

Privacy Policy

INTRODUCTION AND PURPOSE

This Policy describes how we comply with our obligations under Information Technology Act, 2000 ("IT Act") read with the Information Technology (Reasonable Security Practices and procedures and Sensitive Personal data or information) Rules, 2011 of India ("Privacy Rules") and the privacy or data protection laws of other jurisdictions where we operate.

KAS Services India Private Limited (Hereinafter referred to as Anko) is committed to protecting the privacy of personal information. This privacy policy (hereinafter referred to as "Policy") explains how we collect, use and disclose information about our customers, suppliers (and their employees) and people who apply for employment with us. It also explains how to contact us if you have any questions about the management of your personal information or would like to access the personal information, we hold about you.

Personal information shall include any sensitive personal information collected in this Policy. Further, the terms 'personal information' and 'sensitive personal Information' shall have the same meaning as defined in the Privacy Rules.

POLICY APPLICATION

COUNTRY APPLICATION

Bangalore, India

POLICY

"We", "us", "our" means Anko.

This Policy describes how we comply with our obligations under the IT Act and the Privacy Rules and the privacy or data protection laws of other jurisdictions where we operate.

We may amend this Policy at any time by posting the updated version on our website.

We are not responsible for the privacy practices of sites that are linked to this website via hyperlinks, banner advertising or otherwise.

Consent

By submitting your personal information including any and all sensitive personal information to us, you are consenting to the processing of your personal information in India and abroad and to our use of your personal information as set forth in this Policy. If you are submitting personal information of third parties to us, you warrant and represent you have their consent to provide their personal information to us and will hold us harmless from and against claims by such individuals relating to our processing and use of such personal information within the terms of this Policy.

What information do we collect?

Generally, the personal information we collect about customers includes your name, home or work address, delivery address, phone number, payment, credit and billing information, and email addresses. We also collect demographic information, which is not unique to you, such as your postcode, age, gender and shopping preferences, interests and favourites. When you visit our websites, we may also collect information about your computer, including your IP address.

We also collect information about your use of our website using cookies. You can choose to decline cookies, but if you do so, you may not be able to fully experience our online interactive features.

We also collect personal information about:

 suppliers and their employees, including business name and address, contact details, and employee names, birthdates, addresses and working conditions (including hours and salaries, employee's nationality, job title, biometric information, medical information, financial information, including bank account and residency status); and potential employees (including names, addresses, contact details, employment and academic histories and the names of their referees).

Ordinarily, customers can purchase goods from us without disclosing personal information, but in this situation, we may not be able to provide you with the full range of services available.

How we collect and hold information

Where it is reasonable and practicable to do so, we collect your personal information from you directly when you purchase products or services from us or enter into arrangements with us or provide feedback/complaints to us. Depending on the product or service we provide to you, we may collect your personal information from third parties. Information about suppliers' employees is usually collected from the supplier. Information about potential employees is usually collected during the recruitment process.

If you are an agent who has, or is entering into, an arrangement to provide products and services on our behalf, we may also collect your personal information from credit reporting agencies. By providing your personal information to us, you confirm that you have reviewed this Policy and consent to the collection and use of your personal information as specified.

We take all reasonable steps to protect your personal information from misuse, loss, unauthorized access, modification or disclosure. Your personal information is stored on password protected servers located in access controlled secure locations.

Why we collect and how we use information

We collect and use your personal information to:

- sell, hire, deliver, administer, improve and personalize our products and services;
- source products for sale, transport products and ensure our suppliers are compliant with our ethical sourcing policy and applicable labour laws and standards;
- process payments and credit checks, to provide layby (layaway) services and to deal with your feedback or complaints and provide refunds and discounts;
- better understand our customers' requirements and preferences, conduct product and market research, personalise and improve our service and to provide offers that are of greater interest or benefit to you;
- to communicate with you and to operate the customer service centre;
- undertake and administer promotions, competitions, in-store events, marketing activities, direct marketing, database compilation, analysis of trends and demographics and other marketing or promotional activities;
- manage our stores, supply arrangements and inventory and administer our websites;
- protect against fraud and theft;
- complete other transactions with you or on your behalf;
- implementation, administration and management of the employment and related purposes, which may include but are not limited to administration of employee benefits and employment reviews and appraisals;
- recruit and assess future employees (including background checks); and
- maintain and update our records.

From time to time, we may also use your personal information to send you targeted news, offers and promotions of our products and services. If you do not wish to receive these communications, you can opt-out by contacting us at the address listed within the contacts section below.

How we disclose your information

We will only disclose information about you to third parties if required by law or legal process, to our advisers or to companies who are responsible for parts of our service delivery to delivery

companies, external call centres, suppliers and manufacturers, mail houses, recruitment firms and third-party fulfilment centres.

We may occasionally transfer your personal information, credit information (and credit eligibility information) to organisations located overseas, for example where:

- we use service providers based overseas;
- you have requested a product or service that involves an international element;
- we need to comply with foreign legal or regulatory requirements; or
- an international payment has been made.

How we secure your information

We require overseas recipients to use personal information only for the purpose provided and to implement strict confidentiality and data protection arrangements. Your information may also be stored on computer servers located outside of India. Any offshore disclosures will be to entities located in the United States of America, Australia and the Asia Pacific region (including but not limited to China, Bangladesh, Singapore, Vietnam and Hong Kong).

This Policy is an electronic record in terms of IT Act and the Privacy Rules which mandate publishing of the Privacy Policy on our website.

This website shall use the personal information collected from you in accordance with applicable laws, including but not limited to the IT Act and the Privacy Rules and use the data only for the purpose of completing the transaction or for purposes as may be required under the laws. We protect the personal information provided to us in accordance with the Privacy Rules.

In special circumstances – for example, if we were to sell our business or part of our business – your information may be transferred to potential purchasers and their advisers as part of that sale. From time to time, we may provide aggregated and de-identified information to other business partners for various purposes.

Accessing and correcting your information and questions

You can request access to your information or that your information be corrected by contacting us at the address below.

If you have a question about this Policy or wish to make a complaint about the way we have collected, used, held or disclosed your personal information, please contact us at the address below. We may need to contact you for further details.

If you wish to make a formal complaint, please make your complaint in writing to our Grievance Officer at the below mentioned address. We will consider your complaint promptly and contact you to seek to resolve the matter.

Deletion of your personal information

If you require your personal information to be deleted, please contact the Grievance Officer at the below mentioned address. Do note that in the case of deletion of any personal information which is stored by us for the purpose of providing services to you, the said service may get impacted and we may not be able to render the said services.

Changes to the Privacy Policy

Our business changes constantly and this Policy will change also. We may e-mail periodic reminders of our notices and conditions, unless you have instructed us not to, but you should check our website frequently to see recent changes.

Unless stated otherwise, our current Policy applies to all information that we have about you and your account including but not limited to personal information. We stand behind the

promises we make, however, and will never materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers.

Contact

Anko Grievance Officer 690 Springvale Road, Mulgrave VIC 3170 AUSTRALIA Email: privacy@kmart.com.a u Phone: (+61) 1800 124125

RELATED RESOURCES, TOOLS AND LINKS			
SECURITY CLASSIFICATION	Medium – Low Business (MBLI)		
POLICY OWNER	People and Capability		
VERSION	2	IMPLEMENTATION DATE	1 May 2018
LAST AMENDED	11-Dec-2022	PROPOSED REVIEW DATE	1-Jul-2024
APPROVED BY	Head of People & Capability		