

## **Kingspan Insulated Panels – Email Marketing Privacy Statement (New Zealand)**

Kingspan Limited (the “**Company**”, “**we**”, “**us**” or “**our**”) collects and processes personal information relating to you in connection with its business dealing with you. We collect personal information in compliance with our obligations under applicable data protection law including the Privacy Act 1993.

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

This Privacy Statement explains what personal information relating to you is collected for email marketing purposes, the purposes for which it is used and how you can exercise your data protection rights in relation to that data.

### **Personal information that we collect and sources of information**

The majority of personal information that we hold for marketing purposes is obtained directly from you, but we also gather information which is observed from any interactions you have made with our marketing emails or website, including email opens/clicks, web visits, forms and surveys you have completed, and information that is inferred, that is we combine information together to determine how best to interact with you.

The personal information that we collect directly from you includes your name, title, company name, address, email and job role. This is collected from you when you either: complete an enquiry form on our website; signed up to receive our emails or when you provided this information directly to our sales team.

We might also ask you to indicate a preference for a particular topic or event; we will use this information to make the content of our emails more relevant to you.

If you have consented to receive email marketing communications, we will hold a record of your preferences as well as a record of the email communications we have sent to you.

We use a third-party provider to deliver emails. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our email communications.

### **Purposes of processing personal information**

We use your personal information in order to send you information about our products, our services, training and events that we believe may interest you. We may, occasionally, send surveys or even direct one-to-one emails in order to improve our processes, products and services.

We use your personal information for these purposes for as long as you want to receive marketing from us. If you decide to opt-out of or withdraw your consent to our marketing, we will no longer use your personal information for this purpose. We might need to keep your email address only on our unsubscribes list to ensure no further emails are sent to it; it cannot be used for email marketing purpose again unless you instruct us otherwise.

If the data is not needed for some other purpose (e.g. to perform a contract with you or carry out our customer relationship), we will delete the data without undue delay.

All our marketing emails will have an Unsubscribe link and a link to our Preference Centre. You can easily withdraw consent for our marketing messages by clicking the 'unsubscribe' link at the bottom of each marketing email.

You can also alter and update your email marketing preferences for Kingspan Limited, withdraw your consent and change your topics of interest in the Email Preference Centre; this is accessible via a link in the footer of all marketing emails you received from us.

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.

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

The legal basis on which we collect and process your personal information for marketing purposes is either with your consent or for the purposes of our legitimate interests. We may also retain certain information (such as email address) if you have opted out of receiving marketing so that we do not send marketing to you contrary to your wishes and in which case we would retain that information to comply with our legal obligations.

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

We may share personal information we collect and hold for marketing purposes with third parties as follows:

- To receive services from our providers such as our IT service providers and therefore may access or receive personal information in the context of providing services to us;
- To our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice;
- 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 of all or part of our business;

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

We will only retain your personal information for marketing purposes as long as you are happy for us to send you marketing. If you opt out of receiving marketing from us, we will retain your email address so that we do not inadvertently send you marketing against your wishes. If you are an existing customer, we will also retain information for as long as necessary in connection with our provision of services to you. Please see our customer privacy notice for further information <https://www.kingspan.com/nz/en-nz/about-kingspan/kingspan-insulated-panels/customer-privacy-statement>

### **International data transfers**

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 New Zealand 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 information, 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 process 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 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://privacy.org.nz>

If you do have any concerns about how we process your personal information 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 [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.