

# Privacy Policy

## Our Privacy Commitment

The Glo Light Pty Ltd ACN 099 730 177, Trading as Lighting Partners Australia ABN 18 531 348 549, is committed to managing your personal information openly and transparently and to keeping your personal information safe. We will take all necessary measures to fulfil this commitment, including to:

- comply with the Australian Privacy Principles ("APPs");
- ensure that we manage your personal information openly and transparently;
- only collect personal information from you that we need in order to offer you the best possible service and customer experience;
- tell you how we might use your personal information;
- let you know if we need to disclose your personal information to anyone else (including anyone overseas) and if so, in what circumstances this might occur;
- keep your personal information secure;
- promptly respond to any request by you not to receive direct marketing material from us;
- make sure your personal information is kept accurate and up to date and to properly dispose of any personal information which is no longer required by us; and
- ensure that, where appropriate, you can access and correct your personal information.

## About this Policy

This policy is intended to explain clearly and in plain language some of the key processes and procedures that we have implemented to manage your personal information, to protect your privacy and to comply with the Privacy Act 1988, the Privacy Amendment (*Enhancing Privacy Protection*) Act 2012 ("Act") and the Australian Privacy Principles.

References to "our", "us" and "we" in this policy are references to Glo Light Pty Ltd ACN 099 730 177, Trading as Lighting Partners Australia ABN 18 531 348 549 and its related entities.

[www.lpalighting.com](http://www.lpalighting.com) ("Website") is owned and administered by Glo Light Pty Ltd ACN 099 730 177, Trading as Lighting Partners Australia ABN 18 531 348 549.

This policy gives a broad overview of our policies in relation to privacy but if you require further information, you are welcome to contact us or to read any of the privacy statements or notices that will be issued to you as and when personal information is collected.

You must read this privacy policy before providing us with any personal information or using the Website. By providing us with your personal information and using the Website, you are confirming your agreement to the policies and procedures described in this privacy policy.

## Do we use your personal information for marketing purposes?

As part of the services that we provide to you, we may:

- (a) use personal information that we have collected about you to identify a product or service that may benefit you;
- (b) contact you from time to time to let you know about a product or service that we believe you might be interested in; and
- (c) disclose your personal information to our related entities, any one or more of the Recipient Parties or to our business partners (including third party facilitators) to enable them to tell you about a product or service that you might be interested in.

By providing your personal information to us or by agreeing to accept the terms of this privacy policy, or both, you consent to your personal information being included in our database to be used for direct marketing purposes, including those described above, however, you can opt-out, unsubscribe or make a request not to receive direct marketing communications from us, by calling us on 03 8416 1500 or by writing to us at LPA, 16A Palmer Parade, Cremorne Vic 3121 or by logging such a request through the Website at any time. Additionally, each direct marketing communication, including all emails and SMS, will include an opt-out or "unsubscribe" option which will immediately indicate to us that you no longer wish to receive materials of this kind. If you make a request not to receive direct marketing communications from us, we will stop sending you these materials.

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You may make a request that we do not disclose your personal information to facilitate direct marketing by another organisation and you may request that we provide you with the source of any personal information we use for direct marketing purposes. Any such requests will be actioned within a reasonable period and there will be no charges to you for making, or to you from us actioning, such requests.

## How do we store your personal information?

We have implemented appropriate processes and techniques (including physical security such as locks and security systems and computer and network security, including firewalls and passwords) to protect personal information from loss, misuse and interference and from unauthorised access, modification or disclosure. In addition, access to your personal information is limited to those who specifically need it to conduct their responsibilities.

We and our third party service providers take all necessary steps to destroy or permanently de-identify your personal information where it is no longer required and to protect your personal information from loss, misuse and interference and from unauthorised access, modification or disclosure.

While care is taken to protect your personal information on the Website, unfortunately no data transmission over the Internet is guaranteed as 100% secure. Accordingly, we cannot ensure or warrant the security of any information you send to us or receive from us online. This is particularly true for information you send to us via email as we have no way of protecting that information until it reaches us. Once we receive your personal information, we are required to protect it in accordance with the Act.

## Maintaining your personal information

We take reasonable steps to ensure that:

- (a) the information that we collect about you is accurate, complete and up-to-date at the time of collection;
- (b) when we use your personal information, it is accurate, up-to-date, complete and accurate at the time of use; and
- (c) if we disclose your personal information, it is accurate, up-to-date, complete and accurate at the time of disclosure.

## Will we disclose your personal information to anyone overseas?

There may be circumstances where we need to disclose personal information that we hold about you to a third party overseas ("Overseas Recipients"). This may occur, for example, where we have a database or server hosted outside Australia or where you are interacting with an application which is based overseas.

Prior to us disclosing your personal information to an Overseas Recipient, we have an obligation under APP 8.1 to take reasonable steps to ensure that the Overseas Recipient does not breach the APPs in relation to your personal information, as well as an obligation under APP 6 to only disclose your personal information to an Overseas Recipient for the primary purpose for which that personal information was collected (unless an exception applies under APP 6) (the "Overseas Disclosure Obligations").

We will take all reasonable steps to satisfy our Overseas Disclosure Obligations.

The countries to which we are most likely to send your personal information include the United States of America and the United Kingdom.

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## How can you contact us?

Please find below our contact details. Please do not hesitate to contact us in relation to any privacy-related concerns and we will use our best endeavours to address any such concerns thoroughly and in a timely manner.

If it is practical to do so, you can contact us without identifying yourself. However, if you choose not to identify yourself, it may be more difficult for us to assist you with your enquiry. This will depend on the nature of your enquiry.

LPA

Postal address: 16A Palmer Parade, Cremorne Vic 3121

Phone: 03 8416 1500

Please note that the Act contains certain exemptions which may permit us to use your personal information in a particular way if specific circumstances arise. Any such exemptions under the Act will take priority over this privacy policy to the extent of any inconsistency.