

## **POLICIES AND STANDARD WORK INSTRUCTIONS**

### **Australian and New Zealand Privacy Policy**

#### **Introduction**

This Privacy Policy covers how United Technologies Corporation (UTC)'s Australian and New Zealand subsidiaries and affiliates that operate under the UTC Climate, Controls & Security reporting unit, including Interlogix, Kidde, Quell, Onity, Edwards and UHS Systems (together, "F&SP") handle and protect personal information, and how individuals can access and correct their personal information or complain about a breach of their privacy.

Specific information about how F&SP collects, uses and discloses credit-related personal information is contained in the section titled 'Collection, Use and Disclosure of Credit-Related Personal Information'.

This Privacy Policy does not apply to F&SP employees' and contractors' personal information, although it does apply to job applicants' personal information. A separate Employee and Contactor Privacy Policy is provided to employees and contractors.

This Privacy Policy contains the following sections:

- Collection of Personal Information
- Use of Personal Information
- Disclosure of Personal Information
- Cookies and Web Beacons
- Collection, Use and Disclosure of Credit-Related Personal Information
- Storage and Security of Personal Information (Including Credit-Related Personal Information)
- Access to and Correction of Personal Information (Including Credit-Related Personal Information)
- Privacy Complaints
- Notification of Changes to this Privacy Policy
- How to Contact Us

#### **Collection of Personal Information**

##### ***The types of personal information we collect***

The personal information F&SP collects will depend on our relationship with you and may include your name, personal and work contact details (including post code), date of birth, age, gender, work details (such as organisation and position) and banking details.

If you are a job applicant, we may also collect your education and qualifications, employment history, professional associations and any other information on your resume.

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#### ***How we collect personal information***

F&SP collects personal information from you when interact with us (including through our websites), such as when you purchase one of our products or services, register your product, participate in one of our surveys or apply for a position with us. If you use one of our monitoring services, we will also collect personal information that is automatically transmitted to us from the monitoring device.

We may also collect your personal information from third parties such as:

1. our suppliers, service providers, consultants, customers, contractors and subcontractors (such as customer service operators);
2. our related bodies corporate; and
3. public sources.

If you are a job applicant, we may also collect your personal information from your past and current employer and any referees you provide.

#### **Use of Personal Information**

F&SP uses the personal information we collect to provide and administer our products and services (including contacting you about products and services you have purchased and ensuring our services work with the rollout of the national broadband network in Australia), to create and publish website or application content most relevant to you, to verify your identity, to comply with our legal obligations and to alert you to product updates, special offers, promotions and updated information regarding new services or programs available from F&SP.

If you are a job applicant, we use your personal information to assess your application for employment and to comply with our legal obligations.

#### **Disclosure of Personal Information**

F&SP may disclose your personal information to third parties to enable us to provide our products and services and comply with our legal obligations, including:

1. our suppliers, service providers, consultants, customers, contractors and subcontractors (such as customer service operators and shippers);
2. our related bodies corporate;
3. emergency services (i.e. police, fire brigade or ambulance);
4. the police in non-emergency situations, such as to assist with investigations into criminal activity; and
5. a court during court proceedings.

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We may also disclose your personal information to government entities and national broadband network retail service providers or telecommunication service providers (to ensure our services work with the relevant networks).

If you are a job applicant, we may also disclose your personal information to your referees and others when carrying out employment history and qualifications checks.

#### ***Disclosure to recipients outside of Australia***

We may disclose personal information to overseas recipients, including related bodies corporate and service providers in India, China, Singapore, Israel, France, the United Kingdom and the United States of America.

Where we disclose personal information to an overseas recipient, we will take reasonable steps to ensure that the recipient complies with the applicable Australian Privacy Principles.

#### **Cookies and Web Beacons**

With both cookies and web beacon technologies (as described below), the information that we collect and share is anonymous and not personally identifiable. It does not contain your name, address, telephone number or email address.

#### ***Cookies***

Like many companies, we use browser cookies on our websites. Browser cookies are bits of text that are placed on your computer's hard drive when you visit certain websites. We use browser cookies to tell us, for example, whether you have visited us before or if you are a new visitor and to help us identify site features in which you may have the greatest interest. Browser cookies may enhance your online experience by saving your preferences while you are visiting a particular website. The "help" portion of the toolbar on most browsers will tell you how to stop accepting new browser cookies, how to be notified when you receive a new browser cookie, and how to disable existing browser cookies. Remember though, without browser cookies, you may not be able to take full advantage of all our websites' features.

For each visitor to a F&SP website, webpage or mobile application (**Site**), F&SP's web server automatically recognises and stores information, such as the visitor's IP address/domain name combination and any referring websites. We use this information to understand visitor traffic patterns through our websites for purposes such as enhancing their usability. Your computer provides this information automatically each time you log on, unless you have activated blocking technology available in some browsers.

Some newer browsers have incorporated "Do Not Track" features. Most of these features, when turned on, send a signal or preference to the web sites you visit indicating that you do not wish to be tracked. Those sites (or the third party content on those sites) may continue to engage in activities you might view as tracking even though you have expressed this preference, depending on the sites' privacy practices. If your browser or similar mechanism gives one of our Sites a "do

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not track” signal, the Site may not honour it because of the tracking described in this section (“Approved Sharing”). If your settings and our relevant Site are nuanced enough to allow the Approved Sharing but also preclude tracking for behavioural advertising by third parties, the Site will make commercially reasonable attempts to honour your settings. However, F&SP provides no warranties or guaranties about the effects of any opt-out choice that you make because of things such as this: (a) such nuanced treatment isn’t necessarily available or effective for any or all browsers, mechanisms or technologies and our attempts might or might not be effective to preclude tracking at all or over any particular period of time; (b) not all third parties will necessarily honour our attempts; (c) F&SP does not control third parties or technologies (even if we have a contract), and (d) technologies used by you and third parties will change from time to time and our attempts might or might not be effective for each technology.

#### ***Web Beacons***

We use IP addresses to analyse trends, administer our Sites, track user movement, and gather broad demographic information for aggregate use. Certain pages on our Sites may contain “web beacons” (also known as Internet tags, pixel tags and clear GIFs). These web beacons allow third parties to obtain information such as the IP address of the computer that downloaded the page on which the beacon appears, the URL of the page on which the beacon appears, the time the page containing the beacon was viewed, the type of browser used to view the page, and the information in cookies set by the third party. We use log files to store the data that is collected through web beacons. F&SP also uses third party web beacons to help manage online advertising. These web beacons are provided by our ad management partners, such as Google Analytics and Omniture. These files enable Google Analytics and Omniture to recognize a unique cookie on your web browser, which in turn enables us to learn which advertisements bring users to our websites. The cookie on your web browser was placed by F&SP, or by another advertiser who works with Google Analytics. For more information about Google Analytics, including information about how to opt out of these technologies, go to [www.google-analytics.com](http://www.google-analytics.com). For more information about Omniture, including how to opt out of these technologies, go to [www.omniture.com](http://www.omniture.com).

#### **Collection, Use and Disclosure of Credit-Related Personal Information**

We provide credit in connection with the supply of our goods and services. For this purpose, we collect credit-related personal information about individuals that apply for credit with us or who provide guarantees in respect of credit provided by us. We also collect credit-related personal information about directors of companies that apply for credit with us or provide guarantees in respect of credit provided by us.

We explain below the types of credit-related personal information we collect and how we use and disclose this information.

#### ***The types of credit-related personal information we collect***

The kinds of credit-related personal information F&SP may collect about you include:

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1. your name, personal and work contact details (including post code), date of birth and driver's licence or licence number;
2. information about assets you own and any security held against those assets;
3. information about court proceedings to which you are or were a party, and any court orders made against you, that affect your ability to make payments to us;
4. any other information on your credit check report, such as credit providers you have commercial or consumer credit with and your payment history with these providers (including any defaults on payments);
5. information about your history of payments, including any defaults on payments, for the goods and services we provide to you;
6. information about your interactions with our collection agencies;
7. any information about you provided by your trade referees;
8. where applicable, information about any relevant insolvency event; and
9. confirmation that you are not listed in the United States as being a criminal or terrorist or being involved in a criminal or terrorist organisation.

#### ***How we collect credit-related personal information***

F&SP collects credit-related personal information about you when you fill out a credit application form. We may also collect this information from other sources, such as:

1. credit reporting bodies;
2. any trade referees you provide;
3. publically available sources;
4. our contact for the company for which you are a director (when the company applies for credit or notifies us of a change in directorship);
5. our collection agencies and external solicitors;
6. if relevant, a company's administrators and liquidators; and
7. government bodies, such as the Australian Securities and Investments Commission, and the United States Government.

If you are a guarantor, we may also collect your name and contact information from the credit applicant.

#### ***Use of credit-related personal information***

If you apply for and/or receive credit from F&SP, F&SP uses your credit-related personal information to assess your application for credit, manage your credit account and manage the collection of overdue payments (if necessary).

If you are a guarantor, F&SP uses your personal information to assess whether to accept you as a guarantor and invoke the guarantee (if necessary).

#### ***Disclosure of credit-related personal information***

We may disclose your credit-related personal information to credit reporting bodies, our collection agencies and our external solicitors.

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We may disclose credit-related personal information to overseas recipients, including service providers in India.

Where we disclose credit-related personal information to an overseas recipient, we will take reasonable steps to ensure that the recipient complies with the applicable Australian Privacy Principles.

#### ***Other information about our handling of your credit-related personal information***

The following sections of this Privacy Policy apply to all personal information, including credit-related personal information.

#### **Storage and Security of Personal Information (Including Credit-Related Personal Information)**

F&SP stores your personal information in a combination of:

1. hard copy files with restricted physical access; and
2. electronic files stored on local servers owned by F&SP.

F&SP takes reasonable security precautions to protect our subscribers' personally identifiable information that we collect from misuse, interference and loss and from unauthorised access, use, modification and disclosure.

Our service providers are contractually restricted from using or disclosing any personal information we disclose to them except as necessary to perform services on our behalf or to comply with legal requirements.

#### **Access to and Correction of Personal Information (Including Credit-Related Personal Information)**

You can request to access and/or correct your personal information by contacting us on the contact details at the end of this Privacy Policy. You may also request to access credit eligibility information about an individual held by us if you are assisting the individual deal with us and are authorised in writing by the individual to make the request.

We may request that you provide evidence to satisfy us as to your identity and, if you are not the individual about whom the personal information relates, your entitlement to access the information.

We may require you to pay our reasonable costs of supplying you with access to your personal information (such as retrieval costs). However, we will not charge you for making an access or correction request or to correct your personal information.

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We will deal with your request for access and/or correction as soon as reasonably practicable. If the request relates to [credit-related personal information](#), we will generally provide access or correct the information within 30 days, unless:

- in respect of access requests, unusual circumstances apply; or
- in respect of correction requests, we agree another period with you in writing.

In certain circumstances we will not be able to provide you with access to or correct your personal information. In these circumstances we will provide you with a written notice explaining the reasons for our refusal and stating actions you may take if you are not satisfied with our response.

### **Privacy Complaints**

If you wish to make a complaint about how we have handled your personal information (including about our compliance with the *Privacy Act* or the Privacy (Credit Reporting) Code), please contact us on the contact details set out at the end of this Privacy Policy. We may ask you to put your complaint in writing.

We will investigate and respond to your complaint as soon as is practicable after we receive it.

If your complaint relates to credit-related personal information, within 7 days we will acknowledge your complaint in writing and explain how we will deal with it. Depending on the nature of your complaint and the information to which it relates, we may need to consult with and/or notify particular credit reporting bodies or other credit providers. We will advise you of our decision in relation to your complaint in writing within 30 days of your complaint or such longer period as you agree in writing.

You may also contact:

1. if you are in Australia, the Commonwealth Privacy Commissioner. If your complaint relates to our handling of your medical information in NSW or VIC you may also complain to the NSW Privacy Commissioner or the Victorian Health Services Commissioner; or
2. if you are in New Zealand, the Privacy Commissioner or an Ombudsman.

### **Notification of Changes to this Privacy Policy**

This Privacy Policy may be updated periodically to reflect changes in our information handling practices. We will post a prominent notice on our websites to notify you of any significant changes to our Privacy Policy and indicate at the top of the Policy when it was most recently updated.

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#### **How to Contact Us**

If you have any questions about this Privacy Policy or would like to request to access or correct your personal information or make a privacy complaint, please contact us using the following details:

Privacy Officer  
UTC Climate, Controls & Security  
Locked Bag 2007  
North Ryde BC NSW 1670

[Privacy.Officer@chubb.com.au](mailto:Privacy.Officer@chubb.com.au)