed, preceding page views and your use of features or applications on the Platform.

Usage Information helps us keep our Platforms relevant to users. Usage Information is generally non-identifying, but if we associate it with you as a specific and identifiable person, we will treat it as personal information (refer to section 5 and 6 on how we collect and use personal information).

We may use Device Identifiers to help us administer Platforms, diagnose problems with our servers, analyze trends, observe Platform usage and activity over time, help identify you, and gather broad demographic information for aggregate use.

**Cookies** We or our external service providers may collect cookies from you (data files placed on a Device when it is used to visit a Platform) for security purposes, to facilitate site navigation and personalise your experience while visiting our Platforms.

Our cookies only contain de-identified information. To learn how you may manage cookies, or delete cookies that have already been installed, please refer to your browser's help menu or instructions. If you disable or opt out of receiving cookies, some features and functions on our Platforms may not work properly. In addition, some content on our Platforms may not be as relevant to you.

#### **4. Links to other websites**

The Coates website (and other materials we provide to you) may contain links to third party websites. The operators of those websites may have privacy policies and practices which differ from our own. Coates is not responsible for the content of any external website or the privacy practices of any third party.

#### **5. How we collect personal information**

Coates may collect personal information in a variety of ways, including:

- directly from you, when you interact with us in person or by telephone, by electronic messages (including email and SMS) or other forms of communication;
- directly from you, via our website (requests for information);
- when you use data-collecting devices, products or systems;
- from your agents or representatives who act on your behalf;
- from industry databases;
- from third parties such as advertising and marketing partners that we collaborate with to produce industry related content;
- from publicly available sources such as the Internet and telephone directories.

#### **6. How we use your personal information**

Your personal information may be used in order to:

- provide our products and services;
- market our products and services (whether directly or through third parties, such as search engines or social media);
- communicate to you in relation to our products, services and our promotional activities (directly - - e.g. via email - or through third parties such as search engines or social media);
- provide customer assistance and support such as product trouble shooting and assisting with warranty claims (whether directly or through third party contractors);
- improving your customer experience and our marketing, including through data analytics, product planning, product development and research;
- comply with our legal obligations including an order of a court or tribunal;
- monitor our performance and to help us manage our services;
- identify and contact individuals who do business with us;
- train our employees and other representatives;
- conduct customer and market research and analytics to improve the quality of our products and services;
- handle complaints and disputes; and
- detect, investigate and prevent fraud.

We may contact and communicate with you either via telephone, post, facsimile, email or SMS.

For more information contact [info@coatesgroup.com](mailto:info@coatesgroup.com)

We may publish (including by posting on social media) customer testimonials/images/videos which may contain personally identifiable information. In each case, we will obtain the customer's consent prior to publishing any content.

## **7. Direct Marketing**

Coates may send you direct marketing to inform you about products or services, special offers, promotions and events that may be of interest to you. These marketing communications may be sent to you using any contact details provided by you, such as post, phone, email or SMS.

Your consent to receive direct marketing communications from Coates in the above ways will be deemed if you do not opt out when you are offered the opportunity to do so and will remain current on an ongoing basis unless and until you advise otherwise. If you do not want to receive such offers from us or do not want us to disclose your personal information to our related entities for marketing purposes, you can opt out at any time by contacting us using our contact details provided at the end of this document or by utilising the "unsubscribe" function in electronic communications. In some circumstances we may need to contact you to obtain additional information, verify your identity or to clarify your request, in order to action it.

If the law requires us to provide you with information about our products or services (for example, product recalls), we will provide that information even if you have elected not to receive information about our products and services generally.

## **8. When we disclose your personal information**

We may disclose your personal information to organisations outside of Coates. These organisations may include:

- outsourced service providers who manage or supply services we provide to you such as installation and product maintenance;
- government, regulatory and law enforcement authorities and organisations, as required or authorised by law;
- our advisors (including legal and accounting advisors).

Those entities are not authorised by us to use personal information for anything other than the purpose for which we supplied that information to them. We may also disclose personal information where you consent to us doing so. That consent may be written, verbal or implied from your conduct.

## **9. Disclosure to overseas recipients**

Coates staff work around the world and as a result, personal information collected and held by Coates may be transferred overseas in accordance with this Policy. The countries in which these recipients may be located may vary from time to time, and may include, without limitation: Australia, India, Singapore, United States of America, United Arab Emirates, China, France, Netherlands, Japan, Canada. We will only disclose personal information to Coates staff outside the country from which you provided your information where reasonably necessary to provide products and services to you, improve our products and services, or address a request or complaint from you.

## **10. How we hold and store your personal information**

Coates may hold your personal information in a number of ways, including:

- in our computer systems or databases, which may involve storing data on storage or computer systems provided by third party suppliers;
- in paper records; and/or

For more information contact [info@coatesgroup.com](mailto:info@coatesgroup.com)

- in meeting recordings – your consent for the meeting to be recorded would have been obtained at the start of the meeting.

We may combine personal information we receive about you with other information we hold about you.

Coates will store your personal information in a secure environment protected by a combination of physical and technological safeguards. We have taken all reasonable steps to carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. If you want more information about the ways we manage the information we hold, please contact us as we would be happy to provide you with further information on our processes. Our contact details can be found at the end of this document.

### **Help us to ensure we hold accurate information**

Coates takes reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information you provide. We recommend that you:

- let us know if there are any errors in your personal information; and
- keep us up to date with changes to your personal information such as your name and address.

From time to time, we may ask you if your information is still accurate and up to date. If you find that any information that we hold about you is incorrect, you should contact us immediately and we will take reasonable steps to correct it.

### **You can access your personal information**

You have a right to access your personal information, subject to some exceptions allowed by law. If you would like to access and request the correction of information we hold about you, you can contact us in any of the ways set out at the bottom of this Privacy Policy. You may be required to put your request in writing for security reasons and in some circumstances, we may need to charge a fee to recover the reasonable costs incurred. This charge is only designed to help us reasonably recover the costs associated with providing you with access and does not apply to the making of the request. Before we act on a request, we will provide an estimate of the access fee and ask you to agree to it.

Access to your information may be refused in a number of circumstances, such as where the information relates to anticipated legal proceedings or if the request for access is frivolous or vexatious. If we deny or restrict your access, we will write to you to let you know why, unless, having regard to the grounds for the refusal, it would be unreasonable for us to do so. You may make a complaint about a refusal to the Office of the Australian Information Commissioner if your complaint relates to privacy issues in Australia, or, otherwise, to the applicable privacy or information regulator.

## **11. How to contact us**

If you wish to notify us of your new contact details, update your personal information, opt out of direct marketing, make a complaint about a privacy issue or have any questions in relation to this Privacy Policy, please contact us by telephone, email or mail, as set out below:

### **Telephone**

Australia:  
+61 2 9699 3122  
8:30 am – 5:00 pm Monday to Friday (excluding Public Holidays)

For more information contact [info@coatesgroup.com](mailto:info@coatesgroup.com)

North America:  
+1 312 374-1365  
8:30 am – 5:00 pm Monday to Friday (excluding Public Holidays)

China:  
+86 8741 0993  
8:30 am – 5:00 pm Monday to Friday (excluding Public Holidays)

Japan:  
+81 3 4570 1200  
8:30 am – 5:00 pm Monday to Friday (excluding Public Holidays)

France:  
+86 8741 0993  
8:30 am – 5:00 pm Monday to Friday (excluding Public Holidays)

Netherlands  
+31 020 399 2500  
8:30 am – 5:00 pm Monday to Friday (excluding Public Holidays)

India  
+91 98201 10075  
8:30 am – 5:00 pm Monday to Friday (excluding Public Holidays)

Dubai  
+971 4 244 3733  
8:30 am – 5:00 pm Monday to Friday (excluding Public Holidays)

## **Email**

To: [info@coatesgroup.com](mailto:info@coatesgroup.com)

Note: Please include “Privacy Complaint” in the subject of your email.

## **Mail:**

To: Coates Group Legal Department - Privacy

At: 36 Doody Street, Alexandria NSW 2015, Australia

## **12. Making a Complaint**

If you believe that your privacy has been compromised, or if you feel that we have breached the Privacy Laws, you are entitled to make a complaint. Complaints can be made by contacting us using our contact details in the “How to Contact Us” section of this Privacy Policy. Where contacting us by email, please include “Privacy Complaint” in the subject of your email.

You will need to provide us with details of your complaint and any supporting evidence and/or information. You will receive an acknowledgement from us no later than 10 business days after receipt of your written complaint.

We will investigate your complaint in accordance with our internal complaints resolution process and determine the steps (if any) that we will undertake to resolve your complaint. We will contact you if we require any additional

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information from you. You will be sent the final decision in writing no later than 20 business days after receipt of your written complaint if we have all the necessary information to make that decision. When this is not possible, we will contact you and let you know how long it will take for us to resolve your complaint.

If you disagree with our decision, you may refer your complaint to the applicable privacy or information regulator.

### **13. Changes to our Privacy Policy**

This Privacy Policy may be amended at any time. The updated version will be available by following the “Privacy Policy” link on Coates’s website homepage, at [www.coatesgroup.com](http://www.coatesgroup.com). You should check the Privacy Policy regularly for changes.

This Privacy Policy was last updated in February 2024.