

## **Kingspan Insulated Panels - Customer Privacy Statement (New Zealand)**

Please read this privacy notice carefully as it sets out how Kingspan Limited (“Kingspan”) uses your personal information.

At Kingspan, we are committed to processing personal information about our customers in ways that comply with our legal obligations as well as being clear with our customers about what we do with their personal information. We share your concern about the protection of your personal information and are committed to safeguarding your privacy.

In view of the international nature of our company there may be circumstances in which the General Data Protection Regulations (GDPR) will apply. If that applies to your circumstances, we will be the “controller” of the personal information which you provide to us or which we collect from you.

### **What is personal information?**

Personal information is information relating to an identified or identifiable individual. This document covers information we collect about you.

Some of the key points of Kingspan’s privacy statement are:

- **We will never** sell your data to third parties without your prior consent.
- **We will** make it easy for you to manage your information and you can change your communication preferences at any time.
- **We do** use data to help us provide great customer service, which includes tailoring the information we share with you to help ensure that it’s relevant, useful and timely.

### **Personal information that we collect**

In the course of your dealings and interaction with Kingspan we process personal information to allow us to complete our service and commitment to you as a customer.

The types of personal information we may process include, but are not limited to:

- Identification data e.g. name.
- Contact details e.g. postal address, telephone/email, job title, company name, company type, your role.
- Project details e.g. project name, project address, project type, size of opportunity.
- Website usage data including your web visits and IP address (please see the Website Privacy Notice <https://www.kingspan.com/nz/en-nz/website-privacy-notice> for full details)
- Marketing preferences and communication with you for marketing purposes as well as information we infer when we combine information to determine how best to interact with you (please see our email privacy notice).
- Surveys you have completed.
- Any other personal information that you choose to provide to us when you complete our online contact forms or otherwise make contact with us.

## Sources of personal information

Usually you will have provided the information we hold about you but there may be situations where we collect personal information from other sources. The following are the types of information we may collect about you and the source of the information:

- Project information supplied by third parties involved in projects that we are engaged on. This data includes major project details and contact details of responsible person(s) for those projects.
- Your delivery address and contact details supplied by our direct customer base whom we are delivering on behalf of.
- Other group companies may pass your details onto us if you have contacted them by mistake for products that we manufacture.

## How we use your personal information

We use your personal information as follows:

- To comply with our legal obligations;
- To investigate and respond to potential violations of law or of our website policies as well as to potential breaches of our or relevant third parties' systems and networks;
- To identify you and communicate with you;
- To keep internal records;
- To develop products and services; occasionally we may contact you with service and product surveys. We may contact your company and individuals within your company to complete a survey;
- To fulfil your requests and answer your queries or complaints;
- For market research and to assess marketing strategies and campaigns;
- If you already are a customer or other contact of ours, to update our information about our contact with you on our customer relationship management system;
- To deliver our own products and services to you;
- To market our own products and services to you; through means such as newsletters and invitations to events.

## Marketing

We would like to provide you with information about Kingspan's products and services, and other information from Kingspan, which we think you may find interesting. We may send you such information by post, email and/or telephone if you agree we can or unless you have asked us not to do so (see below).

We do not provide your personal information to external organisations (i.e. to contractors, merchants, distributors and retailers, which are outside of Kingspan) for their own direct marketing in relation to Kingspan products and services without your explicit consent.

If at any time you do not want your information used for direct marketing purposes by a Kingspan company, please contact the relevant Kingspan company from which you have received marketing so that they can unsubscribe you from their marketing lists. If you have received email marketing from a Kingspan company and decide that you no longer wish to receive marketing emails from them, you will be able to opt out of receiving further email marketing from them by following an unsubscribe link in the email, or by such other means as we may communicate to you, including but not limited to telephone and post.

Please note that as we do not as a group operate a global marketing database which means we are unable to unsubscribe you from marketing from all Kingspan companies centrally. For further information on our collection and use of your personal information for marketing purposes, please see our email privacy notice.

### **How we share your personal information**

In addition to the sharing of information mentioned above under section 4 (Marketing), we may share your personal information with third parties as follows:

- in order for us to process payments that are due to us, in doing so we provide bank card details to such providers;
- to receive services from our providers such as our IT service providers and therefore may access or receive personal data in the context of providing services to us;
- to licensed credit reference agencies, debt collection agencies and lawyers when we carry out credit checks, to report on your payment performance and/or to seek to recover debts due to us;
- to our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice;
- to emergency services in the event that we need to report accidents or incidents or request emergency assistance or to other third parties where necessary to protect the vital interests of a person (for example they need urgent medical attention);
- to any Government Department, public body or other third party where we believe in good faith that the law requires this; in the interests of public health and safety; or in order to protect the rights, property, or safety of Kingspan, its employees or others;
- with other third parties to comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, or to meet national security or law enforcement requests, including, but not limited to, a subpoena or search warrant;
- as necessary to establish, exercise or defend against potential, threatened or actual litigation;
- in connection with the sale, assignment or other transfer or all or part of our business; and;
- for the purpose of mutual business opportunities with others.

### **Legal basis for processing personal information**

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms.

In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

Mostly, however, we process contacts information for our legitimate business interests in the context of providing or receiving services to customer or from our service providers or in the case of partners, for the purpose of the collaboration or partnership. If we collect and use your personal information in reliance on anything other than our legitimate interests, we will make

clear to you at the relevant time. For example, if we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the 'Contact us' heading below.

### **How long we keep your personal information**

We retain your personal information for no longer than is necessary for the purposes for which the personal information is collected, taking into account, but not limited to, any legal obligations and applicable tax and accounting requirements we have to retain data for certain periods of time and contractual obligations such as in order to fulfil warranty/product guarantee obligations.

Thereafter we will erase your information securely once it is no longer needed unless erasure is not possible (for example, because your personal information has been stored in backup archives), and in which case we will securely store your personal information and isolate it from any further processing until deletion is possible.

### **International data transfers**

Kingspan hold and share data with Kingspan Holdings, affiliates and relevant third parties who are compliant with our data policies.

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

We have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Statement, and to at least the same standards as required under the Privacy Act 1993.

### **General Data Protection Regulation (GDPR)**

Kingspan is part of a group of companies within the European Union, insofar as Kingspan is required, Kingspan will comply with the requirements of the GDPR in respect of your personal information in addition to the requirements of the Privacy Act 1993.

### **Security**

Kingspan is committed to ensuring that your personal information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures where relevant to safeguard and secure the information we collect.

### **Your rights**

You have the right to be informed that we hold your personal data, the right of access to that data we hold, the right to rectification of any errors in that data, the right to erasure, sometimes referred to the right to be forgotten, the right to restrict how we process your data, the right to data portability and the right to object to how we process your data. You also have the right to opt out of marketing communications at any time.

These rights can be exercised at any time. They are not absolute and are subject to certain exceptions and/or qualifications.

If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You are also entitled to make a complaint to a data protection regulator, which for New Zealand is the Office of the Privacy Commissioner. Their contact details are available on the Privacy Commissioner's website: <https://www.privacy.org.nz>.

If you do have any concerns about how we process your personal data, you can also contact us using the contact details at the end of this Privacy Statement.

### **Updating this statement**

We review our privacy practices from time to time. We ask that you bookmark and periodically review this page for updates to our Privacy Statement.

### **Contact us**

For further information regarding these rights, about this Privacy Statement generally or to make a complaint please contact us at [APACdataofficer@kingspan.com](mailto:APACdataofficer@kingspan.com)

Before assessing your request, we may request additional information in order to identify you. If you do not provide the requested information and, as a result we are not in a position to identify you, we may refuse to action your request.