

SW Dairy Limited - Privacy Statement and Privacy Policy

Privacy Statement

SW Dairy Limited ACN 621 473 587 (**SWDL**) collects your personal information in order to provide you with its services, respond to your enquiries and otherwise do business with you. If you do not provide the information requested, SWDL may not be able to provide you with the requested service or accurately respond to your enquiry. SWDL may disclose the personal information it collects to SWDL's related entities, advisors and third parties who provide it with (or help it provide) services, including to recipients based in overseas locations such as the USA. SWDL's privacy policy is available at www.swdl.com.au states how you can seek to access or correct any personal information we hold about you, how to complain about a privacy breach and how we will deal with a privacy complaint. We can be contacted at: admin@swdl.com.au.

Privacy Policy

The last update to this document was 8 December 2020.

Introduction

SW Dairy Limited ACN 621 473 587 (**SWDL, we, us, our**) is committed to complying with applicable privacy laws in relation to the personal information that we collect in the course of running our business. Where applicable privacy laws provide for exceptions or exemptions, we may rely on those exceptions or exemptions in our information handling practices.

Please take a moment to read our Privacy Policy as it explains how we manage personal information including our obligations and your rights in respect of our dealings with your personal information.

This Privacy Policy (other than section 10) explains how we manage personal information about individuals other than employees. Section 10 explains the position of employees.

Key definitions

In this document:

- "**APPs**" means the Australia Privacy Principles set out in the Privacy Act;
- "**personal information**" has the meaning set out in the Privacy Act, and (in summary) means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or otherwise;
- "**Privacy Act**" means the *Privacy Act 1988* (Cth); and
- "**sensitive information**" has the meaning set out in the Privacy Act, and includes certain specific types of personal information such as health information, and information about a person's racial or ethnic origin, sexual orientation or practices, criminal record, religious beliefs or affiliations, political opinions, membership of a political, professional or trade association, and biometric and genetic information.

1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- when you make an enquiry in relation to our services, including through our website located at www.swdl.com.au (the **Website**);
- in administering and performing any contracts with customers and service providers;
- when you contact us via telephone or other means;
- from correspondence (whether in writing or electronically);
- when you upload content to or interact (in an identifiable manner) with our Website or our social media pages;
- if you attend any of our premises, we may record certain contact details so that we can comply with applicable laws, and we may also record your image and/or voice if we have surveillance systems operating at those premises;
- when administering any of our services; and
- as otherwise required to manage our business.

However, in certain cases we may collect personal information from publically available sources and third parties, such as suppliers, recruitment agencies, your employer, contractors, our customers and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

2. Types of personal information we collect

The types of personal information we collect about you depends on the circumstances in which the information is collected. Typically, the types of personal information we may collect can include (but is not limited to) your name, address, email address and phone numbers.

If we enter into contracts with you, request or receive services from us or have any other commercial dealings with us, we may also collect your milk production, insurance, banking details and billing information.

If you are an individual contractor to us, we may also collect information relevant to your engagement with us including qualifications, length of engagement, resume, current and former employment details, pay rate and salary, bank details, feedback from supervisors, training records and logs of your usage of our equipment (e.g. phones, computers and vehicles).

If you attend premises we operate or manage, we may:

- collect certain contact details that you provide to us (which may be via digital check-in apps), including the date and time of attendance, including so that we can comply with applicable laws (such as public health directives). If we collect such information to comply with a particular law, we will only use and disclose it in accordance with applicable laws; and
- record your image and/or voice through the use of Closed-Circuit Television (CCTV) systems footage of you via our CCTV devices, for the purposes of managing security of the premises and health and safety of occupants and the public generally.

If you access our Website, we may utilise cookies to collect additional information about your use of our Website. Please see the cookies section below for further details.

We only collect sensitive information about you with your consent, or otherwise in accordance with the Privacy Act. The main types of sensitive information we may collect include:

- details of injuries (i.e. health information) that may occur on our premises; and

- details of disabilities or allergies (i.e. health information) you elect to provide to us so we can accommodate any special requirements when you attend our premises.

If you do provide sensitive information to us for any reason, you consent to us collecting that information and to us using and disclosing that information for the purpose for which you disclosed it to us and as permitted by the Privacy Act and other relevant laws.

In addition to the types of personal information identified above, we may collect personal information as otherwise permitted or required by law.

3. Our purposes for handling your personal information

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances. The purposes for which we use and disclose your personal information will depend on the circumstances in which we collect it. Whenever practical we endeavour to inform you why we are collecting your personal information, how we intend to use that information and to whom we intend to disclose it at the time we collect your personal information.

We may use or disclose your personal information:

- for the purposes for which we collected it (and related purposes which would be reasonably expected by you);
- for other purposes to which you have consented; and
- as otherwise authorised or required by law.

In general we collect, use and disclose your personal information so that we can do business together and for purposes connected with our business operations.

Some of the specific purposes for which we collect, hold, use and disclose personal information are as follows:

- to offer and provide any services to you or to receive goods or services from you;
- to discuss/review your farm insurance/milk production;
- to make or receive payments from you in connection with our services or the goods and services you provide to us;
- to consider you for a job (whether as an employee or contractor) or other relationships with us;
- to comply with our legal and regulatory obligations;
- to protect the security, health and safety of our premises, facilities, personnel and visitors;
- to address any issues or complaints that we or you have regarding our relationship;
- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner;
- operate the website;
- to develop and improve our Website and services; and
- to protect the security and integrity of the website.

4. Who we disclose your personal information to

We may disclose your personal information to third parties in connection with the purposes described in section 3 of this Privacy Policy. This may include disclosing your personal information to the following types of third parties:

- our suppliers, contractors and organisations that provide us with technical and support services;
- our related entities (who may use and disclose the information in the same manner we can);
- our accountants, insurers, lawyers, auditors and other professional advisers;
- any third parties to whom you have directed or permitted us to disclose your personal information; and

- in the unlikely event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors.

We may also disclose your personal information in accordance with any consent you give or where disclosure is authorised, compelled or permitted by law.

If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

5. Protection of personal information

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas. We use a range of security measures to protect the personal information we hold, including by implementing IT security tools to protect our electronic databases.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

6. Direct marketing

Like most businesses, marketing is important to our continued success. We therefore like to stay in touch with customers and let them know about new offers and opportunities. We may provide you with information about products, services and promotions either from us, or from third parties which may be of interest to you, where:

- you have consented to us doing so; or
- it is otherwise permitted by law.

You may opt out at any time if you no longer wish to receive direct marketing messages from us. You can make this request by contacting our Privacy Officer.

7. Cookies

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

We may use third party vendors to show our ads on sites on the Internet and serve these ads based on a user's prior visits to our Website. We may also use analytics data supplied by these vendors to inform and optimise our ad campaigns based on your prior visits to our Website.

8. Accessing and correcting your personal information

You may contact our Privacy Officer (see section 12) to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to the personal information we hold about you.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

9. Overseas transfers of personal information

Some of the third parties to whom we disclose personal information may be located outside Australia. The countries in which such third party recipients are located depend on the circumstances. In the ordinary course of business we may disclose personal information to our service providers located in the United States in connection with the hosting and technical support services they provide for our business and Website.

By providing your personal information to us, you consent to us disclosing your personal information to any such overseas recipients for purposes necessary or useful in the course of operating our business, and agree that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the Australian Privacy Principles, that entity will not be bound by, and you will not be able to seek redress under, the Privacy Act.

10. Employees

We collect information in relation to employees as part of their application and during the course of their employment, either from them or in some cases from third parties such as recruitment agencies. Such information may include contact details, qualifications, resume, current and former employment details, pay rate and salary, bank details, feedback from supervisors, training records and logs of your usage of our equipment (e.g. phones, computers and vehicles).

Under the Privacy Act, personal information about a current or former employee may be held, used or disclosed in any way that is directly connected to the employment relationship. We handle employee information in accordance with legal requirements and our applicable policies in force from time to time.

11. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Privacy Officer (see section 12).

When contacting us please provide as much detail as possible in relation to your question, concern or complaint.

We take all complaints seriously, and will respond to your complaint within a reasonable period. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner
GPO Box 5218, Sydney NSW 2001
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

12. Contact details of Privacy Officer

The contact details for our Privacy Officer are as follows:

Postal address: 12A Curdie Street, Cobden, Vic 3266
Telephone: 0408 528915
Email admin@swdl.com.au

13. Links

Our Website may contain links to other websites operated by third parties. We make no representations or warranties in relation to privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices and procedures.

14. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.