PRIVACY POLICY

Policy

Purpose

This Policy provides information on how we collect and process personal information (also known as personal data) and governs the manner through which personal information will be managed.

Scope

This Policy applies to the Blundstone Group entities and meets the requirements of the following acts and regulations:

- Australian Privacy Principles under the Privacy Act 1988 (Cth);
- Privacy Principles under the Privacy Act 2020 (New Zealand);
- General Data Protection Regulation (EU) 2016/679; and
- Various US state laws, including the California Consumer Privacy Act (California Civil Code), California Privacy Rights Act, Colorado Privacy Act, Connecticut Data Privacy Act, Delaware Data Privacy Act, Florida Information Protection Act, Indiana Consumer Data Protection Act, Iowa Consumer Data Protection Act, Kentucky Consumer Data Protection Act, Maryland Online Data Privacy Act, Minnesota Consumer Data Privacy Act, Montana Consumer Data Privacy Act, Nebraska Data Privacy Act, New Hampshire Data Privacy Act, New Jersey Data Protection Act, Oregon Consumer Privacy Act, Rhode Island Data Transparency and Privacy Protection Act, Tennessee Information Protection Act, Texas Data Privacy & Security Act, Utah Consumer Privacy Act, and the Virginia Consumer Data Protection Act.

This Policy applies to the processing of personal information that we collect when you:

- visit our online shops at our Websites;
- when you place orders for our products;
- when you are a potential, current, or former employee, or contractor to the Blundstone Group;
- when you provide products or services to the Blundstone Group in your capacity as a supplier, distributor, manufacturer, wear tester, model, influencer; or
- when you are sponsored by us.

To keep up with changing legislation and best practice we may revise this Policy at any time. We will notify you in advance of any changes to this Policy and our processing operations. We will post any changes to this Policy on our Websites, so we encourage you to check this Policy from time to time.

Our Commitment

We recognise the importance of protecting the privacy of information provided to and collected by us, in particular, information that can identify an individual. We are committed to protecting personal information.

In this Policy “we”, “our” and “us” refers to the Blundstone Group and to third parties we have contracted to or authorized to act on our behalf.

This Policy will be reviewed periodically and we welcome comments and feedback.

Personal Information and Data

In this Policy “Personal Information” is to be read as “personal data” for the purposes of General Data Protection Regulation compliance, and Blundstone Australia Pty Ltd is the “data controller”.

Examples of personal information include an individual’s name, email address, telephone number(s), workplace contact details, payment information, support queries, comments on social media streams and information we may collect about an individual’s preferences. More information about what we collect is provided below.

Personal Information does not include data where the identity has been removed, such as aggregated data. If an individual cannot be identified by the data we collect or hold then it is not considered Personal Information and this Policy does not apply.

What Personal Information is collected?

We collect personal information necessary for Blundstone to provide products and services and perform our business functions, in particular in connection with the operation and provision of our online shops. We will only collect data by lawful and fair means and for specific, explicit and legitimate purposes.

We may collect personal information from:

- our customers and consumers
- potential, current, and former employees and contractors to the Blundstone Group
- third parties providing products or services to the Blundstone Group, including (but not limited to) suppliers, distributors, manufacturers, wear testers, models, influencers, and those we sponsor.

We may collect, use, store and transfer various kinds of personal information which we have grouped together as follows:

- ***Identity Data*** includes full name, username or similar identifier, title, date of birth, photos or videos shared with us, gender and government tax identification numbers for businesses and individuals.
- ***Employment Data*** information regarding an individual’s employment including company, employment history and other documents and information regarding education and qualifications. N.B. We will only collect Employment Data for our Australian and New Zealand operations.

- ***Contact Data*** includes billing address, delivery address, email address and telephone number(s).
- ***Transaction Data*** includes details about payments to and/or from an individual, and details of products and services purchased from us or products or services provided to us.
- ***Technical Data*** includes internet protocol (IP) addresses, an individual's login data, browser type, version and language, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access our Websites.
- ***Profile Data*** can include an individual's username and password, purchases or orders made, interests, preferences, feedback and survey responses, testimonials about our products and services, complaint details and customer support inquiries.
- ***Usage Data*** includes information about how our Websites, products and services are used by individuals.
- ***Marketing and Communications Data*** includes communications content preferences.
- ***Financial Data*** includes payment card details. Where we manually process a payment and the details have been provided over the telephone the Financial Data is immediately entered into the payment portal and is not retained or stored by us. Where Financial Data has been provided to us unsolicited by a customer via email we will use the Financial Data to process payment and then immediately permanently delete the email. Financial Data is not retained or stored. Where a reoccurring payment occurs the payments are processed via a third-party payment provider and we do not receive any Financial Data. When customers purchase directly from our Websites they will be directed to an unaffiliated payment service ("Payment Service") to make payment (e.g. PayPal or Shopify Payments). When using a Payment Service, a customer will be directed to the webpage for that Payment Service. Any information provided when using a Payment Service may be collected and used by the Payment Service provider in accordance with that provider's privacy policy. Individuals should check the provider's privacy policy to understand how it will manage their personal information. We do not retain or store any of that Financial Data.
- ***Aggregated Data*** such as statistical or demographic data. Aggregated Data may be derived from personal information but is not considered personal information in law as this data does not directly or indirectly reveal an individual's identity. For example, we may aggregate Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with personal information so that it can directly or indirectly identify an individual, we treat the combined data as personal information which will be processed in accordance with applicable data protection laws and as described in this Policy.

Sensitive Information

References in this Policy to "Sensitive Information" should be read as references to special categories of personal data under the General Data Protection Regulation.

We only collect Sensitive Information with an individual's prior explicit consent.

We may request Sensitive Information such as health information or a national Police Check for criminal records for use in pre-employment screening or during employment with us. We may also

hold trade union membership details where an employee requests that their fees are paid by Blundstone on their behalf.

We will only use Sensitive Information for the purpose expressly stated in the consent given, and we will only retain the Sensitive Information for as long as we need it to achieve the purposes for which the Sensitive Information has been collected.

If you fail to provide Personal Information (Anonymity and pseudonymity)

Where practicable, we will allow you to deal with us on an anonymous or pseudonymous basis. If this is practicable we will only solicit information in this way. However, if it is not practicable for the purposes for which information is collected then we will seek the Personal Information required as set out in this Policy.

There is generally no statutory or contractual obligation to provide Personal Information to us when concluding a distance sales contract through our online shops. However, there may be situations where we need to collect Personal Information, by law, or under the terms of a contract. When this information is not provided when requested we may not be able to perform the contract (for example, to provide goods or services). In this case, it is not possible to enter into a contract with us and we may have to cancel a product or service with notice.

Children

We do not intend to collect children's personal information. If a parent or guardian of a child who is under the legal age for the relevant jurisdiction believes that we may have collected a child's personal information they can contact us at dataprivacy@blundstone.com.au.

How is your Personal Information collected?

Direct interactions

We may ask for certain types of Personal Information where you wish to:

- obtain a particular service or product from us;
- make a warranty claim or return a product to us;
- apply for a job with us (N.B. only for our operations in Australia and New Zealand);
- create a customer (credit) account;
- apply to become, or become a distributor of our products;
- apply to provide or provide services to us as a contractor, wear tester, model or influencer; or
- apply for sponsorship.

This might happen over the telephone, via email, through social media or one of our Websites, by filling in a paper or online form, or meeting with us face-to-face. We will give a collection notice at the time, to explain how we will use the Personal Information we were asking for. The notice may be verbal or in writing.

Unsolicited information

Personal Information may also be provided for us to use without us directly asking for it, for example when you engage with us on social media or on one of our Websites. This includes Personal Information provided when you:

- apply for our products or services;
- create an account on one of our Websites;
- browse our products and services and generally interact with one of our Websites;
- interact with our customer service, sales, marketing or design teams;
- subscribe to our service or publications;
- select content communication preferences via one of our Websites or other means;
- enter a competition, promotion or survey;
- give us feedback; or
- voluntarily submit Personal Information to us for any reason.

Any Personal Information which is provided to us but which we have not directly asked for will be retained where it falls within our primary purposes for collection of Personal Information and dealt with in accordance with this Policy.

Information we collect from others

Where you apply for a job or contract with us, we may collect Personal Information from referees, pre-employment screening agencies engaged by us and from criminal history searches from relevant government departments. We may also conduct credit checks on customers and check details about our suppliers and other third-party providers from publicly available sources.

Additionally, we may receive personal information from the following parties:

- analytics providers;
- advertising networks;
- search information providers; and/or
- technical and delivery services.

Cookies

As you interact with us via our Websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Information by using cookies and other similar technologies. We may also receive Technical Data about you when you visit other websites employing our cookies.

Cookies are data that a website transfers to your hard drive for record-keeping purposes. Cookies, which are industry standard and used by most websites, including those operated by us, can facilitate your ongoing access to and use of a website. They allow us to customise our Websites to your needs.

There is a simple procedure in most browsers that allows you to deny or accept the Cookie feature in the event that you do not want information collected through the use of Cookies, however Cookies may be necessary to provide some features of our on-line services.

How we use your Personal Information

Most commonly, we will use Personal Information in the following circumstances:

- to provide services or products;
- process payments to and from suppliers, customers, distributors, contractors, advisors, influencers, models, individuals sponsored by us, and other third parties including satisfying regulatory obligations including but not limited to taxation obligations;
- recruitment activities;
- establishing consumer, customer and supplier accounts;
- engaging with and managing contractors;
- engaging with and managing commercial relationships with manufacturing partners, suppliers, distributors, customers and consumers;
- engaging with and managing relationships with wear testers, influencers and models;
- where we need to perform a contract / activity;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- where we need to comply with a legal or regulatory obligation;
- to provide technical or other support;
- to answer enquiries about our services or products, or to respond to a complaint or warranty claim; or
- to promote our other programs, products or services which may be of interest to individuals (unless they have not consented to or opted out from such communication)

We may use Personal Information for other purposes with consent, which you can withdraw at any time with effect to the future and without affecting the legitimacy of the processing prior to your withdrawal by contacting us using the contact details set out in the contact section below.

In addition, there may be other types of lawful purposes necessary to process Personal Information from time to time.

Shopify

Our Websites are hosted on Shopify, which collects and processes your Personal Information to provide and improve the Websites. Information you submit on our Websites may be transmitted to and shared with Shopify. To learn more about how Shopify uses your Personal Information and any rights you may have, you can visit the Shopify Consumer Privacy Policy. Depending on where you live, you may exercise certain rights with respect to your Personal Information here: Shopify Privacy Portal Link.

Purposes for which we will use your Personal Information

We have set out below, in a table format, a description of all the ways we may use Personal Information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

"***Legitimate interests***" means the interests of our business in conducting and managing our business to enable us to provide the best service/product and the best and most secure experience. Our legitimate interests also include our business interests in improving our products and services and in tailoring them to your needs and interests. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process Personal Information for our legitimate interests. We do not use Personal Information for activities where our interests are overridden by the impact on you (unless we have consent or are otherwise required or permitted to by law). You can ask us for further information about how we assess our legitimate interests against any potential impact in respect of specific activities.

"***Performance of Contract***" means processing Personal Information where it is necessary for the performance of a contract or to take steps at your request before entering such a contract.

"***Comply with a legal or regulatory obligation***" means processing Personal Information where it is necessary for compliance with our legal or regulatory obligations.

Note that we may process Personal Information for more than one lawful ground depending on the specific purpose for which we are using the data. Please contact us if you need more details about the specific legal ground we are relying on to process Personal Information.

Change of purpose

We will only use Personal Information for the purposes for which we collected it and only where we can rely on a sufficient legal basis, unless we reasonably consider that we need to use it for another reason and that reason is related to the primary purpose and an individual would reasonably expect it could be used for that purpose.

If we need to use your Personal Information for an unrelated purpose to satisfy a legal or regulatory obligation, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your Personal Information without knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Purpose/Activity	Type of information or data	Lawful basis for processing including basis of legitimate interest
• To set up accounts and engaging with customers, suppliers, distributors, wear testers, contractors, influencers, individuals sponsored by us and other third parties • To keep our records updated • To analyze how customers use our products and/or services	Identity Data Contact Data	Performance of a contract Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated) Consent
• To process, deliver and receive orders and returns including: • Manage payments, refunds, fees and charges • Collect and recover money owed to us	Identity Data Contact Data Financial Data Transaction Data	Performance of a contract Necessary for our legitimate interests (to recover debts due to us)

To manage our relationship with you which will include: • Notifying you about changes to our terms or this Policy • Asking you to leave a review or take a survey • Responding to enquiries about our goods or services • Responding to a complaint or warranty claim	Identity Data Contact Data Profile Data Marketing and Communications Data	Performance of a contract Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated) Consent
Recruitment activities (Australia and New Zealand only)	Identity Data Contact Data Employment Data	Necessary for our legitimate interests (to recruit employees for our business)
To enable customers and consumers to partake in a prize draw, competition or complete a survey	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data	Performance of a contract Consent (if requested)
To administer and protect our business and our Websites (including troubleshooting, data analysis, protection against cyber-attacks and fraud, testing, system maintenance, support, reporting and hosting of data)	Identity Data Contact Data Technical Data	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) Necessary to comply with a legal obligation
• To deliver relevant website content and advertisements and measure or understand the effectiveness of the advertising we serve • To define types of customers for our products and services • To keep the advertising content on our Websites updated and relevant • To develop and grow our business • To analyze and improve our marketing strategy	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data Technical Data	Consent
To make suggestions and recommendations about goods or services that may be of interest to customers and consumers	Identity Data Contact Data Technical Data Usage Profile Data Marketing and Communications Data	Consent

To facilitate a corporate transaction, including the sale of all or parts of our business or assets	Identity Data Contact Data Employment Data Profile Data Marketing and Communications Data	Necessary for our legitimate interest (to sell all or parts of our business or assets)

Marketing and communications

We strive to provide relevant communications content preferences.

With your prior consent, we may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want, or what may be of interest to or relevant for you. This is how we decide which content and offers may be relevant (we call this marketing).

In this context, we may use your Personal Information to provide you with additional content and services, such as:

- customised materials about offers, products and services that may be of interest, such as by email, SMS, 'personal advertising' and 'targeted advertising', including through cross-device tracking (as permitted by law);
- auditing relating to interactions, transactions and other compliance activities; and
- other purposes you consent to, are notified of, or are disclosed when you provide your Personal Information.

Whether you have signed up to receive newsletters, requested information from us or purchased goods or services from us, or provided us with your Personal Information when you entered a competition or registered for a promotion, we will ensure we have consent before sending you any marketing communications.

For clarity, if we do not have your consent, we will not sell, rent or share your personal information for marketing or advertising purposes.

Opting out / withdrawal of consent

You may withdraw your consent at any time with effect to future and without affecting the legitimacy of the processing prior to exercising your right to withdraw consent. You can exercise your right of withdrawal either by asking us to stop sending content or marketing messages at any time by logging into our Websites and checking or unchecking relevant boxes to adjust marketing preferences or by following the opt-out links on any marketing message sent, or by contacting us at any time using the contact details set out below.

Opting out of receiving marketing communications does not void the Personal Information provided to us as a result of a product/service purchase or other transactions.

Disclosures of your Personal Information

Disclosure

Apart from where consent has been given, or disclosure is necessary to achieve the purpose for which it was submitted, your Personal Information may be disclosed in special situations where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring, or interfering (intentionally or unintentionally) with our rights or property, users, or anyone else who could be harmed by such activities. Also, we may disclose your Personal Information when we believe in good faith that the law requires disclosure. The legal basis for disclosing your Personal Information in these situations is either our legitimate interests in protecting our rights, property or the rights of third parties, or our obligation to comply with a legal or regulatory requirement (e.g. a court or administrative order).

Third party service providers

We may engage third parties to provide goods or services on our behalf. In that circumstance, we may disclose your Personal Information to those third parties to meet your request for goods or services and to comply and fulfill our contractual obligations with you. Our third-party service providers are required to only use your Personal Information on our behalf, under our instructions.

This Policy also covers all third-party people or organisations we have contracted, employed and/or authorised to undertake activities or functions on our behalf.

We require all third parties to respect the security of Personal Information and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Information for their own purposes and only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

All such third-party agents will be required to meet all Blundstone privacy policies and requirements.

International transfers

We are a global business and may disclose your Personal Information to overseas recipients including contractors, data processors and other trusted third parties, including the transfer of relevant personal information to the relevant in-country approved Blundstone distributor for actioning. That Blundstone distributor will be subject to the relevant laws and regulations of its own country or territory in relation to any personal information it receives. You should check the relevant Blundstone distributor’s privacy policy to understand how it will manage your Personal Information.

Blundstone may choose to store your Personal Information outside of your country of residence and country of collection.

If we disclose your Personal Information to an overseas recipient, we will take steps to ensure that the recipient keeps Personal Information safe and complies with this Policy.

Where such a third country does not have an adequate level of data protection, we will implement appropriate safeguards to protect your Personal Information. If you wish to obtain information about these safeguards, please contact us using the contact details set out below.

How does Blundstone hold your Personal Information and manage the quality and security of the data?

We may hold your Personal Information in either hard copy or electronic form.

To the extent required by law we will take reasonable steps to make sure that the Personal Information that we collect, hold, use and disclose is accurate, complete and up to date and protect it from misuse, interference and loss and from unauthorised access, modification or disclosure.

Destruction and de-identification

Blundstone will take reasonable steps to ensure that Personal Information which is no longer required is destroyed or de-identified in a secure manner.

Security of personal information provided via electronic means

We strive to ensure the security, integrity and privacy of Personal Information submitted to or through our Websites or via other electronic means, and we review and update our security measures considering current technologies and changing regulations.

We will endeavour to take all reasonable steps to protect Personal Information transmitted or provided to us online. Once we do receive a transmission, we will also make our best efforts to ensure its security on our systems.

In addition, our employees and the contractors who provide services related to our information systems, including our Websites, are obliged to respect the confidentiality of any Personal Information held by us.

We have put in place appropriate security measures to prevent Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to Personal Information to those employees, agents, contractors and other third parties who have a business requirement to know and where there exists a legal basis for the disclosure. They will only process Personal Information on our instructions, and they are subject to a duty of confidentiality and to do so in accordance with their obligations to the law.

We have put in place procedures to deal with any suspected Personal Information breach and will notify relevant individuals and any applicable regulator of a breach where we are legally required to do so.

Website links and Plug-ins

Our Websites may include plug-ins and similar applications operated by third parties. Enabling those connections may allow third parties to collect or share data.

We do not control these third-party plug-ins or applications and are not responsible for their data processing and privacy policies. These third-party plug-ins and applications include:

Purpose	Examples	Privacy Notices
To provide payment gateways	Shopify Payments, PayPal and Apple Pay	Shopify, PayPal, Apple
To enable the website to function as intended and	Google Analytics, Google Tag Manager, Matrixify, Rewind Backups, Shop, Avalara, Pandectes, Forter, Hotjar	Google, Matrixify, Rewind, Shopify, Avalara, Pandectes, Forter, Hotjar

monitor, analyze and improve performance		
To provide enhanced website functionality and personalization	Zendesk, True Fit, HubBox, Address Guard, Order Editing, Narvar Return and Exchange, Jotform, Google Maps	Zendesk, True Fit, HubBox, Address Guard, Order Editing, Narvar, Jotform, Google
To refine and enrich user experience, including displaying relevant ads that align with user's interests (i.e. targeted advertising)	Reviews.io, Google Search Console, Google Ads, Microsoft Ads, Spotify, TikTok, Pinterest, Klayvio, Vimeo, LinkedIn, The Trade Desk	Reviews.io, Google, Microsoft, Spotify, TikTok, Pinterest, Klayvio, Vimeo, LinkedIn, The Trade Desk

Our Websites may also include links to third party websites. When you leave our Websites, you should read the privacy policy of every website you visit.

How long will you use my personal information for?

We will only retain your Personal Information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, tax or reporting requirements.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of personal information, the purposes for which we process Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your Personal Information. Further information is provided below (see **Legal rights**).

In some circumstances we may aggregate and anonymise Personal Information so that it can no longer be associated with an individual for research or statistical purposes, in which case we may use this information indefinitely without further notice.

Legal rights

You have rights in relation to the Personal Information we hold about you. Depending on where you reside and laws applicable in that location, those rights may include the right to:

- access the Personal Information we hold about you ("Right of access by the data subject");
- know what Personal Information we have collected and the categories of third parties with whom we share or have shared your Personal Information;
- request the correction of your Personal Information ("Right to rectification");
- seek human review of automated decision making or profiling (please note, we do not use automated decision-making tools for profiling reasons);
- opt-out of direct marketing, and profiling for marketing;
- object to the processing for research or statistical purposes, or processing on the grounds of '*public interest*' or '*legitimate interest'* ("Right to object");
- erasure ("Right to be forgotten") and the right to appeal a decision we may have made to retain your personal information;
- data portability;
- temporary restriction of processing. ("Right to restriction of processing");

- withdraw your consent at any time with effect to future without affecting the legitimacy of the processing prior to your withdrawal of consent; and
- right to lodge a complaint with the competent supervisory authority.

Below you will find a more detailed description of your rights in relation to the processing of your Personal Information. Please contact us if you wish to exercise any of these rights.

We will not discriminate against you for exercising any of your data subject rights. Only you, or someone legally authorized to act on your behalf (an "**Authorized Agent**"), may make a request to know or delete related to your Personal Information. We require Authorized Agents to provide written authorization confirming they may submit a request on your behalf. You may only submit a request to know twice within a 12-month period.

Once we receive your request and confirm your identity, we will review your request. We may deny your deletion request if retaining the information is proper and necessary or if an exception allowing us to retain the information applies.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. If we cannot provide you with access to your Personal Information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Accessing or correcting your Personal Information

You can request access to the Personal Information we hold about you. Unless an exception applies, we must inform you of the Personal Information we hold about you, within a reasonable time, and without reasonable expense.

You can also request the correction of the Personal Information we hold about you. We will take reasonable steps to make appropriate corrections to that Personal Information so that it is accurate, complete and up-to-date. Unless an exception applies, we must update, correct, amend or delete your Personal Information within a reasonable time period.

We will not charge you a fee to access your Personal Information (or to exercise any of your other rights). However, we may charge you a reasonable fee if a request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with a request in these circumstances.

We may need to request specific information to help us confirm your identity to enable you to access your Personal Information (or to exercise any other rights). This is a security measure to ensure that your Personal Information is not disclosed to someone who has no right to receive it. We may also contact you to ask for further information to speed up our response.

We try to respond to all legitimate requests without undue delay, and generally within a month. Occasionally it may take us longer than a month if, for instance, the request is particularly complex or there are a number of requests. In this case, we will notify and keep you updated. To seek access to or correction of your Personal Information, please contact us.

Erasure

You have a right to request erasure of Personal Information we hold about you. You can also ask us to delete or remove Personal Information where you have successfully exercised your right to object to processing (see below), where we may have processed your Personal Information unlawfully or where we are required to erase your Personal Information to comply with local law. Note, however, that we may not always be able to comply with your erasure request for specific legal reasons which we will provide notice of, if applicable, at the time of the request.

Object to processing

Where we are relying on our legitimate interests (or those of a third party) to process your Personal Information, you can object to our processing of your Personal Information on grounds relating to your particular situation.

You also have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your interests, rights and freedoms. We may also continue processing your Personal Information based on our legitimate interests where the processing is necessary for the establishment, exercise or defence of legal claims.

Restriction of processing

You have the right to request restriction of processing of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios:

- to establish the data's accuracy;
- where our use of the information is unlawful but erasure is not required;
- where you need us to hold the information even if we no longer require it to achieve the purposes for which it was collected, as you need it to establish, exercise or defend legal claims; or
- you object to our use of your Personal Information but we need to verify whether we have overriding legitimate grounds to use it.

Portability

You have the right to request the transfer of the Personal Information we hold about you to you or to a third party that you nominate. We will provide your Personal Information to you (or your nominee) in a structured, commonly used, machine-readable format.

Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdrawal of consent

Where we are relying on consent to process your Personal Information you can withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw consent. If you withdraw consent, we may not be able to provide you certain products or services. We will advise if this is the case at the time you withdraw your consent.

Specific provisions relating to individuals in the U.S.A.

Appeal Process

For United States residents, depending on your state of residency, you may appeal our decision in the event we deny your data request. To submit an appeal you may contact us by email with the subject line “Data Rights Appeal”. You will receive confirmation of the action being taken regarding your appeal within 60 days of receipt of your appeal.

Right to lodge a complaint

Without prejudice to any other administrative or judicial remedy, you may lodge a complaint with a competent supervisory authority if you believe that the processing of your Personal Information infringes applicable data protection laws. A non-exhaustive list of contact details of supervisory authorities in various jurisdictions can be found below.

However, prior to lodging a complaint with a supervisory authority, we invite and encourage you to contact us directly using the contact details set out below if you have any questions or concerns about how we process your personal information.

Global Privacy Control

The Global Privacy Control (GPC) lets you set an opt-out preference at the browser level of your device. If you have enabled the GPC on your browser we will automatically receive a signal of your intent to opt-out of the sharing of your Personal Information.

California’s Shine the Light Law

California Civil Code Section 1798.83 permits users of our Website (https://www.blundstone.com/) that are California residents to request certain information regarding our disclosure of the information you provide through our Website to third parties for their direct marketing purposes. To make such a request, please contact us at the information provided below.

Personal Information Categories Chart under California Consumer Privacy Act (CCPA)

As required under the CCPA, we have included below a list of the categories of personal information we have collected and disclosed for a business purpose in the preceding 12 months. These categories are defined under Cal. Civ. Code 1798.140(v)(1):

Personal Information Category	Examples of Information Category	Is Category Collected?	Business Purpose Disclosures	Category of Third-Party Recipients
A: Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, or other similar identifiers	Yes	Account processing; invoice and payment processing; product and services recommendations	Data Analytics Providers; advertising networks; Operating Systems & Platforms; Social Networks; Billing and Payment Processors
B: California	A name, signature,	Yes – however	Account processing;	Data Analytics

Customer Records personal information categories	Social Security number, physical characteristics or description, address, telephone number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number. Some personal information included in this category may overlap with other categories	generally limited to name only. *Also refer to "Employment Data" and "Financial Data" under the section titled "What Personal Information is Collected?"*	invoice and payment processing; product and services recommendations	Providers; advertising networks; Operating Systems & Platforms; Social Networks; Billing and Payment Processors
C: Protected classification characteristics under California or federal law	Information such as age (for those 40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, and sex	No	N/A	N/A
D: Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Yes	Product and services recommendations	Data Analytics Providers; advertising networks
E: Biometric Information	Behavioral characteristics, including imagery of the face and voice recordings.	No	N/A	N/A
F: Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	Yes	Product and services recommendations	Advertising Networks; Data Analytics Providers; Operating Systems & Platforms
G: Geolocation data	IP address-based location information and GPS data	Yes	Product and services recommendations	Service providers; advertising partners; analytics partners and other parties you may authorize
H: Sensory data.	Audio, Electronic, visual, thermal, olfactory, or similar information	No	N/A	N/A

I: Professional or employment-related information	Current or past job history or performance evaluations.	No *Also refer to "Employment Data" under the section titled "What Personal Information is Collected?"*	Job application processing and background checks	Service providers and job application processors
J: Non-public education information	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial Information, or student disciplinary records	No *Also refer to "Employment Data" under the section titled "What Personal Information is Collected?"*	Job application processing and background checks	Service providers and job application processors
K: Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes	Product and services recommendations	Advertising Networks, Data Analytics Providers; Operating Systems & Platforms
L: Sensitive Personal Information	California: SSN, driver's license, State ID, precise geolocation, racial or ethnic origin or genetic data	No	N/A	N/A

TO CONTACT US AND OUR PRIVACY OFFICER

Enquiries or a complaint about the way we manage personal information, or to seek to exercise privacy rights in relation to the Personal Information we hold, should be directed to our Privacy Officer as follows:

By mail:	**Attention: Privacy Officer** Blundstone Australia Pty Ltd 88 Gormanston Road, Moonah, Tasmania 7009, AUSTRALIA
By email:	dataprivacy@blundstone.com.au
By telephone:	+61 03 6271 2200

Date Approved: 2 September 2026.

Date of Review: 1 September 2029

While we endeavour to resolve complaints quickly and informally, formal privacy complaints can be made in writing to our Privacy Officer by email or mail as above. We will acknowledge a formal complaint within 10 working days.

Where you are not satisfied with our response, you may lodge a complaint with the following authorities, according to their location:

Australia	Office of the Australian Information Commissioner (OAIC)	
	telephone:	1300 363 992
	web:	www.oaic.gov.au
	mail:	GPO Box 5218, Sydney NSW 2001, Australia
New Zealand	Privacy Commissioner	
	telephone:	0800803 909
	email:	enquiries@privacy.org.nz
	mail:	PO Box 10-094, The Terrace, Wellington 6143, New Zealand
California, USA	Attorney General's Public Inquiry Unit	
	telephone:	(916) 210-627 / (800) 952 522
	web:	www.oag.ca.gov
	mail:	PO Box 944255 Sacramento CA 94244-2550
Colorado, USA	Attorney General	
	telephone:	(720)-508-6000
	web:	https://coag./gov/resources/colorado-privacy-act
	mail:	1300 Broadway 10th Fl, Denver CO 80203
Connecticut, USA	Attorney General	
	telephone:	(860)-808-5318
	web:	https://portal.ct.gov/AG/Common/Complaint-Form-Landing-page
	mail:	165 Capitol Avenue, Hartford CT 06106
Virginia, USA	Attorney General	
	telephone:	(814) 786-2071
	web:	www.oag.state.va.us
	mail:	202 North 9th Street, Richmond VA 23219
Other US states	Contact your state Attorney-General's office for further information	
European Union	Data Protection Authority	
	web:	https://edpb.europa.eu/about-edpb/board/members_en

Definitions

Term	Definition
Blundstone Group	Blundstone Australia Pty Ltd, Blundstone (U.S.A.) Inc and Blundstone New Zealand Ltd
our Websites	https://www.blundstone.com/, https://www.blundstone.com.au, https://www.blundstone.co.nz and https://www.johnbull.co.nz
Personal Information	any information about an individual from which that person can be identified, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual
processing	includes the sale or sharing of Personal Information by us to or with a third party
Sensitive Information	Personal Information that includes information or an opinion about an individual's racial or ethical origin, political opinions, or associations, religious or philosophical beliefs, trade union

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Date of Review: 1 September 2029

	memberships or associations, sexual orientation or practices, sex life, criminal record, health or genetic information or biometric information

Applicable laws

- Australian Privacy Principles under the Privacy Act 1988 (Cth);
- Privacy Principles under the Privacy Act 2020 (New Zealand);
- General Data Protection Regulation (EU) 2016/679; and
- Various US state laws, including the California Consumer Privacy Act (California Civil Code), California Privacy Rights Act, Colorado Privacy Act, Connecticut Data Privacy Act, Delaware Data Privacy Act, Florida Information Protection Act, Indiana Consumer Data Protection Act, Iowa Consumer Data Protection Act, Kentucky Consumer Data Protection Act, Maryland Online Data Privacy Act, Minnesota Consumer Data Privacy Act, Montana Consumer Data Privacy Act, Nebraska Data Privacy Act, New Hampshire Data Privacy Act, New Jersey Data Protection Act, Oregon Consumer Privacy Act, Rhode Island Data Transparency and Privacy Protection Act, Tennessee Information Protection Act, Texas Data Privacy & Security Act, Utah Consumer Privacy Act, and the Virginia Consumer Data Protection Act.

Review

This Policy will be reviewed every 3 years, or earlier if required to ensure relevance, accuracy, and alignment with regulatory requirements or organisational objectives.

Version control

Version	Date	Author	Owner	Description of Change	Approved By	Approval Date	Next Review Date
1.0	09.07.2026	Group Manager Legal & Compliance	Group Manager Legal & Compliance	Updates to policy format Updates to content to align with US legislative requirements	CEO	02.09.2026	01.09.2029

For administrative purposes: Distribution of policy requirements

Distribution Group	Mandatory or Non-Mandatory	Read & Acknowledge Required	Platform	Frequency of distribution
All employees	Mandatory	Yes	Employment Hero	On approval and as updated
Public	Mandatory	No	AU, US and NZ websites	On approval and as updated

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