

At Lorraine Lea Linen Pty Ltd ABN 48 006 526 129 ("**Lorraine Lea**", "**we**", "**us**" and "**our**"), we recognise the importance of protecting your personal information. We are bound by the *Privacy Act 1988* (Cth) and the Australian Privacy Principles ("**APPs**").

This Privacy Policy sets out how we comply with the APPs. In particular, it sets out how we collect, use, disclose, dispose and otherwise deal with personal information which we may collect from you or which we may collect about you from third parties (such as independent Stylists).

By providing us with your personal information, you consent and agree to the privacy policy of Lorraine Lea as set out herein.

We reserve the right, at our discretion, to modify or remove portions of this privacy policy from time to time. Where we modify, amend or replace our privacy policy, the policy (as amended, modified or replaced) will be uploaded to Lorraine Lea's website in place of the superseded policy. We will use our reasonable endeavours to notify you of any changes to our privacy policy, but we recommend that you review this policy periodically to ensure that you are updated on any changes.

what personal information do we collect?

We may collect your personal information such as your name, date of birth, street and postal address, email address, age, gender, phone numbers, credit card details, occupation, personal interests and financial information for any goods and/or services you purchase from us.

When you apply to become an independent Stylist, we may collect information about you including your name, your phone number, your mobile phone number, your email address, driver licence number, bank account details, other contact details, and your location details. We may also collect information from you about the name, phone number, email address and other information related to the hosts and guests of parties which you hold or which you attend.

We may also collect information when you telephone us, including your name, your telephone number and your bank account information (when a refund is requested).

In limited situations, we may request that an independent Stylist provides us with information relating to allergies and existing health conditions, passport and visa information and emergency contact information.

anonymous or pseudonymous dealings with us

You do not need to provide us with your personal information and you may interact with us on an anonymous or pseudonymous basis.

However, if you choose to interact with us in such a fashion or if you do not provide us with your personal information when we request it to fulfil one or more of the purposes set out in this privacy policy for which the information is requested, then we may be unable to fulfil the purpose(s) for which the information is requested.

For example (but without limitation), we may be unable to complete the shipping of products you have ordered if you do not provide us with a name and shipping address, or we may be unable to complete a refund if you do not provide us with your bank account details.

Further, we may need to verify your identity as part of our response to a request to access and/or correct personal information we hold about you, or as part of our complaints-handling procedure if you wish to make a complaint to us about the manner in which we have dealt with your personal information.

If we are unable to verify your identity, or you continue to engage with us in an anonymous or pseudonymous basis, then we may be unable to complete your request or to complete our complaints-handling process.

how do we collect your personal information?

We collect your personal information using various means, such as:

- directly from you (e.g., through your interactions with our website, the completion of order forms you submit directly to us, through your completion of questionnaires that we ask you directly to complete, or when you register with us);
- from social media networks where we have a connection, e.g., Facebook, Instagram or Twitter;
- by your usage of our website (e.g., the pages that you visit and the links that you click);

- a telephone or in-person inquiry or discussion about our products, services and accounts, including the opportunity to become an independent Stylist;
- mail correspondence, emails or other electronic means; and
- publicly available sources of information.

We generally will only collect information about an individual directly from that individual, unless an exception under the *Privacy Act 1988* (Cth) applies. The main exception is that it is unreasonable or impracticable for us to collect personal information about an individual only from that individual.

In particular, we may collect personal information about you from third parties, such as independent Stylists, in certain situations (including when you place an order to purchase products with an independent Stylist or when you are applying to become an independent Stylist).

We may also collect data from our website using various technologies, including 'cookies'. A 'cookie' is a text file our website sends to your browser which is stored on your computer as an anonymous tag identifying your computer (but not you) to us. You can set your browser to disable cookies. However, some parts of our website may not function properly (or at all) if cookies are disabled.

In accordance with the requirements of the *Privacy Act 1988* (Cth) and the APPs, we only collect personal information from or about you only if it is reasonably necessary for one or more of our functions or activities. Additionally, we only collect personal information by lawful and fair means.

receipt of unsolicited personal information

We generally do not collect information on an unsolicited basis.

From time to time we may receive personal information about an individual without specifically asking for that personal information. For example, we may receive misdirected mail or an employment application sent to us on the initiative of the job applicant and not in response to an advertised vacancy.

Additionally, we may receive unsolicited personal information from an individual when we ask the individual to provide us with personal information and the individual supplies more than what we have requested from the individual.

Where we receive information on an unsolicited basis, we will comply with our statutory obligations to determine whether we could have lawfully collected the information for one or more of the purposes set out in this privacy policy and, subject to our statutory obligations, if we determine we could not have lawfully collected such information we will destroy or de-identify such information as quickly as reasonably possible.

If we determine that we could have lawfully collected the personal information we received on an unsolicited basis, then we will hold, use, disclose and dispose of that personal information in accordance with this privacy policy and our statutory obligations.

how do we use your personal information?

As a general principle, we only use personal information for the primary purpose(s) for which we collected the personal information or a secondary purpose related to the primary purpose for which you would reasonably expect us to use the collected information or otherwise as permitted by law (including the APPs).

We will take reasonable steps to make you aware of the purpose(s) for which the personal information we collect may be used by notifying you about all relevant matters before or at the time of collection, including by reference to this privacy policy.

We may use your personal information for one or more of the following purposes:

- to provide products and services to you or to a third party which may directly or indirectly benefit you;
- to better understand who purchases and uses our products and services which we offer (either directly, through an independent Stylist or through other means), those that access and use our website and the other social media and online channels that we currently or may in the future operate (including through market research in relation to our products and services);
- to better understand and to maintain and improve our relationship with current, prospective and former independent Stylists;
- to process your transaction and to administer your account with us, including by using your information to generate and send invoices, bills, statements of accounts, and related financial matters necessary to enable us to provide goods and/or services to you;
- to address and resolve queries, warranty claims and complaints in relation to us, an independent Stylist and/or the products and/or services we sell;
- to send information updates, marketing materials and newsletters to you (including marketing, advertising or otherwise promoting the opportunity to become a Stylist and our products and/or services);

- to seek and administer your participation (on a voluntary basis) in advertising campaigns, events, launches, customer testimonials and focus groups;
- to verify your identity and your registered user status;
- to facilitate an independent Stylist making contact with you if you have not been active as a Stylist and/or you have not recently purchased products or services from us for an extended period of time (unless you have specifically requested that you are not contacted by us or by a Stylist); and
- to improve our products and services, our website and your experience with us and with the independent Stylists generally.

Additionally, subject to our statutory obligations and in accordance with this policy, we may use the personal information you provide to us for the purpose of directly marketing us, the opportunity to become an independent Stylist and the products and/or services we sell and supply to you.

to whom may we disclose your personal information?

We may disclose the personal information we have collected from or about you to third parties, but only on an as-needs basis. These third parties may include:

- to independent Stylists;
- to third party software and marketing providers, including Pronto, Pronto Woven and Hubspot;
- to logistics companies for the purpose of shipping products to customers; and
- to our professional advisers.

As at the date of this Privacy Policy, we do not disclose personal information about an individual to a recipient which is located outside Australia.

We may disclose your personal information to third parties (including those listed above) for any of the purposes for which we may use your personal information. Additionally, we may disclose your personal information to third parties (including those listed above) for any of the following purpose(s):

- to comply with our obligations owed to you under any contract between us and you, or as required by law;
- to comply with our obligations owed to third parties under any contract between us and the third party where the completion of our obligations requires the disclosure of personal information we have collected to the third party;
- enabling those third parties to perform services on our behalf or to provide services to us, including transport and logistics services (transportation and delivery of products ordered from us), addressing and resolving warranty claims, sending correspondence and processing payments; and
- marketing us, our products and our services to you.

Without limiting the foregoing, we may from time to time disclose your personal information to our business partners, such as auditors, insurers and professional advisers (such as our legal and accounting advisers) for them to complete their obligations owed to us under agreements that we have entered into for the purpose of undertaking our business operations and activities. This information may include scrambled credit card details (although these will only be used with your consent for any transactions involving them).

In addition, we may disclose statistics (with personal identifiers removed) about our customers, readers, sales, traffic patterns and related site functions to reputable third parties primarily for the purpose of assisting us to improve our service offering.

We may disclose personal information about an individual when required by law or court order, or other governmental order or process to disclose, where we believe in good faith that the law compels us to disclose information, or where we are required to do so as a result of any obligations we owe under a contract.

We may disclose personal information about an individual to a third party if we consider it reasonably necessary to do so in order to identify, contact or bring legal action against any third party whom we suspect or know is causing harm to, or interference with our business, the products or services we provide, our information technology systems and equipment, or our property.

Personal information about individuals which we have collected may be disclosed to third parties in the event our business and/or assets are sold or offered for sale, at or before the time of a merger, acquisition or sale.

When we engage third parties to provide products and/or services to us, such third parties may have access to personal information we hold about individuals. We do not authorise those third parties to use any personal information disclosed to or accessed by the third party for any purpose other than to facilitate the third party's completion of its obligations it owes to us.

use of your personal information for the purpose of direct marketing

As noted above in our privacy policy, in accordance with the APPs, we may use or disclose your personal information for the purpose of directly marketing us, our products and services, and the opportunity to become an independent Stylist to you.

From time to time, subject to our statutory obligations and this privacy policy, we may send emails and other communications containing marketing materials or promotions of us, our products and services, and/or the opportunity to become an independent Stylist to you or otherwise directly market our products and services to you on the basis that you would reasonably expect us to do so, where we have collected your personal information from you directly.

Where we have collected personal information about you from a third party (such as, for example, an independent Stylist) then we will not use that personal information to directly market to you without your consent. Please note that we may seek your consent when you complete an order form that you then provide to an independent Stylist (and which the independent Stylist forwards to us) or when you complete an application form to become an independent Stylist which you then provide to an independent Stylist (and which the independent Stylist forwards to us).

However, you may at any time unsubscribe or opt out from receiving the marketing materials we directly send to you from time to time by using the tools we make available or otherwise by emailing us. Once we receive your opt out notification, we will promptly remove you from our mailing list.

When directly marketing to you, we will also comply with other laws relevant to marketing, including the *Spam Act 2003* (Cth), the *Do Not Call Register Act 2006* (Cth) and the *Competition and Consumer Act 2010* (Cth).

security and retention of the personal information

Here at Lorraine Lea, we take the security of your personal information seriously.

We take reasonable steps to protect any personal information which we hold from misuse, interference and loss. We also take reasonable steps to protect the information we hold from unauthorised access, modification and disclosure.

We take reasonable physical security measures and technological security measures in relation to the personal information we collect and hold. We regularly review and update our physical and technological security measures in light of current technologies and the requirements of applicable laws.

We only hold personal information we collect from or about an individual as long as is reasonably necessary to fulfil the purpose(s) for which the information was collected, as required by law or in accordance with our document retention policies. When it is no longer necessary to hold the information, then we will take reasonable steps to destroy or de-identify that information.

access to your personal information

Your privacy is very important to us and we take privacy very seriously.

If you have any concerns about your privacy or how we handle your personal information, then please contact us using the details set out at the end of this privacy policy. We will respond to your concerns as quickly as is reasonably possible.

Where you request access to the personal information we hold about you, then we will respond to your access request within a reasonable time period and we will give access to the information we hold about you in the manner you request, unless it is impracticable for us to do so.

Please note that we are entitled to charge you a reasonable fee for giving you access to the information you request.

Please also note that we are entitled under the APPs to refuse access to an individual's personal information we hold where any of the exceptions set out under the APPs exist in the particular circumstances. Should we refuse you access to the personal information we hold about you, we will explain the reasons for our refusal and, if you wish to lodge a formal complaint about our refusal, we will explain the complaint procedure.

Please note that we reserve the right to verify your identity before granting access to the personal information we hold about you in order to ensure that we are not inadvertently disclosing personal information to an individual not entitled to access such information.

Additionally, we reserve the right to redact the information we make available in response to an access request, in order to protect the privacy of other individuals.

accuracy of your personal information

We take reasonable steps to ensure that your personal information that we collect, use and disclose is accurate, complete and up-to-date.

However, the accuracy of the information we hold largely depends on the accuracy of the information that you have supplied to us (either directly or via a Stylist). If at any time any of your personal information changes or you discover that any information concerning you is inaccurate, out-of-date, incomplete, irrelevant or misleading, please contact us to correct the information.

In accordance with our statutory obligations, we will promptly consider and deal with any request we receive from you to correct the information we hold, subject to our verification of your identity and our review of our records to ascertain whether we in fact hold any personal information about you. In accordance with our statutory obligations, where we correct any personal information which we hold about you at your request, then we will take reasonable steps to notify any third parties to whom we may have disclosed that information about the correction to the information.

complaints and contacting us

If you wish to make a complaint to us about how we handle the personal information collected from or about you, then the complaint should be made in writing and addressed to the attention of our privacy officer (details of whom are set out below).

We will promptly acknowledge receipt and we will endeavour to deal with the complaint and provide a response to you within a reasonable time period following receipt (generally within 30 days of receipt).

Where the complaint requires a more detailed investigation, the complaint may take longer to resolve. If this is the case then we will endeavour to provide the complainant with progress reports.

We reserve the right to verify the identity of the individual making the complaint and to seek (where reasonable in the circumstances) further information from the complainant about the circumstances of the complaint.

Where required by law, we will provide our determination on the complaint to the complainant in writing.

We reserve the right to refuse to investigate or to otherwise deal with a complaint where permitted under the APPs, where such circumstances apply. For example (without limitation), we may refuse to investigate or to otherwise deal with a complaint if we consider the complaint to be vexatious or frivolous.

If you are not satisfied with the outcome of your complaint, then you may write to us seeking an internal review of our decision. Such internal review will be completed by an officer not previously involved in the complaint.

If you still remain dissatisfied following the outcome of the internal review, you may escalate your complaint to the Office of the Australian Information Commissioner.

If you have a query in relation to this privacy policy, or you wish to make a complaint, please contact:

The Privacy Officer
Lorraine Lea Linen Pty Ltd
27 Koornang Road
Scoresby VIC 3179
Phone: 1800 641 089
Email: support@lorrainelea.com