



## PRIVACY POLICY

### Purpose

Farm Pride is committed to protecting the privacy of the personally identifiable information that it collects from individuals. This policy sets out guidelines to assist Farm Pride and its employees to comply with the requirements of the *Privacy Act 1998 (Cth)* (“**Privacy Act**”) and the Australian Privacy Principles (“**APPs**”) in relation to the collection, storage, use and disclosure of records containing personal information.

### Scope

This policy applies to the collection, storage, use and disclosure by Farm Pride (or a person acting on behalf of Farm Pride) of records containing an individual’s Personal Information in Australia.

This policy does not apply to an Employee Record or information related to Farm Pride’s employment relationship with the employee.

### Definitions:

**Employee Record** means a record of Personal Information relating to the employment of a Farm Pride employee.

**Farm Pride** means Farm Pride Foods Limited and any related body corporate as that term is defined in the *Corporations Act 2000 (Cth)*.

**Personal Information** includes information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

**Sensitive information** includes health information, genetic information or personal information about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices or criminal record.

### Responsibilities

#### 1. Open and Transparent Management of Personal Information

The purpose of this Policy is to provide information about the management of Personal Information by Farm Pride in an open and transparent manner. Farm Pride will make this Policy available to anyone who asks for it. It is also displayed on our website and other prominent locations.

Farm Pride may review this Policy from time to time. Accordingly, we recommend you review this Policy for changes at regular intervals.

#### 2. Anonymity and Pseudonymity

Where it is lawful and practicable, individuals will have the option of not identifying themselves or using a pseudonym when entering into transactions with Farm Pride, although there are few circumstances in which anonymity would be appropriate.

### **3. Collection of Solicited Personal Information**

#### *How does Farm Pride collect Personal Information?*

When individuals use the Farm Pride website and/or when individuals transact with Farm Pride online or otherwise, individuals may provide Farm Pride with Personal Information. Individuals are not required to provide us with Personal Information however, in some cases if Personal Information is not provided, Farm Pride may not be able to provide you with our products and services or respond to your enquiry. If an individual provides Personal Information, then the individual agrees to the Personal Information being collected, held, used and disclosed in accordance with this Policy.

Farm Pride may collect Personal Information in various ways, including via telephone, our website, our online programs, hard copy forms or email. Where possible, Farm Pride will collect this information directly from the individual. There may be limited occasions when Farm Pride collects Personal Information from someone else. This may include collection from anyone you have authorised to deal with Farm Pride on your behalf, agents or related entities in which case, Farm Pride will take reasonable steps to contact you if it is unclear whether you have consented to the disclosure of the information.

#### *What information does Farm Pride collect?*

Personal information must not be collected unless the information is necessary for one or more of Farm Pride's functions or activities. Personal Information will only be collected by lawful and fair means, unless it is unreasonable or impracticable to do so.

The types of information Farm Pride collects includes information necessary for Farm Pride to provide individuals with products and services or to respond to queries the individual has requested.

Farm Pride generally collects and holds Personal Information including an individual's name, address, date of birth, contact details (such as phone number, fax number and/or email address), credit/debit information, employer name, licences (as required under any health and safety legislation).

Farm Pride will only collect Sensitive Information where an individual has provided consent to do so. In particular, Farm Pride will not collect Sensitive Information about an individual unless:

- a) The individual has consented; and
- b) The information is reasonably necessary for one or more of Farm Pride's functions or activities; and
- c) The collection is required by law; or
- d) The collection is necessary for a permitted general situation or a permitted health situation as prescribed by the Privacy Act.

### **4. Dealing with Unsolicited Personal Information**

Where Farm Pride receives unsolicited Personal Information, Farm Pride will determine whether the information may have been obtained if the Personal Information had been solicited. Where Farm Pride could not have otherwise solicited the information and the information is not contained in a Commonwealth record, Farm Pride will take reasonable steps to destroy or de-identify Personal Information.

## 5. Notification of the Collection of Personal Information

At or before the time, or as soon as practicable thereafter, Farm Pride collects Personal Information, it will notify the individual in accordance with the APPs taking such steps as are reasonable in the circumstances.

## 6. Use and Disclosure of Personal Information

Farm Pride may use your information for the purpose for which it was provided, any related purpose (the secondary purpose) in accordance with the below and as permitted by law. Farm Pride collects Personal Information for purposes including:

- Provision of its goods and services;
- Responding to enquiries;
- Maintaining/administering accounts and processing authorised payments;
- Health and safety, for example, contractor engagements;
- For market research;
- To participate in competitions or other marketing initiatives;
- Quality assurance and training purposes;
- Any other purposes identified at the time of collecting the information.

Farm Pride will not use or disclose Personal Information about an individual for a purpose (the secondary purpose) other than the primary purpose of collection unless:

- a) both of the following apply:
  - the secondary purpose is related to the primary purpose of collection and, if the personal information is Sensitive Information, directly related to the primary purpose of collection; and
  - the individual would reasonably expect the Company to use or disclose the information for the secondary purpose;
- b) The individual has consented to the use or disclosure;
- c) The use or disclosure is necessary for a permitted general situation or a permitted health situation as prescribed by the Privacy Act.
- d) Farm Pride has reason to suspect that unlawful activity has been, is being or may be engaged in, and uses or discloses the Personal Information as a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities;
- e) The use or disclosure is required or authorised by or under law;
- f) The use or disclosure is not inconsistent with the requirements of the Privacy Act.

Farm Pride may disclose Personal Information to others in order to carry out its activities and functions including disclosure to:

- a) External IT providers and other third party service providers (i.e. lawyers, other professionals);
- b) Contractors and service providers who perform services on behalf of Farm Pride;
- c) Government bodies, regulators, authorities or any other party where required by law;
- d) Related body corporate of Farm Pride where in compliance with the APPs.

Farm Pride will only use and disclose your Sensitive Information for the purposes for which it was initially collected, other directly related purposes or purposes to which you otherwise consent.

## **7. Direct Marketing**

Farm Pride will only use Personal Information about an individual for the purpose of direct marketing in permitted circumstances set out in the APPs. An individual may request not to receive direct marketing communications in accordance with the APPs. Where an individual does not elect to opt out of receiving marketing and promotional information then Farm Pride will assume an individual has implied consent to receive information and communications in the future.

If an individual does not wish to receive direct marketing communications from us, please contact Farm Pride on the contact details provided in this Policy.

## **8. Cross Border Disclosure of Personal Information**

Farm Pride will transfer Personal Information about an individual to someone who is in a foreign country only if:

- a) Farm Pride reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principals for fair handling of the information that are substantially similar to the APPs; or
- b) The individual consents to the transfer; or
- c) Farm Pride has taken reasonable steps prior to the transfer of the Personal Information to ensure that the information that it has transferred will not be held, used or disclosed by the recipient of the information inconsistently with the APPs;
- d) The disclosure is necessary for a permitted general situation as prescribed by the Privacy Act.
- e) The disclosure of the information is required or authorised by or under an Australian law.

## **9. Adoption, Use or Disclosure of Government Related Identifiers**

Farm Pride will not adopt a government related identifier as its own identifier except as permitted or required by law.

Farm Pride will not use or disclose a government related identifier of an individual unless the use or disclosure is reasonably necessary for Farm Pride to verify the identity of the individual for the purposes of Farm Pride's activities or functions or as permitted by law or in circumstances of a permitted general situation as prescribed by the Privacy Act.

An identifier may include a number or reference that has been assigned by a third party i.e. TFN.

## **10. Quality of Personal Information**

Farm Pride will take reasonable steps to make sure that the Personal Information it collects, uses or discloses is accurate, complete and up-to-date. However, Farm Pride relies on individuals to advise of any changes to their information or corrections to the information it holds.

Please let us know as soon as possible if there are any changes to your information or if you believe the information we hold about you is not accurate, complete or up-to-date.

## **11. Security of Personal Information**

Farm Pride will take reasonable steps to protect the Personal Information it holds from misuse, interference and loss and from unauthorised access, modification or disclosure other than in accordance with this Policy.

Farm Pride will take reasonable steps to destroy or permanently de-identify Personal Information if it is no longer needed for any purpose and it is not required by law to be retained.

However, no data protection and security measures are completely secure. Despite all the measures Farm Pride has put in place, we cannot guarantee the security of information particularly in relation to transmissions over the internet. Accordingly, any information transmitted to Farm Pride is transmitted at an individual's own risk. Individuals must take care to ensure protect of their information (i.e. by protecting usernames and passwords etc) and notify Farm Pride as soon as possible after an individual becomes aware of any potential or actual security breaches.

## **12. Access to Personal Information**

If Farm Pride holds Personal Information about an individual, it will provide the individual with access to the information on request by the individual, except where this impinges on the rights owed to a body or individual or where Farm Pride considers that there are other reasonable grounds not to provide access in accordance with the APPs. Where Farm Pride declines a request to provide such information, it will provide the reasons for this to the individual unless it would be unreasonable to do so. An individual may lodge a complaint in respect of any refusal in accordance with this Policy.

Upon request from an individual, Farm Pride will give access to the information in the manner requested by the individual if it is reasonable and practicable to do so within a reasonable period after the request is made.

Farm Pride may impose a reasonable charge for the provision of access to the Personal Information although no charge will apply to the making of the request.

## **13. Correction of Personal Information**

Where Farm Pride holds Personal Information and it is satisfied that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading or the individual requests Farm Pride to correct the information, then Farm Pride will take reasonable steps to correct that information.

Where Farm Pride declines a request to correct such information, it will provide the reasons for this to the individual unless it would be unreasonable to do so. An individual may lodge a complaint in respect of any refusal in accordance with this Policy.

## **14. Complaint Handling**

If you wish to make a complaint about a suspected breach of this Privacy Policy or the APPs under the Privacy Act, you can contact Farm Pride on the below details. You will need to provide us with sufficient details regarding your complaint, as well as, any supporting evidence and/or information.

Farm Pride will investigate your complaint and will notify you in writing of the determination. If you are not satisfied with Farm Pride's determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner.

**Bruce De Lacy**  
Company Secretary

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