

Bundaberg Sugar Group Ltd

Privacy Policy

Release Date: [insert]

Version: 1

Privacy Policy

Bundaberg Sugar Group Ltd (ACN 009 658 164) and its related bodies corporate (collectively the ‘**Bundaberg Sugar Group**’) understand the importance of privacy issues and are committed to ensuring your privacy is protected. The entities comprising the Bundaberg Sugar Group are set out at section 17 below.

1. Background

This Privacy Policy identifies how we manage the “personal information” we collect, use, hold and disclose and how to contact us if you have any queries.

We are bound by the *Privacy Act 1988 (Cth)* (**Act**) which includes the Australian Privacy Principles (**APPs**). This Privacy Policy should be read in conjunction with the Privacy Act and the APPs. You can obtain a copy of the APPs from the Australian Information Commissioner’s website (<http://www.oaic.gov.au/>).

In this Privacy Policy, the expressions “we”, “us” and “our” are references to Bundaberg Sugar Group Ltd and any related bodies corporate.

This Privacy Policy does **not** apply to the Bundaberg Sugar Group’s **employee records**. The Bundaberg Sugar Group has, and will continue, to maintain appropriate levels of confidentiality to employee records.

2. What is personal information?

‘Personal information’ is information or an opinion, in any form, whether true or not, about an individual whose identity is apparent or can be reasonably inferred from the information provided. The type of personal information held by the Bundaberg Sugar Group will depend on how you interact with us and may include:

- your name;
- your contact details (including your address, email address and phone number);
- your gender;
- your employment details;
- your educational qualifications;
- your banking information;
- your credit card information; and
- your payment history.

Some personal information is considered sensitive information and includes:

- your political opinions;
- your race or ethnic origin;
- your growers membership association details;
- any disabilities, illnesses or injuries you may have; and/or
- any other health information.

We will only collect sensitive information with your consent and where the collection is reasonably necessary for us to pursue one or more of our functions or activities set out in **section 5** below or to comply with the law.

3. How does Bundaberg Sugar Group collect personal information?

This Privacy Policy applies to personal information that the Bundaberg Sugar Group collects from you:

- via telephone;
- via email;
- via fax;
- via recruitment agencies;
- via labour hire companies;
- via contractors;
- via one of our websites;
- in person; and/or
- in writing.

In this context, “collect” means gather, acquire or obtain by any means, information in circumstances where the individual is identifiable or identified.

Where possible, we collect your personal information directly from you or your authorised representative. If we receive your personal information from another party, we will contact you (if we have sufficient information to do so and it is reasonable in the circumstances). Some exceptions to us advising you are where:

- you have provided consent or reasonably expect the collection to occur;
- the collection is required or authorised by or under law; or
- the collection is for the purpose of litigation or legal advice.

4. Will I be notified if the Bundaberg Sugar Group collects my personal information?

Where we have collected personal information about you either directly or by other means as set out above, we will notify you of the following at the time, or as soon as practicable, to ensure that you are aware of such collection and its purpose:

- the main reason that we are collecting personal information (this reason will be the **Primary Purpose**);
- other related uses or disclosures that we may make of the personal information (**Secondary Purpose**);
- Our identity and how you can contact us, if this is not obvious;
- That you can access the personal information that we hold about you;
- That you should contact us should you need to access or correct personal information collected by us or have any concerns in relation to personal information;

- The organisations to whom we usually disclose the personal information; and
- Where applicable, any law that requires the personal information to be collected.

If we receive unsolicited personal information about or relating to you and we determine that such information could have been collected in the same manner if we had solicited the information, then we will treat it in the same way as solicited personal information and in accordance with the Act. Otherwise if we determine that such information could not have been collected in the same manner as solicited personal information, we will, if it is lawful and reasonable to do so, destroy the information or de-identify the information.

5. How will my personal information be used?

We use personal information for the Primary Purpose for which it is collected. You will ordinarily be given information about the Primary Purpose of collection, at the time the information is collected.

We will collect personal information for the following Primary Purposes:

- The processing and sale of sugar related products and by-products of sugar milling and refining including:
 - industrial products (for example, commercial liquid invert sugars);
 - retail products (for example, brown, caster sugar);
 - raw sugar products;
 - by products (for example, molasses);
- The processing and sale of agricultural products such as liquid feeds;
- The farming, harvesting and sale of crops including sugar cane, macadamias and other crops (for example ginger, soy and peanuts);
- The supply of general engineering services including technical services, specialised castings, manufacturing, design and drafting, project management and site services including plant and equipment erection; and
- The supply of sugar industry machinery to assist in sugar cane handling and preparation, sugar cane milling, process equipment, gear boxes, steam turbines for mills and shredders and cane and bagasse diffusers.

Other purposes connected to the Primary Purpose for which personal information is used is to enable the Bundaberg Sugar Group to:

- Perform its obligations under cane supply agreements with growers, including enabling Bundaberg Sugar Group to meet its payment obligations;
- Update growers on the current pricing of sugar cane;
- Provide affiliated grower associations with the grower's details (where the grower has consented and on the grower's behalf);
- Provide third parties with grower's details (where the grower has consented by deduction authority);
- Perform farming and harvesting services and farming lease agreements; and
- Manage customer relations, orders and issues.

6. How will my personal information be disclosed?

We may disclose personal information to our related entities and to third party providers. Except as permitted by the APPs, we will only disclose your personal information for the purposes as set out in this Privacy Policy.

We may disclose personal information that we collect:

- To our related entities, contractors or agents;
- To others that you have been informed of at the time any personal information is collected from you;
- To our business associates and others for purposes directly related to the purpose for which the personal information was collected (including organisations involved in the sale and supply of sugar cane, other crops, sugar and agricultural related products and machinery);
- To our professional advisors;
- To organisations that acquire all or part of our assets or business;
- To government and regulatory authorities; and
- To provide brokers and agents with relevant details.

We will take reasonable steps to ensure that any third party providers comply with the APPs, or are subject to a law or scheme that is at least substantially similar to the way in which the APP's protect personal information.

7. Where is my personal information stored?

Where we store your personal information depends largely on the purpose for which it was collected. This may include (but is not limited to):

- Our internal customer relationship management system which is hosted in Australia;
- Our internal electronic database;
- Our hard copy records in our office; and
- Our hard copy and/or electronic records in secure archiving storage facilities.

8. How is my personal information stored and secured?

We will take reasonable steps to protect your personal information from unauthorised access, loss, disclosure or modification in accordance with this Privacy Policy.

We may store your personal information electronically or in hard copy or both.

We regularly monitor all our systems holding personal information. We will take reasonable steps to maintain the security of and to prevent unauthorised access to or disclosure of your personal information. However, we do not guarantee that unauthorised access to your personal information will not occur, either during transmission of that information to us or after we receive that information.

We take all reasonable steps to ensure that paper and electronic records containing personal information are stored in facilities that are only accessible by people who have a genuine need to know.

We only retain your personal information for as long as is necessary for the purposes for which it was collected and we are required to keep it to comply with any laws. We will take such steps as are reasonable in the circumstances to destroy or de-identify personal information which we no longer need. These measures may vary depending on the personal information held.

The provision of personal information by you is at your own risk. On our receipt of your personal information we will take reasonable steps to preserve the security of your personal information on our systems.

9. Will my personal information be transferred overseas?

Your personal information will only be held in Australia, as we do not use information systems hosted by third parties that store personal information offshore.

10. Is my personal information used for direct marketing purposes?

We do not use your personal information for the purposes of direct marketing which may include providing you with information about events, products or services that may be of interest to you.

11. If I apply for a job with the Bundaberg Sugar Group how will my personal information be afforded the same protection under the Act?

Where you provide information to the Bundaberg Sugar Group in relation to a job application the personal information you will provide will only be collected, held, used and disclosed for the purpose of considering your potential employment with any of the entities within the Bundaberg Sugar Group.

Where you provide the details of referees, you confirm that you have informed the referees that you are providing their contact information to us and that they have consented to us contacting them and discussing the personal information you have provided in relation to the job application.

Contracted Service Providers

There may also be instances in which we receive your personal information from our contracted service providers (for example, recruitment agencies or labour hire companies), who have collected your personal information on our behalf.

We take reasonable steps to implement contractual measures to ensure that contracted service providers (including sub-contractors) do not breach the APPs.

12. Use of our website

When you browse our website, our Internet Service Provider (**ISP**) may collect information using 'cookies'. 'Cookies' assist us to store information on how visitors to our website use it and the pages

that may be of most interest. Further, this information may be used for the purposes of usage analysis, capacity planning and patterns to further improve our site. Access to this information is restricted within the Bundaberg Sugar Group and any consultants who are bound to respect the privacy of the information.

We do not disclose or publish information which identifies browser activity without consent. We reserve the right to gather information about any attempted access to any of the Bundaberg Sugar Group's websites which raises security issues and may make required disclosures to relevant authorities.

13. How do I seek to access and/or correct my personal information?

We review, on a regular and ongoing basis, our collection and storage practices to ascertain how improvements to accuracy can be achieved.

You can request access to your personal information held by us. We may ask that you put the request in writing and may also require some verified proof of identification before releasing or correcting any personal information.

We take the accuracy of your personal information seriously, if you are aware that the information we hold relating to you is inaccurate, incorrect or out-of-date, please contact our Privacy Officer.

We may charge you a reasonable fee for searching for and providing access to your personal information. However, we will not charge you for the making of the request or to update your personal information.

14. How do I complain about a breach of the Act?

Maintaining the privacy of your personal information is of paramount importance to us as it helps us foster confidence, goodwill and stronger relationships with you, our growers and customers. If at any time, you have a complaint about the way in which we have dealt with your personal information or a privacy problem or query, please contact our Privacy Officer at:

Privacy Officer
Bundaberg Sugar Ltd
PO Box 500
Bundaberg QLD 4670
Telephone: (07) 4150 8976
Fax: (07) 4150 8511
Email: privacy@bundysugar.com.au

15. Our approach to your complaint

We will acknowledge your request within 10 Business Days of our receipt. If you do not receive a satisfactory response from us within 10 Business Days, you may refer your query, problem or complaint to the Office of the Australian Information Commissioner via the contact details listed at <http://www.oaic.gov.au/about-us/contact-us-page>.

16. Review of Privacy Policy

From time to time, we may amend this Privacy Policy if our business activities or the law changes without notice. We will post any changes to this Privacy Policy on our websites <http://www.bundysugar.com.au/>, <http://www.bundabergwalkers.com.au> and <http://www.bundabergmolasses.com.au> under 'Privacy' tab. Any changes will not be retroactively applied and will not alter how we handle previously collected personal information.

We note this version of the Privacy Policy was last updated on 10 June 2014.

We would welcome any comments you may have on this Privacy Policy and its effectiveness. If you would like to make any comments, please do not hesitate to contact our Privacy Officer (see contact details in **section 14** above).

If you would like any further information about your rights to privacy, please see the Australian Information Commissioner's website - (<http://www.oaic.gov.au/>)

17. What entities comprise the Bundaberg Sugar Group?

This Privacy Policy applies to all members of the Bundaberg Sugar Group which comprises the following entities:

- Finasucre Investments (Australia) Pty Limited;
- Bundaberg Sugar Group Ltd;
- Bundaberg Sugar Ltd; and
- Bundaberg Walkers Engineering Ltd.

Facebook is a registered trade mark of Facebook Inc. LinkedIn is a registered trade mark of LinkedIn Corporation. Twitter is registered trade mark of Twitter Inc.
--