

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 the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) and all other applicable privacy laws. 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) and all of its related entities and brands in Australia (referred to in this document as "we", "us" or "our"), including Cotton On, Cotton On Body, Cotton On Kids, Rubi Shoes, Factorie, Typo and Supré.

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 the following types of personal information:

- Identity and contact details, including your name, gender, date of birth, address, telephone number and email address;
- Payment and transaction details, including information about products you have purchased from us or enquired about, but we do not collect your financial information or retain credit card numbers used to purchase products or services as this information is collected by a financial institution that has their own privacy policy; and
- Digital information including your IP address, browser type, access times and/or referring website addresses.

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.

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) to allow us to:

- Conduct business operations, including to manage our relationship with you as a customer or supplier, process and deliver our products, and handle your enquiries;
- Communicate and support you, including to respond to your support requests and communicate important updates about our products and services;
- Improve our services, including conduct analytics and market research.
- Conduct marketing and promotions, including to supply you with tailored products, services or offers that may benefit you, manage your marketing preferences, and, for re-marketing, traffic, demographics and interest reporting purposes (see more about cookies below);
- Employment purposes, including to assess employment applications and evaluate candidate qualifications; and
- Comply with our legal obligations.

Personal information collected or received by us will only be used for the stated purpose for which it was provided.

WHEN AND HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect most personal information directly from you when you consent to communications from us. Your consent may be express (e.g. you agree to the use of your information by ticking a box) or implied by an action you take or do not take (i.e. because you have agreed to terms and conditions that contain information about the use or disclosure of your information). You provide us your information when you purchase (or enquire to purchase) products or services from us, you ask to find out more about our products or services, you apply to work with us, 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.

We may also collect your personal information:

- Automatically when you visit our website, use our technologies or interact with our online services;
- From third parties such as service providers, business partners, government organisations and organisations or people authorised by you; and
- From publicly available sources.

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. If you have consented ("opted-in") in accordance with privacy principles, your personal information may be merged with non-personally identifiable information collected through any Google advertising product or feature to be used by us for re-marketing, traffic, demographics and interest reporting purposes.

We also use Meta's advertising tools (such as Meta Pixel) to understand how our advertisements perform and to show you more relevant advertisements on Meta platforms like Facebook and Instagram when you visit our website or app. You can manage whether we connect information from our website with your Meta account for advertising purposes by adjusting your settings within your Meta account preferences.

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 manage your personal information by:

- Setting your web browser to remove or reject cookies by selecting the appropriate settings on your browser;
- Using our cookie preference settings;
- Downloading and installing [Google Analytics Opt-out Browser Add-on](https://tools.google.com/dlpage/gaoptout) (<https://tools.google.com/dlpage/gaoptout>) if you wish to opt-out of having your web browsing information used for re-marketing, traffic, demographics and interest reporting purposes; and
- Managing whether we connect information from our website with your Meta account for advertising purposes by adjusting your settings within your Meta account preferences.

Please note that 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. You can also change your marketing preferences by contacting our Privacy Officer directly. We will process your request as soon as practicable.

Please note that even if you opt-out of receiving marketing communications, we may still need to contact you for other purposes such as responding to your enquiries or providing you with important information about your purchases or account.

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 including:

- Service providers such as IT service providers, web hosting and server providers, payment processors, and marketing and advertising providers;
- Professional advisers such as auditors, legal advisers, and insurers;

- Our existing or potential agents, business partners or contractors;
- If we merge with or are acquired by another company, or sell all or part of our business(es), your information may be disclosed to our advisers and the potential purchaser's advisers and may be included in the transferred assets;
- Legal and regulatory bodies;
- Third parties you have authorised; and
- Any other parties as required or permitted 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. Before disclosing your personal information to overseas recipients, we take reasonable steps to ensure that the recipient treats your information in accordance with applicable law by:

- Only sending what is necessary;
- Requiring recipients to protect your information through contractual agreements which require the recipient to comply with applicable privacy standards; and
- Monitoring how recipients handle your information.

Some of our suppliers, who provide services to us, may be located overseas and at present we have servers in Singapore and the USA hosting our website(s).

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

You have the following rights in relation to the personal information we hold about you:

Access - You may request access to your personal information we have by contacting our Privacy Officer. We will respond to your request within a reasonable timeframe and will provide you with access once you have verified your identity.

We may charge a reasonable administrative fee for providing access. If we are unable to provide access, we will explain why in writing and explore alternative ways to share the relevant information with you.

Correction - You may ask us to correct any personal information we hold about you that is inaccurate, out of date, incomplete, irrelevant or misleading. We will take reasonable steps to correct your information promptly. If we are unable to make the correction, we will explain why in writing. You may also ask us to add a statement to your information noting your requested correction.

HOW DO WE STORE AND PROTECT YOUR PERSONAL INFORMATION?

We have appropriate measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised 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.

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. We keep your personal information that we obtain about you for no longer than is necessary for the purposes for which it was collected, or as required by law. 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.

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. Please note that any information you choose to share publicly on online platforms (such as comments or reviews) can be accessed and used by others. We cannot control or protect information that you make publicly available.

USE OF ARTIFICIAL INTELLIGENCE (AI) TECHNOLOGIES

We use artificial intelligence and machine learning technologies in our business operations and services, including AI tools provided by third parties. We only use these technologies when legally permitted and necessary for our business.

We may use AI technologies to conduct analysis and data processing, improve and optimise our services and operations, and assist with customer support and queries.

Any information generated or inferred about you by AI technologies is treated as personal information and you maintain all the rights outlined in this Privacy Policy. When using AI with your personal information we commit to:

- Maintaining human oversight and review of significant AI generated decisions;
- Using appropriate technical and organisational measures to maintain the security and integrity of your personal information; and
- Regularly assessing risks associated with using AI to process personal information.

When we work with third party AI providers, we ensure they handle your personal information in accordance with the *Privacy Act 1988* (Cth) through contractual requirements and appropriate safeguards.

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.

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

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

Email: privacyofficer@cottonon.com

We will verify your identity, investigate your complaint and respond to you in writing within a reasonable time. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au or on 1300 363 992.

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