

# THIRSTY CAMEL LIMITED PRIVACY POLICY

Thirsty Camel Limited (“**TCL**”) is bound by and complies with the privacy laws, codes and regulations in New Zealand, including the Privacy Act 2020 (the "**Privacy Act**"). Our policy for collecting, using, disclosing and storing personal information that we collect is outlined below.

## **Information we collect**

We may collect the following types of personal information about you for the purposes set out in this policy:

- Contact information such as your name, date of birth, telephone number, postal address and e-mail address.
- Other information which will assist TCL in conducting its business and to provide its products and services.
- Information about your device (such as your IP address, device identifier and device type) and use of any TCL websites (such as how often you visit).
- Personal information provided in connection with your entry into or interaction with TCL's promotions and competitions.
- Information related to your employment or potential employment with us, such as job title and function, and business area and location.
- Information to help us understand more about our staff, including to understand the diversity of our workforce and ensure we are supporting a diverse and inclusive workplace (for example, this may include gender information).

If you do not provide information when requested to do so, depending on the nature of the information and our relationship with you, we may be unable to provide services to you, or offer employment.

## **How we collect information**

TCL may collect any personal information about you when you:

- Contact us directly, such as when you enter a promotion, fill in a form or send us an email.
- Use this website.

- Participate in any surveys, promotions or competitions.
- Order products from us.
- Apply for a job with us.
- Otherwise interact with us.
- For other business initiatives as described when collecting your personal information or any specific purpose not listed above with your consent or as otherwise permitted by law.

Where possible, we attempt to collect personal information about an individual solely from that individual, however, at times we may be supplied with personal information by a third party, including:

- Our advertising agencies and other business partners who liaise with you on our behalf.
- Credit reporting agencies where you have authorised us to conduct credit checks.
- Our related bodies corporate, provided such collection is in accordance with the Privacy Act.

If you supply us with personal information in relation to another person, we require that you advise the person that you have done so and ensure that they agree to the use and disclosure of their personal information in accordance with this Privacy Policy.

### **How we use this information**

- Your personal information is used for the purpose you provided it for, any other purpose you consented to plus any directly related purposes or other purposes permitted under the Privacy Act. This may include:

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- To provide products or services to you.
- To accept entries into promotions and competitions.
- To undertake credit checks of you when we have obtained your consent to do so.
- To assess employment applications.
- Managing your employment or potential employment with us, including on-boarding, off-boarding, managing performance and learning about our workforce.

- To conduct statistical analysis.
- To monitor diversity and inclusion within TCL and its wider corporate group and to ensure we are supporting a diverse and inclusive workplace. For example, this could include measuring gender pay equity.
- For complaints handling.
- For contractual obligations
- To comply with various legislative requirements.
- For internal administration purposes.
- For marketing purposes where you have specifically consented to receive marketing communications from us.

TCL may also collect the following information to generally improve this site and tailor content:

- Your server address.
- Domain name.
- The date and time of your visit to our site.
- The pages viewed and information downloaded.
- The previous site visited.
- The type of browser used.
- No attempt will be made to identify users by their browsing activities.

We do not sell any personally identifiable information to any third parties.

### **Disclosure of Personal Information**

We may share your personal information with any of the following:

- Other companies or individuals who assist us in providing products or services or who perform functions on our behalf (such as IT providers, marketing companies, mailing houses, consultants, credit providers and service providers).

- Our third party service providers (including web services and cloud storage/hosting providers) where that disclosure is reasonably required to fulfil any purpose for which your personal information was collected.
- "Related" bodies corporate to TCL.

We may also disclose personal information where:

- We are required or permitted to do so by law.
- You have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances.

For the purposes set out above we may transfer personal information to parties located in other countries (some of which may not have an equivalent level of data protection laws as those in New Zealand). Before transferring any personal information to an overseas recipient, we take steps that are reasonable in the circumstances to ensure the overseas recipient complies with the principles contained in New Zealand's Privacy Act or is bound by a substantially similar privacy scheme unless you consent to the disclosure or it is otherwise required or permitted by law.

### **Security and Accuracy of Personal Information**

We are committed to keeping personal information secure. We will use reasonable precautions to protect personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

Although we will take all reasonable steps to secure our websites, the internet is not a completely secure medium and we are unable to guarantee that any information that you post on or transmit through our websites will be safe from unauthorised access or use.

You have a right to request access to, and correction of, personal information we hold about you. To make a request, send an e-mail to us at [info@thirstycamel.co.nz](mailto:info@thirstycamel.co.nz) or call us on 0800 THIRSTY (844778).

Any change relating to credit eligibility information or credit information must be submitted in writing to [tcl-invoices@campari.com](mailto:tcl-invoices@campari.com)

We will take such steps that are reasonable in the circumstances (if any) to destroy or de-identify personal information when it is no longer required.

## **Cookies**

Cookies are uniquely numbered identification numbers like tags which are placed on your browser. By themselves cookies do not identify you personally, but they may link back to a database record about you. If you register on any of our websites we may then link your cookie back to your personal identification details.

If you choose to disable or block cookies, parts of our website may not function as intended, or at all. Cookies can be disabled or blocked through your browser settings.

## **Links to other sites**

Our website contains links to other sites. You should consult the other sites' privacy notices to find out how they process your personal information. Where cookies hold any personal information, those cookies will be handled in accordance with this Privacy Policy. Their information practices may be different than ours and we have no control over information that is submitted to, or collected by, these third parties. TCL cannot accept any responsibility or liability for the privacy practices of third party websites and your use of those websites is at your own risk.

## **Changes to our Privacy Policy**

We reserve the right to revise our Privacy Policy, or any part of it, from time to time. Please review the policy periodically for changes.

## **If you have a complaint or a question**

If you would like further information about how we manage your personal information, or if you have any queries relating to our Privacy Policy, or have a problem or wish to lodge a complaint in relation to an alleged breach of the Privacy Act, please contact us:

Attention: Privacy Officer  
Thirsty Camel Limited  
Level 2, 2 Landing Drive  
Mangere, Auckland

Telephone: 0800 THIRSTY (844778)  
Email: [info@thirstycamel.co.nz](mailto:info@thirstycamel.co.nz)

If you feel that your privacy has been breached or have any questions about TCL's Privacy Policy, please contact the Privacy Officer (see contact details above). Details in relation to any breach will need to be provided to you.