

Woolworths Group Privacy Policy

Policy effective: 21 December 2022

Expiry Date: **08 July 2024**

Woolworths Group Privacy Policy

We value your trust and take the protection of your personal information very seriously. This document outlines the way in which we collect, hold, secure, use and share your personal information. We encourage you to read it, so that you are comfortable with what we do with your personal information.

If you have any questions regarding its contents, we invite you to contact our Privacy Office, the contact details for which are contained in Section 18 below.

About Woolworths Group

Woolworths Group (referred to as 'Woolworths', 'we' or 'us') includes Woolworths Group Limited ABN 88 000 014 675 and its subsidiaries.

This Privacy Policy applies to all Australian Woolworths Group businesses unless that business has adopted a separate policy. This means that this Privacy Policy applies to Woolworths Supermarkets, Metro, Everyday Rewards, BIG W, Healthy Life and Primary Connect. However, MyDeal.com.au and Pet Culture, for example, maintain their own privacy policies (accessible on their respective websites).

Endeavour Group (comprising Endeavour Group Limited and its subsidiaries including BWS) was part of the Woolworths Group prior to July 2021 but is no longer related to Woolworths Group and has its own privacy policy, accessible on Endeavour Group's website.

1. What is covered by this Privacy Policy?

This Privacy Policy outlines our personal information management practices, including how we collect, hold, secure, use and share your personal information. Specifically:

- the kinds of personal information we collect and hold
- how we collect and hold it
- the purposes for which we collect, hold and use it
- how we secure it
- how, and with whom, we share your personal information, including overseas, and why
- your right to access and correct it
- how you may contact us if you wish to make a complaint or enquire about privacy matters.

There are some matters to which this policy does not apply. Please refer to Section 16 below.

2. What is personal information?

As defined by the Privacy Act 1988 (Cth), "personal information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

Any time we use the term "personal information" in this policy, we are referring to this legal definition of the term.

3. What kinds of personal information does Woolworths collect and hold and how does Woolworths collect it?

We always want to provide you with the highest level of service, so we collect and hold personal information that helps us to provide the information, goods or services you might be looking for. If we do not collect the information, we may not be able to provide these things.

We collect your personal information directly from you when you activate or use our services, interact with us, either in person, over the telephone or electronically (e.g. via websites, apps, social media posts, chats, telephone, emails and/or SMS) or as otherwise permitted by law. We may also collect personal information about you from third parties, as described in the 'Other sources' section below.

Below are some examples of personal information we may collect from you and how we collect that information:

Loyalty program: When you register to participate in Everyday Rewards or when you use your Everyday Rewards card:

- your contact details (including your name, email addresses, telephone numbers and residential and delivery addresses) date of birth and gender
- payment card and transaction details
- information about purchases for which you earn Everyday Rewards points as well as your use of those points.

Shopping with us: When you shop with us, including online, or browse our sites or apps:

- your contact details, delivery address, and loyalty card number
- information about your orders and purchases, including what, how, and when you buy from us
- we may ask for your ID, such as your driver's licence, if you purchase alcohol or tobacco or other forms of identification so that you can use certain services we provide
- whether you have taken up or subscribed to any of our offerings such as clubs, subscriptions or loyalty programs, financial services products including insurance and credit cards or our apps
- information about your online browsing behaviour on our internet sites and apps, including promotions you activated, as well as items you have added to your carts
- information collected and held via our secure financial systems about the payment method you use for your purchases from us
- like many websites, tracking technologies, such as "cookies", are used to obtain certain types of information such as application activities, current location of your device, type and version of your browser, your device ID and other device metrics when you visit our websites, apps or certain third parties' websites or apps (see Cookies Statement for details)
- images and videos that you post online to facilitate our service provision or sales promotions
- information we collect via our apps on mobile devices or smart devices (e.g. smart watches), for example the current location of your device,

type and version of your browser and, your device ID and other device metrics, as allowed by your device permissions.

Commercial messages: When you contact us or we contact you to take part in competitions, promotions, testimonials, reviews, surveys, focus groups or make other enquiries:

- your contact details and loyalty card number
- whether you activated a promotion
- the content of online communications with you, including competitions, promotions, feedback, reviews, ratings, comments and images included on any of our websites, apps or social media pages or any of our other digital services
- an electronic copy of the written communication or voice recording of the conversation.

At our stores and sites: When you visit us in person, including for events:

- your contact details and loyalty card number for in-store services such as pick up, home delivery or special orders
- we may ask for your ID, such as your driver's licence, if you purchase alcohol or tobacco
- cameras (including security and team safety cameras) or similar technology may record footage and other data which may identify you
- your contact details if security or team members are investigating whether you may have breached any store procedures or if you are injured in any one of our stores or are witness to an incident
- any other information that you provide to us (for example if you choose to leave your details with us for recruitment or other purposes).

Gift cards: When you purchase a Woolworths Group Gift Card (e.g. a WISH Gift Card) from us:

- your contact details
- your gift card 'Card Number' and the corresponding 'PIN'
- balance on the gift card and its transaction history.

Woolworths Mobile: When you use Woolworths Mobile Services:

- metadata generated through your usage (e.g. the date, time and duration of your communications), and information required for us to discharge our obligations relating to law enforcement under applicable laws in relation to telecommunications services that we provide
- your personal information when you activate or use a telecommunication service we provide, or when we are otherwise required by law to collect personal information about you.

Other sources: From time to time we may also collect personal information about you from other sources to help us supplement our records, improve the personalisation of our service to you, provide services to third parties such as Endeavour Group (the owner of BWS liquor stores) and detect fraud. For example, we may collect personal information from:

- Everyday Rewards Partners to confirm your membership of the loyalty program, e.g. to convert Everyday Rewards points to your Qantas membership
- information service providers to improve data quality e.g. we validate addresses with Australia Post to improve your delivery experience
- Endeavour Group, in order for Woolworths to provide services to BWS, such as when Woolworths acts as agent for Endeavour Group when you buy liquor at woolworths.com.au or facilitates collection of BWS products via Pick Up or Direct to Boot.
- financial services organisations for fraud prevention.

4. Do I have to provide my name?

For many of our services, you generally have the option not to give us your name and can use a pseudonym if you prefer.

We may need your real name and a valid ID for specific purposes or where we are required to ask by law.

5. Can I provide someone else's personal information to Woolworths?

Yes, you may provide someone else's personal information to us, for example,

- when you purchase a gift for others; or
- place an order on someone else's behalf.

You must have their consent beforehand and we may ask you to provide evidence of that consent. You should not provide someone else's information if you don't have their consent, or for malicious purposes.

6. Do you collect my sensitive information?

Some of our products and services, like health-related and insurance services, may require us to collect (or result in us collecting) your "sensitive information" from you or from other sources. 'Sensitive information' is defined in the Privacy Act and includes information like health information. We only collect sensitive information when you provide consent to the collection, or if the collection is permitted by law.

7. How does Woolworths secure my personal information?

Your personal information is important to us. We design our systems with your security and privacy in mind.

Any personal information we hold is generally stored electronically in computers or cloud systems operated by us or by our service providers. We implement a range of information security measures and encryption protocols when we handle your personal information to protect it from unauthorised access, loss, misuse or wrongful alteration.

We may collect information from your current device using cookies or other technologies, including your online browsers or apps to protect your account security. See Section 3 for examples of what kinds of information we may collect.

We use security measures such as physical and technical security access controls or other safeguards, information security technologies, policies, procedures and training programs to ensure the security of your personal information.

We protect your payment card details with encryption and hashing methods. We ask that you not include your full card details when you communicate with us via email, SMS or chat messages. If we have to make a reference to your payment card number, we will only refer to the last four digits in any form of written communications.

8. For what purposes does Woolworths collect, hold and use my personal information?

We primarily collect, hold and use your personal information to provide services, or to promote and sell goods and services that you have requested, or which we think may be of interest to you. This may also include products and services provided by third parties.

We may also collect, hold and use your personal information for:

- Managing your online shopping accounts: To fulfil your online orders and maintain your accounts on our websites and apps.
- Managing your Everyday Rewards account: To give you points and rewards for shopping with us, and to provide you customer support when needed.
- Communication: To send you offers and other communications that may be of interest to you.
- Personalisation: To identify your preferences, to recommend and advertise features, products and services that may be of interest to you, and to personalise your experience with Woolworths.
- Investigation: To assist in responding to your complaints or enquiries and to undertake investigations.
- Security and fraud detection: To protect our team members, customers, premises and systems from malicious or dangerous activity and to verify your identity and to detect fraud activities. We may conduct auditing and monitoring of transactions and financial engagement.
- Improvement of our services and customer experience: To test, review and improve the usability, functionality and effectiveness of our systems, products and services, for example call recordings for quality and training purposes.
- Corporate services: To allow us to provide support services, including recruitment, fraud monitoring and logistics services to specific third parties such as Endeavour Group.
- Analysis and reporting: To understand the preferences and shopping patterns of our customers and to produce other insights about our performance. Typically this involves grouping customers into segments with other customers who share similar demographics and shopping behaviours and the generation of insights at the segment level.
- Purposes permitted or required by law.

9. Who does Woolworths share my personal information with and why?

Like most businesses, we work with third parties so we can provide you with better experiences. This means we may share personal information we hold. This may include sharing information:

- with third parties who work with us to provide you products and services. For example, we need to provide your address to delivery providers who fulfil your online orders, and we need to pass on your order details to Everyday Market Partners who sell products on Everyday Market. We also need to pass on your personal information to third parties that provide services that you request, for example, the insurers who underwrite Woolworths Insurance, and Telstra which provides you with your Woolworths Mobile service.
- with Everyday Rewards Partners (such as Qantas, Ampol and BWS). Sharing information with Everyday Rewards Partners helps us run the Everyday Rewards Program. It also means your points are correctly allocated, and that you can receive personalised offers and experiences from us and our Everyday Rewards Partners.
- for the purpose of marketing and advertising. We use your personal information to show you relevant advertising from us and third parties. For example, to help personalise the ads you see when browsing or on social media, we share certain information with digital platforms like Google and Meta to create audiences with common interests. We then use these groupings to tailor our advertising for a given audience.
- with related bodies, business units and brands within the Woolworths Group. This is so we can give you a seamless and personalised experience while interacting with the Woolworths Group and we can run our business efficiently.
- with service providers who offer us operational and technical assistance to help us run our business. For example, this may include expert data companies (to help us understand our customers and business), businesses helping us improve data quality (such as Australia Post); print providers (to help with direct mail and card fulfilment); technology and software providers (who support our in-store, online and back-end systems); and payments providers.

- for security and fraud prevention. We work with financial service businesses and other service providers to help detect and prevent fraud, verify your identity and conduct credit checks when necessary.
- when we restructure our business. For example if we're involved in a takeover or merger, or sell any part of our business, we may need to share personal information.
- when legally permitted or required by law. For example, we may need to share personal information to assist with police investigations.
- when you provide your consent to sharing. We may share your personal information if you provide consent to such sharing or make a written request for us to share your information with a third party.

10. Marketing communications

When you register to hold an account or become a member of any Woolworths brand or program, we may send you commercial electronic messages and tailored advertising if you agree to let us do so. We may send you these messages via various channels and media (including by email, SMS, phone and mail, or via advertising on certain websites and social media), where you have not opted out of receiving such electronic messages from that Woolworths brand or program in that channel.

You can opt out of commercial electronic messages (e.g.) emails and SMS), by

- using the unsubscribe facility in any commercial electronic message; or
- for in-app notifications and advertising on certain websites and social media, by adjusting your device setting or online privacy settings.

Details on how to opt out of commercial electronic messages in relation to each Woolworths brand or program are contained within the terms and conditions for the relevant brand or program. It's important to note that opting out of receiving commercial electronic messages from any one Woolworths Group brand or program will not withdraw your consent to receive messages from other Woolworths Group brands or programs.

Regardless of whether you opt-out of any or all commercial electronic messages, you will still receive information we are required by law to provide to you or service-based communications. Each Woolworths Group brand and program sends different service-based communications (such as communications relating to terms and conditions, your account or your

orders). The terms and conditions for each brand and program sets out what is considered a service-based communication for that brand or program.

If you would like more information about how we may, or may not, send you commercial electronic messages, including in relation to specific Woolworths Group brands or programs, please see the terms and conditions of each of those Woolworths Group brands or programs.

11. How does Woolworths handle my personal information when I apply for a role (including as an employee or contractor)?

When you apply for a role with the Woolworths Group, we collect the personal information that you provide during that process, including in your application, such as your education and career history. Some roles may also require your health information or a criminal history check. We also collect demographic information, if you choose to provide it, to support our diversity and inclusion goals. This information will be used in relation to your current or future employment with us or contractor engagement with us.

In some cases we work with third parties to assist with certain aspects of the recruitment process, such as candidate assessments, recruitment services, and criminal history checks. Our job advertisements and recruitment processes set out further information about relevant third parties that we work with.

12. Does Woolworths share personal information overseas?

Some of our service providers, including data storage and technology service providers, may be located or use locations outside of Australia.

Where we share personal information overseas, we take steps to ensure that our service providers are obliged to protect this personal information in accordance with Australian legal requirements and that they are only permitted to use personal information for the purpose for which it is shared.

Our service providers or their data storage servers may be located, and may store your personal information from time to time, in a number of countries, including New Zealand, Switzerland, the United Kingdom, United States, India and Japan.

We may share your personal information overseas for reasons including:

- where we have made a business decision to engage with a service provider to assist us with certain functions, including data storage, combining and analysing data and processing data
- for disclosures between our Group companies. Our main business locations are in Australia and New Zealand, but some of our Group companies may be based in other countries from time to time
- when our business which collected your personal information is in a different country to your location
- when our supply to you necessarily involves overseas disclosures. For example, a reinsurer of some of our insurance offerings uses computer systems in Switzerland and the United States to store insurance-related personal information
- where you are involved with public liability issues, we may share your personal information with our overseas insurer or other supplier of relevant services in the course of managing those issues.

13. How can I access my personal information?

You have a right to request access to the personal information we hold about you. You can access or correct your personal information on your online profile via your online account at any time.

However, before we provide you with access to your personal information we may require verification of proof of identity. There is no charge to submit a request to correct or access your personal information, however, we may charge a reasonable fee for giving access to your personal information if your request requires substantial effort on our part.

If you would like a copy of the personal information held by us about you, please contact Woolworths Privacy Office using the details shown in Section 18 below.

14. How can I correct my personal information?

If you believe that any of your personal information is inaccurate, out of date, incomplete, irrelevant or misleading, please contact our Privacy Office. It is your right to have your personal information corrected.

15. How can I make a complaint about the management of my personal information?

If you would like to complain about a breach of the Australian Privacy Principles, you may contact our Privacy Office. We may ask you to put your complaint in writing and to provide relevant details. We may discuss your complaint with our personnel and our service providers and others as appropriate.

We will respond to your complaint in a reasonable period of time (usually within 30 days).

If you disagree with our decision, you may refer your complaint to the Office of the Australian Information Commissioner (OAIC) (whose contact details are as set out [here](#)).

16. What other privacy terms may apply?

There may be additional privacy notices and terms relevant to you depending on the nature of your dealings with us and on our particular businesses. There are additional privacy terms in our loyalty program and club membership terms and for use of our online sites, for example.

This policy does not apply to the personal information of our team members (employees and contractors) in their capacity as such, other than in the context described in Section 11.

17. How will I know if Woolworths makes changes to this privacy policy?

This Privacy Policy is current from 21 December 2022. We may change it periodically. If we propose to change this policy, we will display the proposed policy on www.woolworthsgroup.com.au at least 2 weeks before any change comes into effect.

Read [here](#) for a copy of our previous Privacy Policy (that was effective 28 June 2021 to 20 December 2022).

18. How to contact Woolworths

If you have any questions about our Privacy Policy or the way in which we collect, hold, secure, use or share your personal information, please contact us:

Phone: 1300 908 631

Email: privacy@woolworths.com.au

Post: Privacy Office

Woolworths Group Limited

PO Box 8000

BAULKHAM HILLS NSW 2153

19. More information

More information about privacy law and privacy principles is available from the OAIC and from their [website](#). The OAIC may be contacted using their contact details set out [here](#).