

POLICY TITLE	PRIVACY POLICY
EFFECTIVE DATE	UPDATED AUGUST 2021
REVIEW DATE	AUGUST 2023
POLICY OWNER	BOARD

1. Overview

Thank you for using Toys R Us ANZ Limited. Your privacy is important to us and we are committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), which includes the Australian Privacy Principles (**APPs**) and any related privacy codes.

This Policy outlines how we collect, use, disclose and store your personal information. This Policy will also let you know how you can access that information.

Please read this Policy carefully and contact us using the details below if you have questions.

2. Consent

By providing personal information, you consent to us collecting, using, storing and disclosing your personal information in accordance with this Policy or as required or permitted by law.

If you continue using our services, then we will treat your use as your consent to us handling your personal information in accordance with this Policy.

3. What kinds of personal information do we collect and hold?

The type of personal information we collect will depend on the circumstances of its collection and the nature of your dealings with us. This information may include, but is not limited to:

- (a) your name, address, contact details and date of birth;
- (b) employment details and qualifications;
- (c) payment and transactional information;
- (d) your preferences and opinion about types of products and/or services;
- (e) your device ID, device type and information, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, Internet Protocol (IP) address and standard web log information;
- (f) information contained in any communications between you and us; and

- (g) any information about you that you provide through our services, including information you provide if you participate in a survey, promotion or competition.

We will only collect sensitive information where it is reasonably necessary for us to have this information to provide you with our service and where you have consented to the collection of this information.

If you choose not to provide information as requested, it may not be practicable for us to service your needs. For example, it will not be possible for us to provide you with tailored suggestions or offerings if you want to remain anonymous or use a pseudonym.

We sometimes receive unsolicited personal information. In circumstances where we receive unsolicited personal information we will usually destroy or de-identify the information as soon as practicable if it is lawful and reasonable to do so unless the unsolicited personal information is reasonably necessary for, or directly related to, our functions or activities.

4. Why do we collect your personal information?

We collect your personal information primarily to provide you with high quality goods and services. Some ways we use your personal information are:

- (a) to identify you;
- (b) to interact with you;
- (c) for the purpose for which the personal information was originally collected;
- (d) to develop consumer insights so we can better understand your preferences and interests, personalise your experience and enhance the services you receive;
- (e) to perform administrative and operational functions;
- (f) to comply with any legal requirements, including any purpose authorised or required by an Australian law, court or tribunal; and
- (g) for any other purpose for which you give your consent.

In relation to the personal information of prospective staff members and contractors, we collect personal information for purposes including to:

- (a) enable us to carry out our recruitment functions;
- (b) correspond with you, provide training and professional development;
- (c) fulfil the terms of any contractual relationship; and
- (d) ensure that you can perform your duties.

5. How we collect your personal information?

You give it to us

We collect personal information directly from you when you:

- (a) use our services;
- (b) purchase products using our platform;
- (c) share personal information with us via our website or social media;
- (d) communicate with us;
- (e) participate in one of our surveys, promotions or competitions; and
- (f) interact with our website, app and social media and advertising.

We collect it

We may also collect your personal information from third parties including:

- (a) service providers;
- (b) marketing companies;
- (c) other organisations who may have referred you to us; and
- (d) organisations with whom we have an agreement to share information for marketing purposes.

We will generally obtain consent from the owner of personal information to collect their personal information. Consent will usually be provided in writing; however, sometimes it may be provided orally or may be implied through a person's conduct. We will endeavour to only ask for your personal information if it is reasonably necessary for the activities that you are seeking to be involved in.

6. Disclosing your personal information

We may disclose your personal information to the following third parties:

- (a) to our business or commercial partners, including the owners or operators of any app or platform for which you have subscribed through us or in connection with us;
- (b) to our professional advisers, dealers and agents;
- (c) third parties and contractors who provide services to us, including customer enquiries and support services, debt-recovery functions, information technology service providers, marketing and advertising;
- (d) payment processing service providers;
- (e) any third parties authorised by you to receive information held by us.

We may also disclose your personal information if we are required, authorised or permitted by law.

We may send and store personal information overseas to the extent that it is necessary to perform our functions or activities.

7. Using your personal information for direct marketing

From time to time, and in support of our future development and growth, we or our business partners may use your personal information to contact you to promote and market our products and services.

You can opt-out from being contacted for direct marketing purposes by contacting us at info@toysrus.com.au or by using the unsubscribe facility included in each direct marketing communication we send. Once we receive a request to opt out from receiving marketing information, we will stop sending such information within a reasonable amount of time.

8. Security

We take all reasonable steps to protect personal information under our control from misuse, interference and loss and from unauthorised access, modification or disclosure. We hold your personal information in electronic form, in secure databases operated by our third-party service providers.

We protect the personal information we hold through firewalls and login password protocols / secure and access-controlled premises / monitoring staff access / auditing / network segregation for sensitive information store electronically.

While we take reasonable steps to ensure your personal information is protected from loss, misuse and unauthorised access, modification or disclosure, security measures over the internet can never be guaranteed.

9. Accessing or correcting your personal information

Accessing your personal information

If you would like to access your personal information, please contact us using the details below. In certain circumstances, we may not be able to give you access to your personal information. In these circumstances, we will write to you to explain why we cannot comply with your request. While we try to give you access to your personal information free of charge, we may charge you a reasonable fee if necessary.

Correcting your personal information

We try to ensure any personal information we hold about you is accurate, up-to-date, complete and relevant.

If you believe the personal information we hold about you should be updated, please contact us using the details below and we will take reasonable steps to ensure it is corrected if appropriate.

10. Destroying or de-identifying personal information

We destroy or de-identify personal information when we no longer need it, unless we are otherwise required or authorised by law to retain the information.

11. Making a complaint

If you believe your privacy has been breached or you have a complaint about our handling of your personal information, please contact us using the details below.

We take privacy complaints seriously. If you make a complaint, we will respond within 14 days to acknowledge your complaint. We will try to resolve your complaint within 30 days. When this is not reasonably possible, we will contact you within that time to let you know how long we will take to resolve your complaint.

We will investigate your complaint and, where necessary, consult with third parties about your complaint. We will decide how to address your complaint and write to you to explain our decision as soon as practicable. If you are not satisfied with our decision, you can refer your complaint to the Office of the Australian Privacy Commissioner.

12. Changes

We may, from time to time, amend this Policy, in whole or part, in our sole discretion. Any changes to this Policy will be effective immediately upon the posting of the revised Policy on our website. By continuing to use the services following any changes, you will be deemed to have agreed to such changes.

13. Contact us

All questions or queries about this Policy and complaints should be directed to:

Chief Financial Officer

Phone: 03 9081 9100

Email: finance_policies@toysrus.com.au

For information about privacy generally, or if your concerns are not resolved to your satisfaction, you can contact the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>