

# PRIVACY POLICY

**Protecting your privacy and the confidentiality of your personal information is very important to us. This Privacy Policy explains why we collect personal information and how we collect, use, disclose, store and protect your personal information. It also explains how you can access, correct, update or delete any personal information provided to us, or make a complaint if you have concerns.**

**We comply with all applicable privacy principles and laws which regulate how we collect, use, and protect your personal information. This Privacy Policy may change from time to time and is available on our website.**

## **WHICH COTTON ON ENTITIES DOES THIS PRIVACY POLICY COVER?**

This Privacy Policy applies to Cotton On Australia Pty Ltd (ABN 13 634 090 083), Cotton On USA Inc and all of their related entities and brands in the U.S. (referred to in this document as "we", "us" or "our"), including our U.S.-based businesses Cotton On, Cotton On Body, CO. by Cotton On, Free by Cotton On, Cotton On Kids, Rubi Shoes and Typo.

## **WHAT IS PERSONAL INFORMATION?**

Personal information is any information about an identifiable individual and so includes any information that can be used to identify you, such as your name, gender, date of birth, address, telephone number or email address.

## **WHAT PERSONAL INFORMATION DO WE COLLECT?**

We may collect personal information including your name, gender, date of birth, address, telephone number and email. Information about your computer hardware and software is also automatically collected when you use our website. This information can include your IP address, browser type, access times and/or referring website addresses. This information is used by us for the operation of the website and the services offered on the website and to maintain the quality of the services offered on the website.

We do not collect your financial information or retain credit card numbers used to purchase products or services as this information is processed by our financial institution that has its own privacy policy. If you receive a request to provide sensitive personal information (such as credit card details) in an email, do not provide this information because the request may be fraudulent. You can help us identify attempts at fraud - if anything suspicious occurs, please contact our Privacy Officer.

## **WHEN AND HOW DO WE COLLECT YOUR PERSONAL INFORMATION?**

### **General**

We collect most personal information directly from you when you consent to communications from us. Your consent will be express (e.g. you agree to the use of your information by ticking a box).

You provide us your information when you purchase (or inquire to purchase) products or services from us, you ask to find out more about our products or services, you participate in our competitions, you make a refund, return or other claim, you use our website(s) or other applications, you deal with us on the phone, you write to us, or when you visit one of our stores.

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## COOKIES

We may also collect information about how you use our website(s) or applications to help us better serve you. For example, we may do this when you click on a link from our website(s) or visit a website which displays our advertisements. This information is derived from cookies that identify the computer you used to access our website(s) or applications, and the cookies collect your server address; your top level domain name (for example .com, .nz, .gov, .au, .net, .edu, etc); the time and date of your visit to the website; the pages and documents you have accessed or viewed and the type of browser you are using.

When we use cookies and other tracking technologies to collect your personal and non-personally identifiable information we are collecting this information to: better understand your browsing and purchasing behaviour; analyse and track website usage data; determine the popularity of certain content; deliver advertising and content targeted to your interest on our website; better understand your online activity; improve our website and your online experience; count the number of visits; and for other legitimate internal business purposes (together “re-marketing, traffic, demographics and interest reporting purposes”).

We have engaged Google to provide advertisements on our behalf and to provide analytics services. Google may use cookies and other tracking technologies to collect non-personally identifiable information for re-marketing, traffic, demographics and interest reporting purposes via Google advertising cookies and anonymous identifiers. We have also engaged Rakuten to provide analytics services. Rakuten may collect personal information when you interact with our digital property, including IP addresses, digital identifiers, information about your web browsing and app usage and how you interact with our properties and ads for a variety of purpose, such as personalization of offers or advertisements, analytics about how you engage with websites or ads, and other commercial purposes. For more information about the collection, use and sale of your personal data and your rights, please use the below links:

- <https://rakutenadvertising.com/legal-notice/services-privacy-policy/>
- <https://rakutenadvertising.com/legal-notice/subject-requests/>

## WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

We may collect your personal information when required by law but generally we collect personal information from you (or about you) for the following business purposes and commercial purposes:

### Business Purposes:

- to enter into a contract with you to supply you with goods purchased (including goods purchased via click and collect);
- to supply you with tailored products, services or offers that may benefit you;

### Commercial Purposes:

- to better communicate with you;
- to improve your experience with us;
- to notify you about our new products and services, discounts, promotions or upcoming events; and
- for re-marketing, traffic, demographics and interest reporting purposes.

Personal information we collect or receive will only be used for the stated purpose for which it was provided. We do not sell your personal information to third parties.

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## **WHAT IF YOU DON'T WANT US TO COLLECT YOUR PERSONAL INFORMATION?**

You do not have to provide us with any personal information unless you want to. For example, it is your choice as to whether you purchase our products or services or receive communications from us. If you choose not to provide us with your personal information, we may be unable to provide a product or service or deal with you.

When you use our website or a web browser to search for our website or products, you can set your web browser to remove or reject cookies by selecting the appropriate settings on your browser. If you wish to opt-out of having your web browsing information used for re-marketing, traffic, demographics and interest reporting purposes, you must download and install [Google Analytics Opt-out Browser Add-on](https://tools.google.com/dlpage/gaoptout) (<https://tools.google.com/dlpage/gaoptout>). Removing or rejecting cookies may affect the availability and functionality of our website and updates to your web browser may affect the functionality of the Google Analytics Opt-out add-on.

## **WHAT IF YOU DON'T WANT TO RECEIVE ANY FURTHER COMMUNICATIONS FROM US?**

At any time you can unsubscribe from marketing communications via the unsubscribe link in the footer of any of our emails.

## **WHEN DO WE DISCLOSE YOUR PERSONAL INFORMATION?**

Your personal information will not be used contrary to this Privacy Policy but we may disclose your personal information to third parties:

- for the purpose it was collected – for example, to supply to you, respond to you and to operate our businesses;
- if we sell all or part of our business(es) and the buyer also requires your personal information;
- to enforce our legal rights or those of others;
- to prevent actual or potential fraud or illegal activity;
- who provide services to us ranging from technology, data storage, website hosting, marketing, operations and customer service; or
- if we are required to do so by law.

If personal information is disclosed to a third party, we are required to take reasonable steps to ensure your personal information is treated in accordance with all applicable privacy principles and laws. Some of our suppliers, who provide services to us, may be located overseas and at present we have servers in Australia, Singapore and the USA hosting our website(s).

## **HOW CAN I ACCESS, CORRECT, UPDATE AND/OR DELETE PERSONAL INFORMATION YOU HAVE COLLECTED?**

You may request access to your personal information we have by contacting our customer relations team (via chat, email or our toll-free number) or Privacy Officer. We will provide you with access once you have verified your identity.

If your personal information is incorrect or you wish us to delete it or transfer it to another entity identified by you, you can unsubscribe online, contact our customer relations team (via chat, email or our toll-free number) or contact our Privacy Officer using the details below.

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## NOTICE FOR CALIFORNIA RESIDENTS

California residents may take advantage of the following rights:

- You may request, up to two times each year, that we disclose to you the categories and specific pieces of personal information that we have collected about you, the categories of sources from which your personal information is collected, the business or commercial purpose for collecting your personal information, the categories of personal information that we disclosed for a business purpose, any categories of personal information that we sold about you, the categories of third parties with whom we have shared your personal information, and the business or commercial purpose for selling your personal information, if applicable.
- You may request that we delete any personal information that we have collected from or about you. Note that there are some reasons we will not be able to fully address your request, such as if we need to complete a transaction for you, to detect and protect against fraudulent and illegal activity, to exercise our rights, or to comply with a legal obligation.

To take advantage of these rights, please contact our customer relations team (via chat, email or our toll-free number) or contact our Privacy Officer. We may ask you questions to verify your identity in order to process your request. We will respond to your request within 45 days of receipt of your request, after proper verification, unless we need additional time, in which case we will let you know.

We will not discriminate against you for your exercise of your rights under California law.

For purposes of compliance with the California Consumer Privacy Act, in addition to the further details as described throughout this Privacy Policy, we make the following disclosures:

- We collect the following categories of personal information:  
Identifiers/Contact Information, Characteristics of Protected Classifications Under Federal and State Law, Commercial information, Internet or other electronic network activity information, and inferences drawn from the above.
- We disclose the following categories of personal information for a business purpose:  
Identifiers/Contact Information, Characteristics of Protected Classifications Under Federal and State Law, Commercial information, Internet or other electronic network activity information, and inferences drawn from the above.

## HOW DO WE STORE AND PROTECT YOUR PERSONAL INFORMATION?

We have appropriate measure in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. Your personal information may be stored by us in various forms including both electronic and hardcopy. You should be aware that there are inherent risks associated with the transmission of personal information via the internet, however, we will take reasonable steps to maintain the integrity and security of any personal information we have stored, including taking reasonable steps to prevent interference and loss, misuse, unauthorised access, modification or disclosure of such personal information. Information may be held at our offices and those of our member companies, third party agencies, service providers and representatives and agents of the above.

It is important that you protect your privacy by ensuring that no one obtains your personal information and you must contact us if your details change. If you do not wish to use the internet to transmit personal information you can mail or phone the Privacy Officer using the details below. If we no longer require your personal information for the purposes stated in this Privacy Policy or we have received it inadvertently, we will take reasonable steps to securely destroy or de-identify it as soon as practicable, as long as it is lawful to do so.

We keep your personal information that we obtain about you for no longer than is necessary for the purposes for which it is processed. How long we keep it will depend on the nature of information, the purpose for which it is processed and whether you chose to unsubscribe from our communications.

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If we no longer require your personal information for the purposes stated in this Privacy Policy or we have received it inadvertently, we will take reasonable steps to securely destroy or de-identify it as soon as practicable, as long as it is lawful to do so.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulatory authority of a suspected data security breach where we are legally required to do so.

## **OUR POLICY TOWARDS CHILDREN**

We do not knowingly collect personal information from children under 13. In the event that a child under 13 tries to sign up to our databases, we will block that sign up. If we learn that we have collected personal information of a child under 13, we will delete that information.

## **DO YOU HAVE ANY QUESTIONS OR CONCERNS?**

If you have any questions about our Privacy Policy or if you have a complaint, please contact us with your concerns and we will endeavour to respond to your request within 30 days.

**Mail:** The Privacy Officer, Cotton On Group, 14 Shepherd Court, North Geelong, Victoria 3215

**Chat/Webform:** Via our [Help Centre](#)

**Email:** [privacyofficer@cottonon.com](mailto:privacyofficer@cottonon.com)

**Toll-free number:** 1 (844) 319-5970

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