Pringles' Privacy Policy

Last updated: September 2020

About this policy

Pringles International Operations SARL (ABN 53 153 949 430) ("Pringles") is bound by (to the extent applicable):

- the Australian Privacy Principles ("APPs") and complies with the APPs as required by the Privacy Act 1988 (Cth) ("AU Privacy Law"); and
- the New Zealand Information Privacy Principles ("IPPs") and complies with the IPPs as required by the Privacy Act 1993 ("NZ Privacy Law").

Pringles is committed to protecting and maintaining your privacy. This Privacy Policy describes the types of personal information we may collect, and how we use, hold and disclose this personal information. This Privacy Policy also sets out how you can contact us to access or correct your personal information, ask questions or make a complaint.

For visitors to our website including any of our mobile sites, and users of any of our downloadable apps, this Privacy Policy forms part of the <u>Terms of Use</u>. You should read this statement in conjunction with the <u>Terms of Use</u>.

This Privacy Policy includes examples but is not intended to be restricted in its application to such examples. Accordingly, where the word 'including' is used, it will mean 'including without limitation'.

From time to time, our information handling processes will be reviewed and updated, and we will update this Privacy Policy accordingly. Pringles will notify you of any updates to this Privacy Policy by posting an updated version of the Privacy Policy on our website. Please check this Privacy Policy periodically for updates. Alternatively, you can contact us (see below) to receive an updated hard copy.

All personal information held by Pringles will be governed by Pringles' most recent Privacy Policy. Your continued use of the Pringles website following the posting of changes to this Privacy Policy indicates that you accept those changes.

Overview

Pringles approaches communications with individuals with respect for, and commitment to, individual privacy rights, and the different sensibilities of our child consumers. We support active self-regulation of this environment to ensure that responsible marketers can maintain the right to use communication media to interact with our consumers.

In summary, whilst you should read each provision in this Privacy Policy, by providing your personal information to Pringles:

you agree that if you disclose your personal information to us, we may create a
database record of information about you and use the information for the purposes
set out below, including notifying you of any prizes awarded to you in a promotion
you have entered or communicating relevant product information or offers to you

- we may contact you for the purpose of handling an enquiry or complaint you have raised
- you may contact us via the methods set out below if you want to know what personal information we hold about you, update that personal information, opt out of receiving communications from us or ask us questions about this Privacy Policy.
- you may contact us via the methods set out below if you want to know what personal
 information we hold about you, update that personal information, opt out of receiving
 communications from us or ask us questions about this Privacy Policy.

Collection of personal information

The types of personal information Pringles collects will vary depending on the nature of your dealings with Pringles. At all times we try to only collect the personal information that we need for the particular business activity and/or function we are carrying out. The main way Pringles collects personal information about you is when you give it to us. This is generally:

- over the telephone (for example, when you contact our Consumer Contact Centre)
- via our company owned websites the Pringles website and the websites and apps of our products and brands (for example, when you register for an offer on one of our product websites or when you complete the Pringles customer electronic feedback form on our website)
- when you write to us
- when you register for or attend an event organised by us
- when you participate in a marketing campaign or promotion administered by us or our representatives.

Generally, the types of personal information we collect and hold may include your name, email address, postal address, date of birth, telephone number, details relating to your use of any Pringles product and/or service, details of your enquiry notified to Pringles and any other preferences you tell us about.

Our websites use cookies to help facilitate your ongoing access to and use of the websites. When you interact with us via our websites, the information collected from the use of cookies may include the IP address of the device you are using and information about the sites from which you accessed the internet, type of web browser and platform used, the pages visited on our website and the next site visited.

You may transact with Pringles anonymously or using a pseudonym where this is reasonable and practicable. However, for most of our activities and functions, we usually need a form of contact information to enable us to properly handle the issue or query (for example, to send a prize awarded to you in a promotion you have entered).

Use and disclosure of personal information

We will only use or disclose personal information for the purpose for which we collected it (primary purpose), a purpose related to the primary purpose, where required or permitted by law or where you have consented to such use or disclosure. The main purposes for which we may use or disclose personal information include:

Pringles will only use or disclose personal information for the purpose for which we collected it ("Primary Purpose"), a purpose related to the primary purpose, where required or permitted by law or where you have consented to such use or disclosure. The main purposes for which we may use or disclose personal information include:

- conducting competitions or promotions (for example, prize fulfilment);
- investigating or addressing a request, enquiry or complaint you have made;
- providing you with news or information about our products;
- conducting internal research aimed at improving our products or campaigns;
- occasionally sending marketing or promotional material about our products or offers that we consider you may be interested in;
- maintaining and keeping our records up to date and accurate;
- verifying your identity; and
- to maintain, secure, operate and/or improve our websites and services and your experience when using them.

We may state a more specific purpose when we collect your personal information.

Pringles may also provide personal information to its related bodies corporate for any of the purposes set out in this Privacy Policy.

Except as set out in this Privacy Policy, Pringles will not disclose personal information outside of Pringles and its related bodies corporate. Pringles will only disclose personal information to third parties where it is necessary or compulsory to do so. The main instances where Pringles may disclose personal information to third parties include:

- to law enforcement bodies, in order to comply with the law or to protect the rights, property or safety of the public or Pringles; or
- to external service providers such as prize fulfilment agencies, mailing houses, our
 consumer contact centre and IT service providers that host our website servers and
 databases, so they can provide the services we have contracted to them (for instance,
 to distribute prizes according to our competition terms and conditions or to collect
 feedback on our services and your experience when using our services).

Quality, storage and security of personal information

Any personal information that you provide Pringles will be stored on secure servers located in the United States of America. The server is maintained by Pringles and its authorised third party IT storage providers. As the server is maintained by Pringles and its authorised third party IT storage providers, these entities may access your personal information however any such use will be for internal administrative purposes only, for example to keep our databases up to date. Pringles takes steps to ensure that third parties, including those located overseas, handle all personal information in accordance with the APPs and this Privacy Policy.

Pringles considers the security of your personal information is of utmost importance. To this end, Pringles takes all physical and electronic steps to keep the personal information we hold secure from unauthorised access, misuse, modification, loss and interference, both internally and externally. For example, Pringles only permits your details to be accessed by authorised personnel, and maintains up to date electronic protections and tools to safeguard our systems. Additionally, we take reasonable steps to destroy or permanently de-identify personal information in a secure manner when we no longer need it, in accordance with set Pringles policies and procedures. We also ensure that we only disclose your information to third parties where it is necessary or compulsory to do so, and we impose strict security requirements on all such third parties regarding how they hold and deal with personal information. Unfortunately, no data transmission over the internet can be guaranteed to be fully secure and you need to be aware of this when communicating with or providing personal information to Pringles over the internet.

To ensure that the personal information we collect is accurate, we record information in a consistent format and according to standard protocols, promptly update our records when we receive new or updated information, only grant edit rights to personnel on a need to know basis and regularly audit our databases.

Changes and access to personal information

If you want to:

- know what personal information Pringles holds about you or gain access to this personal information;
- update or correct any personal information Pringles holds about you; and/or
- request that Pringles ceases using your personal information for any or all of the purposes described in this Privacy Policy

you may do so by contacting us in writing or by telephone as set out below (see "Contact us" section, below).

When you contact us with such a request, we will take steps to update your personal information, provide you with access to your personal information and/or otherwise address your query within a reasonable period after we receive your request. To protect the security of your personal information, you may be required to provide identification before we update, or provide you with access to your personal information.

In any marketing communication sent by us directly to you (for instance by email), you will be given the option to 'opt out' from receiving communications from Pringles, such as by clicking on an 'unsubscribe' link in the body of an email or at the end of an email.

Questions or complaints?

If you have any questions about Pringles' Privacy Policy, receive communications purporting to be connected with Pringles that you believe have been sent to you other than in accordance with this Privacy Policy, or would like to complain about a breach of your privacy, please contact the Pringles Consumer Contact Centre (see "Contact us" section, below). Our staff are prepared to address any concerns you may have about our handling of personal information. We will take steps to assess and handle your query and complaint within a reasonable period after we receive your request.

Contact us

Pringles Consumer Contact Centre

Address: 41-51 Wentworth Avenue, Pagewood, NSW 2035, Australia.

Email: consumer.affairs@Pringles.com

Telephone: 1800 770 828 (Australia) or 0800 403 983 (New Zealand)

More information

If you are located in Australia, more information about privacy law and the APPs is available from the Office of the Australian Information Commissioner at http://www.oaic.gov.au/. You can contact the Office of the Australian Information Commissioner on 1300 363 992 or by writing to: GPO Box 5218, Sydney NSW 2001.

If you are located in New Zealand, more information about privacy law and the IPPs are available from the New Zealand Office of the Privacy Commissioner at www.privacy.org.nz. You can contact the New Zealand Office of the Privacy Commissioner on 0800 803 909 (Monday to Friday, 10:00 am to 3:00 pm), using the online enquiry form available on the website or by emailing enquiries@privacy.org.nz.