

JB Hi-Fi - Privacy Policy

Introduction

JB Hi-Fi Limited and its subsidiaries (“JB Hi-Fi”) recognise that your personal information is important to you and that you are concerned with its collection, use and disclosure. JB Hi-Fi, like other companies operating in Australia, is bound by the Australian Privacy Principles as set out in the Privacy Act 1988 (Cth) which set clear standards regarding these activities.

- This policy contains information about:
- when you can deal with JB Hi-Fi anonymously;
- the purposes for which JB Hi-Fi collects, holds, uses and discloses personal information;
- the types of personal information that JB Hi-Fi collects;
- how JB Hi-Fi collects and holds personal information;
- how you may access the personal information that JB Hi-Fi holds about you, and how you may seek correction of that personal information; and
- how you may complain about a breach of the Australian Privacy Principles by JB Hi-Fi and how JB Hi-Fi will deal with such a complaint.

Appendix A to this policy contains further information which JB Hi-Fi is required to disclose under the Privacy Act 1988 (Cth) to individuals who apply in-store for credit from a third party credit provider (such as HSBC or Telstra).

When can you deal with JB Hi-Fi anonymously?

Generally, you can deal with JB Hi-Fi anonymously (i.e. without identifying yourself). In certain circumstances however, JB Hi-Fi will ask you to provide personal information because it is required by law or JB Hi-Fi’s policies to do so, or because it would be impracticable to deal with you anonymously. These circumstances include where you order goods online (including when you pick up such goods from one of our stores), where you trade-in or buy second-hand games, where you purchase pre-paid mobile phone services, where you sign up to a post-paid mobile phone plan, where you purchase an extended warranty on a product or accidental damage insurance, where you apply to purchase goods on finance, where you return goods for repair, where you purchase goods to be delivered or installed, collect goods from a JB Hi-Fi warehouse or storeroom, where you enter one of our competitions, when you submit a request, enquiry, complaint, consumer guarantee or warranty claim, when you pre-order goods and when you purchase goods on lay-by.

Why does JB Hi-Fi collect, hold, use and disclose personal information?

JB Hi-Fi collects, holds, uses and discloses personal information for a number of purposes connected with our business operations, which include:

- providing you with products and/or services requested;
- dealing with requests, enquiries, complaints, consumer guarantee or warranty claims, and other customer care related activities;
- marketing our products and services and providing advice on our products;
- developing and improving our products and services;
- in connection with our loyalty or reward programmes and competitions;
- the operation and administration of accounts or subscriptions that you have with us;
- payment processing;
- carrying out certain checks (for example, for our fraud or theft prevention processes, if you wish to open an account with us, obtain credit from us, collect goods from a JB Hi-Fi warehouse or storeroom, or pick-up goods in-store that have been ordered online);
- interacting with companies or organisations with whom JB Hi-Fi has a business relationship (where you work for, or otherwise represent, such an organisation);
- reconciling payments due to JB Hi-Fi from suppliers in relation to goods or services provided to you by those suppliers;
- purposes relating to any third party acquisition or potential acquisition of an interest in JB Hi-Fi or its assets;

complying with our obligations under agreements with third parties (for example, under our authorised dealer arrangements with Telstra and our arrangements with consumer finance providers); and carrying out any activity in connection with a legal, governmental or regulatory requirement that we have to comply with, or in connection with legal proceedings, crime or fraud prevention, detection or prosecution. In particular, JB Hi-Fi is required by law to collect personal information in certain circumstances, including:

- if you trade-in goods (under, depending on the State or Territory in which you are located, the Second-hand Dealers and Pawnbrokers Act 2003 (Qld), the Second-hand Dealers and Pawnbrokers Act 1996 (SA), the Second-hand Dealers and Pawnbrokers Act 1994 (Tas), the Second-Hand Dealers and Pawnbrokers Act 1989 (Vic), the Consumer Affairs and Fair Trading Act 1990 (NT) and related regulations); and
- if you activate pre-paid mobile telecommunications services in a JB Hi-Fi store (in accordance with the Telecommunications Act 1997 (Cth) and the Telecommunications (Service Provider – Identity Checks for Pre-paid Public Mobile Telecommunications Services) Determination 2013).

We may also use and disclose your personal information for other purposes related to those described above which would be reasonably expected by you.

Documents (including hard copy documents and electronic documents such as emails) which coincidentally contain personal information will also be retained in accordance with JB Hi-Fi's normal document retention practices for accounting, legal and business purposes.

Generally, you have no obligation to provide any personal information requested by us. However, if you choose not to do so where we require this information, we may not be able to provide you with the goods and services that you want.

What personal information does JB Hi-Fi collect?

The kinds of personal information we collect or which we may hold about you may include:

- your name;
- your address;
- your date of birth;
- your telephone number(s);
- your e-mail address;
- payment information;
- transaction information;
- your user name and password;
- details about your earnings (if you are buying products using a finance plan);
- information contained on identification documents (such as driving licences) and, in some specific cases, copies of such identification documents, where we require these to verify your identity;
- information on how you use our products and services;
- your Internet Protocol ("IP") address, server address, domain name and information on your browsing activity when visiting one of our websites;
- your user name for social networking sites that you use, to refer to, or in conjunction with, our goods and services and personal preferences regarding products and services; and CCTV images of you whilst you are in one of our stores.

How does JB Hi-Fi collect and hold your personal information?

We collect personal information in a number of ways including:

- when you order goods or services from us (either online, in-store or over the telephone);
- when you collect goods that you have ordered from us, including from a JB Hi-Fi warehouse or storeroom;
- when you set up an account with us;
- when you purchase certain products or extended warranties from us;
- when you buy goods on lay-by or “duty-free” goods;
- when you pay for goods by cheque;
- when you subscribe to our catalogues or mailing lists or those of certain partners of ours such as Stack magazine;
- when you subscribe to JB Hi-Fi subscription service;
- when you sell second-hand goods to us or buy second-hand goods from us;
- when you enter competitions or promotions that we run;
- when you provide us your details for customer care purposes;
- when you browse one of our websites (further information is set out later in this Privacy Policy);
- when you submit an enquiry using one of our websites;
- when you complete surveys or provide online feedback or product reviews; and
- when you publicly comment about us on social media sites (for example so that we can answer questions about our products); and through the closed circuit video cameras located in our stores, when you visit one of our stores.

Generally, JB Hi-Fi will collect your personal information directly from you. However, JB Hi-Fi also holds information, collected incidentally, concerning individuals who work for companies or organisations that have a business relationship with JB Hi-Fi. Additionally, if you apply for a job with JB Hi-Fi, we may collect personal information about you from any third parties that you nominate as your referees in your application.

JB Hi-Fi holds personal information in a number of ways, including:

- as part of customer records and other electronic documents on which personal information is contained which are stored on our information technology systems and servers operated by third parties who provide services to us in connection with our business; and
- by securely storing hard copy documents on which personal information is contained, at our various premises and using third party document management and archiving services.

Marketing

We may use your personal information that we have collected to promote and market products and services to you, including through methods such as email and SMS. We will not use your personal information for marketing purposes where you have opted out of receiving such communications.

When we send you marketing communications we may provide you a particular way to opt-out such as via SMS. Otherwise, you may opt-out of receiving marketing communications by sending a written request to The Privacy Officer, JB Hi-Fi Group Pty Ltd, either by email to privacy@jbhifi.com.au or by pre-paid post to PO Box 561, Chadstone Centre VIC 3148.

Please note that when you create an account with us your details will be added to our marketing database to receive information relating to JB Hi-Fi and our products. You may also choose to receive such information by subscribing to our marketing database via one of our websites.

To opt-out of receiving JB Hi-Fi marketing materials from our marketing database, you will need to unsubscribe from our database. To do this, simply select the “unsubscribe” option in one of the emails that you receive from us. Please

note that if you have an account with JB Hi-Fi, we may still need to send you essential information about your account.

Sharing your personal information

JB Hi-Fi may disclose or receive personal information or documents about you, including to/from:

- organisations that provide services to us in connection with our business, including customer support, payment processing, administration, archival, data storage, hosting, research, mail and delivery, installation, distribution, logistics, marketing, auditing, share registry, consulting, financial and legal advisory, banking, debt collection, security or technical services and the operation of JB Hi-Fi websites. In some cases these service providers may collect your personal information on our behalf;
- if you return goods to JB Hi-Fi to be repaired, our repairs system administrator, the manufacturer of the goods and authorised repairers;
- law enforcement agencies to assist in the prevention, investigation and prosecution of criminal activities;
- parties involved in any third party acquisition or potential acquisition of an interest in JB Hi-Fi or its assets;
- our insurers and insurance brokers;
- if goods you purchase from JB Hi-Fi are subject to a product recall, the manufacturer or distributor of those goods; and
- to other third parties where you have specifically consented to the disclosure of information to these third parties.

Additionally, if you return goods to us on which personal information is stored for repair (for example, on a mobile phone or computer) and do not delete that personal information, JB Hi-Fi will send the goods to the repairer. By returning such goods to JB Hi-Fi for repair, you consent to JB Hi-Fi disclosing any personal information contained on the goods to the repairer, by way of JB Hi-Fi sending the goods to the repairer.

Disclosure of personal information to overseas recipients

JB Hi-Fi is likely to disclose the personal information that it collects and holds about you to third parties who are not in Australia (such as third parties who are located in the United States of America, Singapore, the United Kingdom, Holland and New Zealand). Some of the jurisdictions in which these third parties are located may have less protective privacy and data protections laws than Australia.

Personal information collected on behalf of other parties

JB Hi-Fi may collect information about you on behalf of third parties. For example:

- information collected for Telstra if you wish to enter into a contract with Telstra; or
- information collected for finance providers such as Flexigroup, HSBC Consumer Finance and GE Money Australia if you wish to purchase goods on finance.

In these cases the documentation that you sign will set out how the personal information that you provide will be used by these third parties and the privacy policies of the third parties will apply. JB Hi-Fi may also receive personal information or documents about you from these third parties where necessary in connection with the provision of goods or services by JB Hi-Fi.

How we deal with your personal information if you apply for a job with us

If you apply for a job with us, you may be required to provide us with certain personal information, including your name, employment and educational background, and other personal information which we may require you to provide, or which you choose to provide us, in relation to your job application.

We will hold, use and disclose that information solely for the purpose of considering your application. In particular, in considering your application, it may be necessary for us to disclose some of that information to third parties to verify the accuracy of that information. In such circumstances, we will disclose only such information as is necessary in the circumstances.

In considering your application, we may also collect personal information about you from any third parties that you nominate as your referees in your application.

Security of your personal information

We will take reasonable steps to ensure that the personal information that we hold is stored in a secure environment protected from misuse, interference and loss and any unauthorised access, modification or disclosure.

How to access, correct and update your personal information

Upon your request, JB Hi-Fi will provide access to your personal information that we hold (except in certain circumstances set out in the Privacy Act 1988 (Cth)). JB Hi-Fi reserves the right to charge you an administration fee of \$25 for providing access to your personal information and will, of course, require some proof of your identify before providing information to you.

You may also request us to correct the personal information that JB Hi-Fi holds about you. If you do so and we are satisfied that, having regard to a purpose for which the information is held, the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, JB Hi-Fi will take such steps as are reasonable in the circumstances to correct your personal information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

To request access to the personal information that JB Hi-Fi holds about you, or to update or correct that personal information, please send a written request to The Privacy Officer, JB Hi-Fi Limited, either by email to privacy@jbhifi.com.au or by pre-paid post to PO Box 561, Chadstone Centre VIC 3148.

In addition:

- if you are a subscriber to our marketing database you can also update your details via the “unsubscribe” option in one of the emails that you receive from us;
- if you subscribe to one of our services you can also update your details via that service.

How to make a complaint

If you are concerned that the way JB Hi-Fi collects, holds, uses or discloses your personal information may be in breach of the Australian Privacy Principles, please send written details of your complaint to The Privacy Officer, JB Hi-Fi Group Pty Ltd, either by email to privacy@jbhifi.com.au or by pre-paid post to PO Box 561, Chadstone Centre VIC 3148.

How JB Hi-Fi will handle complaints

After receiving a complaint, we will consider whether we need any further information from you to properly consider and investigate the complaint, and may request such information from you. We will then:

- conduct internal discussions with the relevant business units involved in the collection, holding, use or disclosure of your personal information which is the subject of your complaint, and evaluate whether we believe that such collection, holding, use or disclosure of your personal information was in breach of the Australian Privacy Principles; and
- notify you of the results of our investigation of your complaint.

If the conclusion of our investigation is that our collection, holding, use or disclosure of your personal information was in breach of the Australian Privacy Principles, we will take steps to remedy the breach as soon as reasonably practicable.

We will endeavour to notify you of the results of our investigation of your complaint within 30 days of receiving your complaint. However, if your complaint involves complex matters or requires extensive investigation and consultation, it may not be possible to respond within this timeframe.

If you are not satisfied with our response to your complaint you are entitled under the Privacy Act 1988 (Cth) to make a complaint to the Office of the Australian Information Commissioner. Information about how to make a complaint is available from the Office of the Australian Information Commissioner's website (www.oaic.gov.au).

Additional information for purchasers of mobile phones

Unless you have opted out, when you buy a mobile phone and / or a mobile phone service, JB Hi-Fi may collect and use your personal information for the purposes of follow up communications, associated products/services or marketing communications.

When you buy a mobile phone, JB Hi-Fi will ask you to provide proof of identity details such as a Credit Card, Drivers License or Passport and the phone's unique identification number (IMEI) will be recorded. In the case of prepaid phones which include a sim card and phones sold in conjunction with post-paid phone plans your personal information is collected in accordance with government regulations, as a condition of JB Hi-Fi's licence as a Telstra dealer and for the purpose of provisioning Telstra services and accounts. If you refuse to provide this information when purchasing a product of this type then JB Hi-Fi will not be able to sell it to you.

JB Hi-Fi also collects and retains personal information, such as your name, proof of ID reference number, date of birth, address and phone IMEI number from the sale of all mobile phone handsets for the purpose of record keeping in accordance with its Consumer Guarantees Compliance Program (warranties regarding acceptable quality and fitness for purpose), including for the purpose of facilitating efficient retrieval and authentication of records in the event of warranty claims and product returns (for example, if you have lost your receipt). Details are also recorded in accordance with JB Hi-Fi's fraud and theft prevention strategies.

In the case of an "Outright" phone purchase, personal information is not transmitted to any telecommunications carrier or government agency.

If you are purchasing an Outright Phone (a phone without a Sim card included and that is not on a "plan") in a JB Hi-Fi store and do not wish to have JB Hi-Fi collect your personal information, you can advise JB Hi-Fi staff that you would like to purchase the Outright Phone "Anonymously". Staff will still be required to collect the phone's unique IMEI number but will not record any personal identity information in JB Hi-Fi's system and will record the sale as "Anonymous". Purchasing an Outright Phone "Anonymously" means that, if you lose your receipt, JB Hi-Fi may not be able to retrieve evidence of your proof of purchase for consumer guarantee (warranty) purposes. Please note that you will not be able to purchase an Outright Phone "Anonymously" if you are purchasing online (including for pick-up in store).

The other provisions of this Privacy Policy also apply to the purchase of mobile phones.

Additional information for users of our websites

If you visit www.jbhifi.com.au, www.jbhifionline.com.au or any other JB Hi-Fi websites (the “Websites”) to read, browse or download information, our system may record information such as the date and time of your visit to the Website, the pages accessed and any information downloaded. This information is used (i) for statistical and reporting purposes; (ii) for website administration, security and maintenance purposes; and (iii) to direct you to material on our Websites that we believe will be of interest to you.

Like many websites, our Website may use “cookies” from time to time. Cookies are small text files that we transfer to your computer’s hard drive through your web browser to enable our systems to recognise your browser and your log-in status. Cookies may also be used to record non-personal information such as the date, time or duration of your visit, or the pages accessed, for website administration, statistical and maintenance purposes. Any such information will be aggregated and not linked to particular individuals. The default settings of browsers like Internet Explorer usually allow cookies, but users can easily erase cookies from their hard-drive, block all cookies, or receive a warning before a cookie is stored. Please note that some parts of the Website may not function fully for users that disallow cookies.

Our Website also uses tags, which are tiny bits of website code that allow us to measure traffic and visitor behaviour, and to understand the impact of online advertising, use remarketing and audience targeting. These tags do not collect any personally identifiable information.

While we take great care to protect your personal information on our Website and use state-of-the-art data transmission encryption, unfortunately no data transmission over the Internet can be guaranteed to be 100% secure. Accordingly, we cannot ensure or warrant the security of any information that you send to us or receive from us online. This is particularly true for information you send to us via email. We have no way of protecting that information until it reaches us. Once we receive your transmission, we use our best efforts to ensure its security in our possession.

The Websites may contain links/ plug-ins to other sites. We are not responsible for content of, or the privacy practices or policies of, those sites.

Exemptions

JB Hi-Fi sometimes handles personal information relying on exemptions under the Privacy Act 1988 (Cth), for example in relation to (i) employee records; (ii) related bodies corporate; (iii) provision of services to State or Territory authorities; and (iv) operations outside Australia relating to personal information of non-Australians.

Any permitted handling of personal information under such exemptions will take priority over this Privacy Policy to the extent of any inconsistency.

Privacy Queries

If you have any queries or concerns, further information can be obtained by contacting our Privacy Officer by email privacy@jbhifi.com.au or by post to The Privacy Officer, JB Hi-Fi Group Pty Ltd, PO Box 561, Chadstone Centre VIC 3148.

JB Hi-Fi Limited ACN 093 220 136

Version 8 - Date of Publication 31 August 2017

Appendix A – Further information for individuals who apply in-store or on the JB Hi-Fi website for credit from a third party credit provider

Background

As part of JB Hi-Fi’s arrangements with third party credit providers (such as HSBC and Telstra):

- customers may apply in-store for credit provided by third party credit providers; and
- JB Hi-Fi may assist in the processing of such applications.

This Appendix A contains certain information which JB Hi-Fi is required under the Privacy Act 1988 (Cth) to disclose to individuals who apply in-store for credit from a third party credit provider. In this Appendix A, these individuals are referred to as **Third Party Credit Applicants**.

Unless you are a Third Party Credit Applicant, the information in this Appendix A will not be relevant to you.

What kinds of credit-related information does JB Hi-Fi collect and hold about Third Party Credit Applicants?

JB Hi-Fi may collect (and hold) certain personal information contained in the application documentation completed by Third Party Credit Applicants when they apply in-store for credit from a third party credit provider, including his or her:

- full name;
- date of birth;
- sex;
- current address (as shown on his or her driver's licence);
- employer; and
- driver's licence number.

JB Hi-Fi will also collect (and hold) certain information contained in the application documentation completed by Third Party Credit Applicants about the credit applied for by Third Party Credit Applicants, including:

- the name of the third party credit provider;
- the type of credit applied for;
- the day on which the credit is applied for (and entered into);
- the terms and conditions of the credit applied for (including in relation to repayment);
- the maximum amount of credit available under the consumer credit applied for; and
- the expiry date of the credit.

The information described in the preceding 2 paragraphs is collectively referred to as Application Documentation Information.

Why does JB Hi-Fi collect, hold, use and disclose Application Documentation Information?

JB Hi-Fi collects, holds, uses and discloses Application Documentation Information for the purposes of:

- submitting the application documentation completed by Third Party Credit Applicants to the relevant third party credit providers; and
- administering its arrangements with those third party credit providers.

Hard copies of the application documentation signed by Third Party Credit Applicants (which will contain Application Documentation Information) will also be retained in accordance with JB Hi-Fi's normal document retention practices for legal and business purposes.

How does JB Hi-Fi hold Application Documentation Information?

JB Hi-Fi holds Application Documentation Information by securely storing the hard copy application documentation signed by Third Party Credit Applicants, at our various premises and using third party document management and archiving services.

Is JB Hi-Fi likely to disclose Application Documentation Information to recipients who are not subject to Australian privacy laws?

JB Hi-Fi is not likely to disclose Application Documentation Information to recipients who are not subject to Australian privacy laws.

How to correct and update your Application Documentation Information

You may also request us to correct the Application Documentation Information that JB Hi-Fi holds about you. If you do so and we are satisfied that, having regard to a purpose for which the information is held, the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, JB Hi-Fi will take such steps as are reasonable in the circumstances to correct your Application Documentation Information to ensure that, having regard to the purpose for which it is held, it is accurate, up-to-date, complete, relevant and not misleading.

To request JB Hi-Fi to correct or update the Application Documentation Information that it holds about you, please send a written request to The Privacy Officer, JB Hi-Fi Group Pty Ltd, either by email to privacy@jbhifi.com.au or by pre-paid post to PO Box 561, Chadstone Centre VIC 3148.

How to make a complaint

If you are concerned that the way JB Hi-Fi collects, holds, uses or discloses your Application Documentation Information may be in breach of Division 3 of Part IIIA of the Privacy Act 1988 (Cth) or the registered Credit Reporting Privacy Code, please send written details of your complaint to The Privacy Officer, JB Hi-Fi Group Pty Ltd, either by email to privacy@jbhifi.com.au or by pre-paid post to PO Box 561, Chadstone Centre VIC 3148.

How JB Hi-Fi will handle complaints

After receiving a complaint, we will consider whether we need any further information from you to properly consider and investigate the complaint, and may request such information from you. We will then:

- conduct internal discussions with the relevant business units involved in the collection, holding, use or disclosure of your Application Documentation Information which is the subject of your complaint, and evaluate whether we believe that such collection, holding, use or disclosure of your Application Documentation Information was in breach of Division 3 of Part IIIA of the Privacy Act 1988 (Cth) or the registered Credit Reporting Privacy Code; and
- notify you of the results of our investigation of your complaint.

If the conclusion of our investigation is that our collection, holding, use or disclosure of your Application Documentation Information was in breach of Division 3 of Part IIIA of the Privacy Act 1988 (Cth) or the registered Credit Reporting Privacy Code, we will take steps to remedy the breach as soon as reasonably practicable.

We will endeavour to notify you of the results of our investigation of your complaint within 30 days of receiving your complaint. However, if your complaint involves complex matters or requires extensive investigation and consultation, it may not be possible to respond within this timeframe. In these circumstances, we will seek your agreement to a longer period for us to respond to your complaint.

If you are not satisfied with our response to your complaint you are entitled under Part V of the Privacy Act 1988 (Cth) to make a complaint to the Office of the Australian Information Commissioner. Information about how to make a complaint is available from the Office of the Australian Information Commissioner's website (www.oaic.gov.au).