

Legrand Privacy Policy

Privacy Act 1988 (Cth)

This Privacy Policy applies to all your dealings with Legrand Australia Pty Ltd and related Legrand Group entities which may carry on business activities in Australia such as Legrand France, BTicino and Legrand North America (hereafter collectively referred to as “Legrand”) in relation to personal information they obtain, to the extent that the *Privacy Act 1988 (Cth)* (“the Act”) and the Australian Privacy Principles (“the APPs”) applies to that personal information.

“Personal information” is defined under the Act as meaning ‘information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not’.

Our Credit Reporting Policy applies specifically to credit related personal information to which Part IIIA of the Act applies. A copy of our Credit Reporting Policy can be obtained on our website at www.legrand.com.au.

General Data Protection Regulation (EU) 2016/679

The collection, control and processing of “personal data” of individuals in the European Union (“EU”) may also in some circumstances be subject to the General Data Protection Regulation (EU) 2016/679 (“GDPR”). To the extent that the GDPR applies to any personal data of individuals in the EU collected by Legrand Australia Pty Ltd, this Privacy Policy shall also apply.

“Personal Data” is defined under Article 4 of the GDPR as meaning any information relating to an identified or identifiable natural person who can be identified, directly or indirectly by reference to an identifier such as name, identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal Information and/or Personal Data is referred to herein as “personal information”.

Your acceptance of this Privacy Policy

By using this website or entering into contracts with us or otherwise providing us with your personal information, you agree to the terms of this Privacy Policy. Depending on the manner in which you communicate with Legrand, further privacy information may apply in addition to the matters discussed in this Privacy Policy.

From time to time Legrand may update this Privacy Policy. When changes are made, we will revise the date of last update listed at the end of this Policy. We encourage you to check our website regularly for any updates to our Privacy Policy.

Links

Our website may contain links to other websites. Legrand is not responsible for the practices employed by websites linked to, or from, our website. We encourage you to be aware of when you leave our website, and to read the privacy policies of all websites.

What kinds of information do we collect and hold?

Personal Information/Personal Data

Legrand only collects and holds personal information where the information is reasonably necessary for one or more of our functions or activities. To the extent that the information falls within the above definitions of Personal Information or Personal Data, the Personal information or Personal Data collected may include:

- your personal details such as your name, date of birth and gender; bank account details, employment details;
- contact details including: home address, email address; telephone number;
- user IDs and passwords;
- IP address, domain name,
- records of communications between Legrand and yourself;
- usage information;
- geo-location and layout of home (names of modules, floors, type and on/off status & battery level of equipment, electricity consumption) which may be collected when using Legrand's Apps;
- and any other information disclosed by you.

Sensitive information

Legrand only collects and holds sensitive information about you where you consent to the collection of the information and the information is reasonably necessary for one or more of our functions or activities. The kinds of sensitive information that may be collected about you include information revealing membership of a professional or trade association or union membership.

How do we collect and hold your personal information?

Legrand collects and holds personal information in a variety of ways. For example, personal information may be collected:

- when you or your business enter into business transactions with us,
- when you fill out a form, deal with us over the phone, send us a letter, send us an email,
- when orders are made; when accounts are established, when purchases or refunds are made, and in connection with other services and activities we make available;
- when you visit our website, when you submit your email address to our website mailing list;
- when you apply for a job or make an employment-related inquiry,
- when register with us,
- when you download our Apps or register to use the Apps; and
- from publically available sources.

Legrand will collect personal information directly from you where it is reasonable and practicable to do so. Sometimes we may be required to collect information about you from a third party, such as our contractors and agents, referees or from publicly available sources.

You may visit our website anonymously, or by using a pseudonym, and can refuse to supply personal information where it is lawful and practicable to do so. However, if you do so it may prevent you from engaging in certain activities and services with Legrand.

Unsolicited information

If Legrand receives unsolicited personal information and we determine that we could not have collected the personal information from you, and the information is not contained in a Commonwealth record, we

will, as soon as practicable but only if it is lawful and reasonable to do so, destroy or de-identify the information.

Passive information collection

Legrand uses various technologies, such as cookies, to collect anonymous information from users of its website. This information helps us analyse website traffic and guide development of the website. Most web browsers automatically accept cookies but you can modify your browser settings to disable them. If you do so, some parts of the website may not function properly.

Why do we collect, hold, use and disclose your personal information?

Legrand collects, holds, uses and discloses personal information:

- for the purpose for which it was collected,
- for any purpose to which you have consented to, or
- for any related purpose where you would reasonably expect us to use or disclose the information.

Such purposes are varied and may include:

- supplying products and services
- undertaking and completing transactions with parties with whom we do business,
- meeting our legal and regulatory requirements;
- providing customer support;
- improving customer service;
- developing, researching, improving, distributing and marketing our products;
- performing internal administration; and
- maintaining business relationships to enable us to carry on our business.

How do we use and disclose your personal information?

Disclosure of personal information to third parties

In the course of business, we may be required to disclose personal information to third parties. The types of third parties we may disclose your personal information to include:

- our insurer, regulatory bodies, government agencies, law enforcement bodies, Courts or other parties we are authorised or required by law to disclose information to;
- and our agents, contractors and external advisors who we engage to undertake our business functions and activities from time to time or who assist us in undertaking our business functions and activities.
- the data may also be processed, on behalf of Legrand, by external parties designated as external data processors, including, without limitation:
 - third-party IT service providers and IT support providers that are engaged to carryout the above activities;
 - other Legrand Group companies, for the above purposes.

Legrand may sell, buy or merge or reorganize its businesses and such transactions may involve the disclosure of personal information to purchasers or prospective purchasers or receiving personal information from sellers.

Cross-border disclosure of personal information

In conducting our business, Legrand may be required to disclose personal information to third parties operating outside of Australia, including Legrand's related overseas entities. The countries in which these recipients may be located will vary from time to time, but may include New Zealand, France and other European countries, the United States of America, and any other countries where Legrand or its related entities have a presence or engages third parties.

- **Personal Information to which only the Privacy Act 1988 applies:**

Under APP 8.1 an 'Australian Privacy Principles entity' ("APP entity") (as defined by the Act) that discloses Personal Information to an overseas recipient has an obligation to ensure that the recipient does not breach the APPs in relation to the information unless the APP entity reasonably believes that the overseas recipient is subject to similar privacy laws applies under the Act. The obligation under APP 8.1 does not apply to an APP entity if the APP entity expressly advises the individual of its obligations under APP 8.1 and the individual consents to those obligations not applying to the APP. Legrand expressly advised you that if you consent to obligations under APP 8.1 not applying to Legrand and the overseas recipient of personal information handles the personal information in breach of the APPs:

- Legrand will not be accountable under the Act;
- you will not be able to seek redress under the Act;
- the overseas recipient may not be subject to any privacy obligations or to any principles similar to the APPs;
- you may not be able to seek redress in the overseas jurisdiction;
- the overseas recipient is subject to a foreign law that could compel the disclosure of personal information to a third party, such as an overseas authority.

Your continued use of this website and your continued dealings with us constitutes that consent to Legrand that its obligations under APP 8.1 in respect of your personal information disclosed to overseas entities shall not apply. You may request Legrand not transfer our personal information to other countries, but if you do so we may not be able to provide the products or services to you.

- **Personal Data of individuals in the EU to which the GDPR applies:**

Personal Data from individuals in the EU may be transferred to an overseas country in the following circumstances:

- Where the EU Commission has determined the overseas country provides an adequate level of data protection (Article 45); or
- If there has been no such determination by the EU Commission, where an individual's enforceable rights and effective remedies are available and where appropriate safeguards are in place such as (Article 46):
 - approved binding corporate rules that enable transfers within a corporate group are in place;
 - agreement that contains the standard data protection clauses adopted by the EU Commission or a data protection authority are in place;
 - approved codes of conduct or certifications are in place and the recipient gives binding and enforceable commitments to apply appropriate safeguards; or
- Where you explicitly consent to the proposed transfer after you have been provided with information about the possible risks associated with the transfer (Article 49).

Online Apps

Some of Legrand's products may require software apps ("Apps") to be downloaded from overseas Legrand entities such as Legrand France, BTicino in Italy or Legrand North America to use in conjunction with the products. You may be required to provide personal information to that overseas Legrand entity in order to download the App or to register to use the App.

To the extent that the Act applies to that personal information, this Privacy Policy will apply. Individuals in Australia who download an App from an overseas Legrand entity:

- (i) acknowledge that your personal information collected by the overseas Legrand entity may be held, depending on the entity, in France, Italy other countries in the European Union; in North America or any other country referred to in the overseas Legrand entity's privacy policy provided to persons when downloading the App;
- (ii) consent to any personal information collected by the overseas Legrand entity being held by or on behalf of the overseas Legrand entity in such countries; and
- (iii) consent to the collection, use and disclosure of your personal information by the overseas Legrand entity for the purposes set out in the overseas Legrand entity's licence agreement or terms of use of apps and privacy policy provided to person when downloading the App and any other purpose described in this Privacy Policy.

How do we market our products and services?

From time to time, Legrand may use or disclose your personal information to inform you about our products and services. If you are in the EU and the GDPR applies, this will be subject to your express consent. If you do not wish to receive marketing materials from Legrand, you may opt-out at any time by contacting the relevant Legrand Privacy Officer, contact details below.

How do we protect your information?

Legrand maintains appropriate security, data collection, storage and processing practices to ensure reasonable steps are taken to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. Where this information is no longer required, Legrand will take reasonable steps to destroy or de-identify the information.

How can you access or correct your personal information under the Act?

Accessing your personal information

To access the personal information we hold about you, please send a written request to the relevant Legrand Privacy Officer, contact details below. Generally, Legrand will try to grant access to the personal information. We may charge for giving access to the personal information.

Legrand may refuse to give access to the personal information where for example giving access would disclose commercially sensitive information or information relating to existing or anticipated legal proceedings. If we refuse to provide you with access to personal information held about you by us, then we will provide written reasons for the refusal and advise you of available avenues of redress.

Correcting your personal information

Where necessary, Legrand takes reasonable steps to ensure the personal information we collect and disclose is accurate, up-to-date, complete and relevant.

If it discovers the information is inaccurate, out of date, incomplete, irrelevant or misleading, Legrand will take reasonable steps to correct the personal information. If you find that information we hold about you is incorrect, please request its correction free of charge by contacting the relevant Legrand Privacy Officer, contact details below. In your request for correction, you can request that we notify any other APP entity of the correction if successful. If we refuse your request for correction, we will provide written reasons for the refusal and advise you of the mechanisms available to you to complain about the refusal.

How can you complain about a breach of the Act?

If you believe an act or practice Legrand has engaged in has breached the Act, you can lodge a complaint free of charge by contacting the relevant Legrand Privacy Officer, contact details below.

If you are unhappy with our resolution of your complaint or with the way Legrand has handled your complaint, you may be able to refer to the matter to the Office of the Australian Information Commissioner (“the Commissioner”) (see <http://www.oaic.gov.au> for further details).

How do you contact us in relation to privacy matters under the Act?

For privacy issues relating to Legrand Australia, please contact Legrand Australia’s Privacy Officer: privacy-officer.au@legrand.com.au

Privacy issues relating to any other Legrand entity must be directed to the privacy officer for the relevant entity:

-For Legrand France, please contact Legrand France’s Privacy Officer: using the contact form at the following address: <https://www.legrand.com/en/contact>.

-For Legrand North America, please contact Legrand North America’s Privacy Officer: marketing.group@legrand.us.

-For BTicino, please contact BTicino’s Privacy Officer: privacy@pec.bticino.it.

Legrand Australia’s Collection of Personal Data from individuals in the European Union (EU)

In addition to the above, to the extent that Personal Data is collected, controlled or processed by Legrand Australia Pty Ltd from individuals in the EU and the GDPR applies, the following shall also apply:

Identity of Controller

All processing of Personal Data collected is performed under the responsibility of Legrand Australia (hereafter referred to as “the Controller”).

Specific Rights under the GDPR

With regard to the processing of your Personal Data by the Controller, you have the right:

- to request access to, erasure of and rectification of Personal Data;
- to have incomplete personal data completed;
- to request restriction of processing in the cases listed under Article 18 of the GDPR;
- to object to processing, for reasons connected to your specific situation, in the cases where a legitimate interest is being pursued by the Controller;
- where processing is based on consent or on a contract and is carried out by automated means, you have a right to receive a copy of your data in a structured, commonly used, machine-readable format, and, if technically feasible, to transmit it to another controller; and
- you have the right to lodge a complaint with the relevant EU Data Protection Authority at any time, as well as to seek any other remedies available under the applicable law.

In order to exercise your rights, you may contact the Controller by sending a written communication to the Legrand Australia, Blg 4/43-47, Lyn Parade, Prestons NSW 2170 Australia, or email to Legrand Australia’s Data Protection Officer at privacy-officer.au@legrand.com.au

Personal Data of Children under the age of 16

Legrand Australia does not intentionally collect person information from individuals who are under the age of 16. If we learn that any personal information submitted to us is information of a child under 16 we will attempt to delete the information as soon as possible. If you believe we may have any personal information from a child under 16, please contact Legrand Australia’s Data Protection Officer, privacy-officer.au@legrand.com.au

This Privacy Policy was last updated May 2019.