



# PRIVACY POLICY

Reviewed September 2020

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## 1. Introduction

This privacy policy sets out how Sanford Limited (“**Sanford**”) will handle personal information it collects about you through the Sanford website, or where you interact with us via phone, email or post as a purchaser of our products or a supplier to our business. Sanford recognises the need for privacy and is committed to the protection of your personal information. All such information will be collected, stored, used and otherwise subject to the requirements of New Zealand privacy law.

## 2. Updates

Please note that Sanford may review and update this policy from time to time, by publishing an updated version on the Sanford website.

## 3. What is Personal Information

Personal information is, quite simply, information about an identifiable individual. Such information can range from a person’s name, to their contact details to other personal details.

## 4. Personal Information Collected and Held by Sanford

The type of information Sanford may collect and store from you will typically comprise:

- your name and address;
- your contact details, including telephone numbers and email address;
- a record of queries or complaints made and outcomes;
- information you provide us when entering competitions and prizewins.
- other information you provide us via phone, email or post;
- information from queries/inquiries you make;
- information you provide via our website, social media or mobile applications;
- information you enter as part of a purchase or order.

If you do not provide Sanford with the necessary personal information, Sanford may be unable to provide products or services to you. **[CT Note: we have included this sentence as the Privacy Act requires disclosure of consequences if users do not provide the requested personal information]**

## 5. Sanford's Use and Disclosure of Personal Information

Sanford uses personal information for a variety of purposes. Those purposes include:

- confirmation of your identity;
- disclosure of information to shareholders (where relevant to financial results or market announcements);
- responding to queries raised by you, and/or providing you with products or services you have ordered;
- to develop our understanding of our customers' preferences and interests;
- for development and optimisation of our website and/or our mobile applications;
- to comply with laws and court orders both in New Zealand and overseas, and to prevent fraud or other crimes;
- providing you with information as to products, services, publications, activities that may be of interest to you;
- contacting you with information about Sanford, special offers, samples, new products and newsletters;
- undertaking marketing, promotional, publicity, direct marketing or market research;
- to manage our relationship with you and exercise our rights.

Sanford may also from time to time disclose personal information to others, where Sanford believes this is appropriate to help us with any of the uses outlined above. That disclosure may be to our employees, contractors, advisers, agents, other companies within the Sanford group or to Sanford's business partners or third parties providing services to Sanford. Sanford will take reasonable steps to ensure that those recipients do not use that personal information for any other purpose other than the uses listed above.

Disclosure may also be made:

- as authorised by law or as necessary to enforce the law or this privacy policy;
- to enforcement/investigative authorities where it is suspected that unlawful activity has been engaged in;
- to protect personal safety or a threat to life or health;
- to facilitate court proceedings;
- to protect our company, our customers, or others;
- in other ways as permitted by the Privacy Act.

**[CT Note: we have deleted the reference to disclosure being made to mailing houses and credit agencies, as it is generally necessary to get specific consent from the individual in these circumstances. If disclosure to mailing houses, credit agencies etc occurs on a regular basis, we would suggest obtaining separate consent. ]**

## **6. Security of Personal Information**

Personal information may be stored by Sanford in hard copy and/or on computer databases.

Sanford will take reasonable steps and precautions to ensure that personal information which it collects is securely stored and protected against loss, interference, and unauthorised access, use, modification or disclosure. Nonetheless unauthorised access hacking of computers can occur.

You should however be aware that there is a residual risk in transmitting any data electronically and because the internet is an open network, Sanford cannot warrant or guarantee that your personal information is safe from unauthorised access or use.

Where Sanford discloses your personal information to a third party in accordance with this Privacy Policy, their use and maintenance of your personal information is outside Sanford's control and (to the extent permitted by law) Sanford accepts no responsibility or liability for such third party use.

## **7. Where Sanford receives information about others from you**

If you provide Sanford with personal information about someone else, you must ensure that you are authorised to disclose that information to us, so that, without Sanford taking any further steps required by applicable data protection or privacy laws, Sanford may collect, use and disclose such information for the purposes Sanford has described in this policy.

This means you must take reasonable steps when providing personal information so that the individual concerned is aware of and/or consents to this policy, including that:

- their personal information is being collected
- the purposes for which that information is being collected
- the intended recipients of that information
- the individual's right to obtain access to that information
- Sanford's identity, and how to contact Sanford.

## 8. Cookies

Sanford's website may use cookies, which may either be set by Sanford or set by third parties that Sanford allows to host cookies on its website. Cookies are small text files that are placed on a computer or other device when using a website. Sanford may use cookies to collect information about your use of the Sanford website, keep your personal information up to date, identify you if you return to the website, remember information about your preferences on the website and your online activity, provide you with personalised features, for security reasons, and for tracking traffic on our website. Some types of cookies are not automatically deleted when you stop browsing, but must be manually deleted if you want to remove them. You may alter your browser settings to prevent some cookies, but this may reduce the functionality of the website. You may be unable to make full use of the Sanford website unless you accept cookies.

## 9. Analytics

To improve the Sanford website and services, Sanford may use patterns and other meaningful information gathered from website analytics tools. This may include the timing and frequency of your use of the Website, your IP address, page requests, form requests, mouse click activity and other information that you voluntarily enter into the website.

In addition, Sanford may use third party cookies from third party services such as Google Analytics and/or Microsoft Application Insights. These services give Sanford insight into behavioural information relating to users interests in Sanford services, on an anonymous and aggregate level. This helps us to understand browsing behaviour to give a better experience whilst using Sanford services.

You can access Google's Privacy Policy [here](#) and Microsoft's Privacy Policy [here](#).

## 10. Access to, Viewing and Updating Personal Information

Sanford seeks to ensure personal information collected, used or disclosed is accurate and complete.

You are entitled to find out what personal information Sanford holds about you, request access to that personal information, and/or to request correction of that information. Please contact us if your details change or if you believe the information held about you is inaccurate or incomplete.

You may contact Sanford at [info@sanford.co.nz](mailto:info@sanford.co.nz) to seek details of/access to your personal information and seek an opportunity to correct/update that information. All requests will be considered but access may be declined for reasons set out in the privacy legislation. (A reasonable fee may apply to such access.)

## 11. Complaints, Inquiries and Mistaken Emails

You may contact Sanford at [info@sanford.co.nz](mailto:info@sanford.co.nz) if you are concerned about Sanford's use/treatment of your personal information.

Sanford will seek to handle any complaint in a timely, effective, fair and consistent manner. If your concerns cannot adequately be dealt with by Sanford then you may request Sanford to provide you with assistance in laying a complaint with the Privacy Commissioner.

In the unlikely event a mistaken email containing personal information is sent to an incorrect recipient, Sanford will use best endeavours to retract that email as soon as possible and will inform any affected party immediately.

## 12. Contact

If you need to contact Sanford regarding personal information held about you by Sanford please email us at [info@sanford.co.nz](mailto:info@sanford.co.nz).

## 13. Signed:



**R McLeod**  
**Chairman**



**A Gargiulo**  
**Acting Chief Executive Officer**

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