



PRIVACY POLICY

Purpose

The objective of this Policy is to outline the privacy obligations and guidelines relating to the use and access of personal and sensitive information by Farm Pride Foods Ltd (Farm Pride).

Scope

This policy document is intended to enable all people who interact with Farm Pride to understand what types of personal information we collect, and what we do with such information in performing our functions and in light of our privacy obligations.

Farm Pride:

- is committed to protecting the privacy of the personal information we collect and receive. This Privacy Policy seeks to explain how Farm Pride collects, uses, discloses and otherwise handles personal information. It also seeks to explain how individuals can access and correct the personal information we hold or complain about any suspected privacy breach;
- recognises that privacy is important and that individuals have a right to access their personal information held by Farm Pride;
- is committed to complying with the Australian Privacy Principles set out in the Privacy Act 2020(Cth) (Privacy Act) (and state and territory equivalents);
- This policy is created in accordance with the Australian Privacy Principles and is binding on Farm Pride and its related bodies corporate.

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 2001* (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.

1. Collection of Solicited Personal Information

How does Farm Pride collect Personal Information?

Farm Pride will not collect personal information unless the information is reasonably necessary. Farm Pride will only collect personal information by lawful and fair means and not in an unreasonably intrusive way.

Farm Pride may directly collect personal information through various means, including but not limited to the following:

- a. as a result of participating in a Farm Pride Foods competition;
- b. when an individual contacts, or is contacted by, Farm Pride by any medium (including but not limited to electronic, tangible and personal means);
- c. where an individual provides details to Farm Pride in an application, consent form, survey, feedback form, incident report or any other form of document;
- d. where an individual engages with Farm Pride via social media;
- e. where provided or made available by third parties (including but not limited to recruiters, timing recorders, government entities, event managers, promoters and organisers);
- f. from Farm Pride's related entities, contractors, agents and employees;
- g. from family members and other people involved in Farm Pride affiliated events;
- h. searches for information which is publicly available;
- i. when an individual applies for employment with Farm Pride;
- j. from the use of any of Farm Pride's services (including its web based services and services provided by others on behalf of Farm Pride); and
- k. where Farm Pride is required to do so by law (for education, VET training, child protection, work health and safety laws, charitable collections, medical treatment or other legislation in Australia).

What information does Farm Pride collect?

Generally, personal information is information or an opinion (including information or an opinion forming part of a database) from which it is possible to determine someone's identity.

The information collected by Farm Pride about a particular individual will vary depending on the circumstances of collection. It may include, but is not limited to, an individual's contact details (name, email and/or postal address, phone number), date of birth, gender, credit card details, driver license number, passport number, insurance details, employment history, qualifications or communication history with Farm Pride.

Sensitive Information

Sensitive information is a type of personal information that also includes information or an opinion about:

- racial or ethnic origin;
- political opinion;
- membership of a political association, professional or trade association or trade union;
- religious beliefs or affiliations or philosophical belief;
- sexual preferences or practices;
- criminal record; or
- health, genetic information or disability.

If it is reasonably necessary in the circumstances, Farm Pride may also collect sensitive information such as an individual's medical history, nationality, their ethnic background or disabilities.

Farm Pride is required by law to obtain consent when collecting sensitive information. Farm Pride will assume consent to the collection of all sensitive information that is provided to it for use in accordance with this Privacy Policy, unless told otherwise.

Providing information

Depending on the circumstances, some types of information will be required and others might be optional. If an individual does not provide some or all of the information requested, this may affect Farm Pride's ability to communicate with that individual or provide the requested products or services.

By not providing requested information, an individual's ability to participate in programs or competitions or apply for employment or volunteer positions with Farm Pride may be jeopardised. If it is impracticable for Farm Pride to deal with an individual as a result of them not providing the requested information or consents, Farm Pride may refuse to do so.

Information storage and protection

Farm Pride stores information in different ways, including in paper and electronic form. When an individual's information is entered into this database, the information may be combined or linked with other information held about you.

Farm Pride has taken steps to protect the information we hold from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures Farm Pride uses includes strict confidentiality requirements of employees, volunteers and service providers, as well as security measures for system access, and security measures for Farm Pride's website such as firewalls and system encryption.

Farm Pride seeks to protect all personal information from any unauthorised loss, disclosure or access. However, if a serious data breach occurs, Farm Pride must notify the affected individual as required under the Privacy Act regarding the circumstances of the breach and must also advise the Office of the Australian Information Commissioner.

Use of Personal Information

The primary purpose for which Farm Pride collects information is to enable it to perform its activities and functions and to provide the best possible quality of service.

To this extent, Farm Pride collects, holds, uses and discloses personal information for purposes which may include but are not limited to the following:

- (a) to provide products and services;
- (b) to provide news, information or advice about Farm Pride's products;
- (c) to communicate with an individual including by email, mail or telephone;
- (d) to manage and enhance Farm Pride's products and services;
- (e) to conduct competitions or promotions on behalf of Farm Pride and selected third parties;
- (f) to verify an individual's identity and complete background checks;
- (g) to conduct business processing functions for operation of our websites or our business;
- (h) for Farm Pride's administrative (including billing), marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of Farm Pride's contractors or external service providers;
- (i) to respond to emergency situations involving or requiring medical treatment;
- (j) to investigate any complaints about or made by an individual, or if Farm Pride has reason to suspect that an individual is in breach of any of Farm Pride terms and conditions or that they are or have been otherwise engaged in any unlawful activity; and
- (k) as required or permitted by any law (including the *Privacy Act*).

Disclosure of Personal Information

In order to achieve these purposes, Farm Pride may disclose personal information to third parties as permitted by law. Such third parties may include but not be limited to the following:

- Farm Pride's service providers, agents, employees and contractors;
- Farm Pride's advisors, committees, commissions, auditors, insurers, sponsors and re-insurers;
- persons involved or interested in Farm Pride's affiliated activities and or;
- government and law enforcement agencies and regulators;
- investigators and assessors.

Farm Pride may also disclose personal information:

- (i) with an individual's express or implied consent;
- (ii) when required or authorised by law;
- (iii) to an enforcement body when reasonably necessary; or
- (iv) to lessen or prevent a threat to an individual or public health or safety.

Non-Disclosure of Information

Individuals can always decide to not provide some or any personal information requested by Farm Pride. If a request to provide any personal information is declined Farm Pride may:

- (a) not be able to provide the product or service an individual has requested (such as memberships, licenses or permits);
- (b) deny access in part or in full to the products and services Farm Pride provides (such as access to electronic and web based systems);
- (c) cancel a membership, permit or license or prevent an individual from participating in a Farm Pride affiliated event; and
- (d) not be able to provide information about products and services that an individual may want, including information about discounts sales or special promotions.

Data-Security

Farm Pride will take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure. Farm Pride will also take reasonable steps to destroy or permanently de-identify personal information that it no longer requires.

If an individual suspects any misuse or loss of, or unauthorised access to, their personal information, they should immediately notify Farm Pride.

Marketing

- (a) Farm Pride may send marketing communications and information about its activities, products and services that it considers may be of interest. These communications may be sent in various forms, including mail, SMS or email, in accordance with applicable laws. If an individual indicates a preference for a method of communication, Farm Pride Foods will endeavour to use that method whenever practical to do so.
- (b) Farm Pride will endeavour to provide an option to opt out of receiving further marketing and promotional materials from Farm Pride Foods where personal information is disclosed. In addition, an individual may contact Farm Pride Foods at any time to request that any further promotional or marketing information is not sent directly to that individual.
- (c) Farm Pride Foods should immediately be contacted in the event that an individual receives a communication from Farm Pride Foods that is sent other than in accordance with this policy, or in breach of any law.

Farm Pride's website

- (a) When users visit the Farm Pride website, our systems may record certain information about their use of the site, including the web pages visited and the time and date of their visit. Farm Pride uses this information to help analyse and improve the performance of our website.
- (b) Farm Pride may use "cookies" on our website. Cookies are small text files that help a website to remember the preferences of users to improve the experience of using that website. In some cases, the cookies that we use may collect some personal information. Farm Pride will treat this information in the same way as other personal information it collects. An individual is free to disable cookies on their internet browser to prevent this information being collected.

- (c) Websites linked to the Farm Pride website are not subject to our privacy standards, policies or procedures. Farm Pride cannot take any responsibility for the collection, use, disclosure or security of any personal information provided to a third party website.

Access and Correction

- (a) An individual may request access to any personal information held by Farm Pride about them at any time by contacting Farm Pride (details below). Where Farm Pride holds information that an individual is entitled to access, we will try to provide suitable means of accessing it (for example, by mail or email). Farm Pride will respond to a request for access within 14 days and endeavour to provide the requested information within 30 days.
- (b) Farm Pride will not charge for simply making a request and will not charge for making any corrections to personal information or for any reasonable costs incurred in delivering that information to an individual in Australia. Farm Pride may charge an individual for compiling, copying and providing information they have requested where we consider that the time and cost involved is unreasonable or excessive.
- (c) If a request for access is made, Farm Pride may ask for verification of identity. There may be instances where we cannot grant an individual access to the personal information held by us and we will provide written reasons for not giving that information
- (d) If an individual believes that personal information held by Farm Pride about them is incorrect, incomplete or inaccurate, then Farm Pride may be asked to amend it. Farm Pride will consider if the information requires amendment and if we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that the individual disagrees with it.
- (e) Farm Pride requests that individuals keep their information as current as possible so that we can continue to improve our service.

Complaints, Further Information and Future Changes

Any complaints in relation to the collection, use, disclosure, quality, security and access of personal information or a breach of this policy, the *Privacy Act* or the *Australian Privacy Principles* by Farm Pride may be made to , who may be contacted as follows:

Farm Pride Foods Ltd
PO Box 141
Noble Park VIC 3174
Phone: 03 9798 9207
Email: CompanySecretary@farmpride.com.au

- (b) Farm Pride will respond to a complaint within 30 days and try to resolve it within 90 days. If we are unable to resolve a complaint within this time, or an individual is unhappy with the outcome, they can contact the Office of the Australian Information Commissioner via its enquiries line 1300 363 992 or website <http://www.oaic.gov.au/> to lodge a complaint.
- (c) Farm Pride may amend this Policy from time to time.

Implications for Non-Adherence

Any breach of this Policy by may result in disciplinary action being taken by Farm Pride against any individual responsible for such breach. Disciplinary action may include but not be limited to suspension of duties or obligations or termination of employment or other arrangements with Farm Pride.

Farm Pride Foods Ltd

Phone: 03 9798 9207

Email: CompanySecretary@farmpride.com.au