



Privacy Policy and Procedure

GrainCorp Limited
ABN 60 057 186 035

graincorp.com.au

Contents

Contents.....	2
1 Introduction.....	4
2 Objectives	4
3 GrainCorp’s functions and activities.....	5
4 Collecting your Personal Information	5
5 Collection of unsolicited Personal Information	7
6 Collection of information for employment purposes	7
7 How do we manage your Personal Information?	7
8 Accuracy and quality of Personal Information	8
9 Anonymity and Pseudonymity.....	8
10 Direct marketing	9
11 Consent to use or disclose your Personal Information	9
12 Disclosure of personal information within Australia and overseas	9
13 Destruction and de-identification of personal information.....	10
14 Access to and correction of Personal Information and the complaint process.....	10
15 Credit Reporting	11
16 Third party websites.....	13
17 European data protection regulation	13
18 Further information	14
19 Changes to this Policy	15
20 Overseas Disclosure to Related Bodies Corporate – List of GrainCorp Related Corporates	15

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1 Introduction

- 1.1. This Policy describes the handling of Personal Information collected by GrainCorp Limited and its related entities and bodies corporate (“**GrainCorp**” or “**GrainCorp Group**”), except for those related entities and related bodies corporate which have their own privacy policies (available on their website).
- 1.2. GrainCorp recognises the importance of and is committed to the protection of personal privacy. GrainCorp is bound by the Australian Privacy Principles (APPs) as provided for in the *Privacy Act 1988* (Cth). This Policy has been developed as part of GrainCorp’s ongoing commitment to the protection of the privacy of individuals with whom it deals.
- 1.3. The information in this Policy relates to GrainCorp’s current privacy standards. GrainCorp may vary these standards from time to time. Any variation will be reflected in the Policy. GrainCorp encourages individuals to check this Policy from time to time to ensure they are aware of the most up to date privacy standards applying to the handling of their personal information.

2 Objectives

- 2.1. The objectives of this Policy are to:
 - 2.1.1. Establish a set of privacy standards to which GrainCorp will comply to protect the privacy of individuals whose personal information GrainCorp collects, uses, discloses, stores and handles;
 - 2.1.2. Demonstrate GrainCorp’s ongoing commitment to protecting privacy and to address any privacy concerns individuals may have arising from its functions and activities;
 - 2.1.3. Describe the manner and purposes for which GrainCorp collects, uses, discloses, stores and handles personal information;
 - 2.1.4. Describe how an individual may access their personal information and seek correction of that information;
 - 2.1.5. Describe how an individual may complain about a breach of the APPs by GrainCorp;
 - 2.1.6. Ensure that GrainCorp complies with its obligations under the *Privacy Act 1988* (Cth) and *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth).

3 GrainCorp's functions and activities

3.1. The business of GrainCorp is describes in detail in other documents such as the GrainCorp Annual Report. In summary, GrainCorp is involved in the provision of bulk grain storage and handling services and supply of grains/oilseeds, edible oils and fats and other products to customer groups across the spectrum – from growers, to end consumers, in Australia and abroad. GrainCorp operates a grain marketing division which offers a range of marketing and contracting alternatives for grains, cereals, oilseeds and pulses. In conducting its business, GrainCorp carries out a range of activities including managing grain storage, manufacturing food products, building and maintaining its commercial and business relationships with customers, performing administrative functions, promoting its products and services and complying with legal requirements. GrainCorp may also facilitate the buying and/or selling of grain over its website, web based applications or an internet portal.

4 Collecting your Personal Information

- 4.1. GrainCorp collects information from individuals in order to conduct various aspects of business functions and activities.
- 4.2. These individuals include but are not limited to GrainCorp's customer, prospective customer, contractors, suppliers, agents, service providers and employees, depending on the services to be accessed.
- 4.3. The information we collect may include (but is not limited to): your name, address, telephone number/s, email address, date of birth, financial status, National Grower Register (NGR) details, credit history, transaction history, banking details, insurances, employment history, educational qualification or personal references, details of when you visit any of our workplaces (such as your vehicle registration details), and select biometric data such as CCTV footage and on-site security imaging.
- 4.4. We may also collect sensitive information in certain circumstances. Refer to the section "Collection of Information for Employment Purposes" below.
- 4.5. GrainCorp collects personal information from documents such as application or registration forms, supplementary forms, competition forms, letters, e-mails or as derived in meetings, seminars, telephone conversation or written exchanges. GrainCorp may also collect personal information through an individual's use of the GrainCorp Group website/s, application or web based tools. We may also collect your personal information if the law requires us to collect it.
- 4.6. With regard to personal information produced or transmitted by electronic communication (i.e. the internet, electronic devices or web based tools), GrainCorp may collect the following information: website access, use and/or viewing, GPS locations or

handset details if GrainCorp's website or related application are accessed on a mobile device.

- 4.7. Each time you visit our websites we may also automatically collect information and personal data about your computer for system administration including, where available, Internet Protocol (IP) address used to connect your computer to the internet, MAC addresses, traffic data, location data, your login information, time-zone setting browser type and version, browser plug-in types and versions, operating system and platform, weblogs, cookies and other communication data, and the resources that you access. We do this to help us analyse how users use the websites (including behaviour patterns and the tracking of visits across multiple devices), to establish more insights about our website users and to assist us in managing your account and improving your online experience. Please see our cookies policy for further information about what information may be automatically collected when you visit our websites <http://www.graincorp.com.au/cookies-policy>.

- 4.8. Wherever possible GrainCorp collects personal information from the person concerned, but we may obtain information about a person from others. Collection of information via third persons may take the form of details held by:
 - 4.8.1. credit reporting bodies;
 - 4.8.2. organisation that GrainCorp has an arrangement with to jointly provide or offer products;
 - 4.8.3. organisations where GrainCorp may have a relationship to share information for marketing purposes;
 - 4.8.4. related entities within the GrainCorp Group; or
 - 4.8.5. third party referrals.

- 4.9. The personal information collected may be used or disclosed for the GrainCorp's business purposes including (but not limited to):
 - 4.9.1. to administer and manage the commercial relationship between the individual and GrainCorp;
 - 4.9.2. to send e-mails or direct marketing material to the individual, providing general information about products or services offered by GrainCorp or available from other persons nominated by GrainCorp, but only with the express consent of the user to do so; and
 - 4.9.3. to efficiently and effectively manage GrainCorp's business operations.

5 Collection of unsolicited Personal Information

- 5.1. From time to time GrainCorp may receive personal information from others which was not solicited.
- 5.2. If GrainCorp receives unsolicited personal information, the company is required to determine whether it could have collected the information in accordance with Australian Privacy Principle 3. If GrainCorp cannot meet this requirement, the company will destroy or de-identify the information, if it is lawful and reasonable to do so. However, if GrainCorp can satisfy the test, the company will retain the personal information and handle it in accordance with this Privacy Policy and the Australian Privacy Principles.

6 Collection of information for employment purposes

- 6.1. When you subscribe to our online job vacancy website, we will collect more specific personal information about you, such as your name, email address and telephone number, qualifications or career history. We may also ask you for other information, such as information on your interests and the types of jobs you are interested in. The personal information you provide to GrainCorp via this job vacancy website will only be processed for the purpose of considering employment or graduate positions with GrainCorp, and if you work for us, in any way connected to your employment.
- 6.2. Sensitive information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sexual orientation and sex life, genetic data, biometric data, litigation or convictions will only be collected and processed by GrainCorp if such processing is necessary to comply with laws and regulations, or where you provide this information voluntarily or otherwise consent for us to do so.
- 6.3. From time to time, we may ask for sensitive information concerning your health. Health information used by us to assess your suitability for conducting certain forms of work (i.e. manual handling, working at heights etc), to ensure your continued safety and the safety of other at our workplace.
- 6.4. Further information about the collection of your personal information for employment purposes can be found in our Candidate Privacy Statement, available on our job vacancy website or by contacting recruitment@graincorp.com.au

7 How do we manage your Personal Information?

- 7.1. The personal information we collect from you may be stored electronically or in hard copy. Privacy protection is an essential component of GrainCorp's operational requirements and business integrity, and we will take all reasonable steps to ensure that:

- 7.1.1. Personal information held in paper or electronic form is safe and secure and that it is protected from misuse, interference, loss, unauthorised access, modification or disclosure; and
 - 7.1.2. Personal information is only used by employees or disclosed to other organisations to the extent necessary for GrainCorp's business purposes
- 7.2. GrainCorp has security systems in place to ensure your electronically stored personal information is kept secure (i.e. firewalls, virus and intrusion detection, etc). Hard copy information is retained at GrainCorp offices and facilities, and in some cases third party facilities, and we take all reasonable steps to ensure that the information is kept secure in its physical form.
- 7.3. GrainCorp may contain personal information about you that the business no longer needs. We will take reasonable steps to destroy or de-identify this personal information, in accordance with our document retention procedures, and any obligations under Australian Law.
- 7.4. If you access secured sections of our website, we employ encryption technology for storage and transmission of personal information using this medium.

8 Accuracy and quality of Personal Information

- 8.1. GrainCorp will take reasonable steps to ensure that the personal information we collect, use or disclose is correct, complete and up to date. From time to time we may contact/remind you to update your personal information, or implement other processes by which you can update your personal information yourself. Any inaccurate personal information held will be corrected promptly when it is identified.

9 Anonymity and Pseudonymity

- 9.1. Individuals may choose to remain anonymous or use a pseudonym when dealing with GrainCorp; however, GrainCorp reserves the right to refuse all products and services if such anonymity or pseudonymity is impracticable to our operations.
- 9.2. There may be situations where it will not be impracticable for you to be anonymous or use a pseudonym. Such situations include:
 - 9.2.1. Telephone or email communications with GrainCorp that request general information about products and services we offer;
 - 9.2.2. Lodging complaints in writing or verbally; or
 - 9.2.3. Some circumstances where you can purchase goods for cash.

10 Direct marketing

10.1. GrainCorp offers a broad range of products and services, and from time to time we engage in direct marketing to communicate these offering to you. Should you wish to “opt-out” of the direct marketing communication, you can do so by following the instructions in that communication, or alternatively contact the Privacy Officer (contact information at the conclusion of this policy) with details of the communication and your wish to “opt-out”.

11 Consent to use or disclose your Personal Information

11.1. There may be circumstances in which we require your consent to use or disclose your personal information. We require your consent if we intend to use your information for a purpose unrelated to the purpose for which we collected it.

11.2. Your consent may be express (i.e. you agree to the specific use by signing a form or ticking a box), or it may be implied (i.e. your consent is granted if you have agreed to general terms and conditions which may contain information concerning use or disclosure).

12 Disclosure of personal information within Australia and overseas

12.1. Where necessary for its business purposes, GrainCorp may disclose personal information to other organisations such as its service providers, bulk handling and marketing companies, regulators, banks or other companies within the GrainCorp Group. GrainCorp will require these organisation to adhere to strict privacy protection requirements and also seek privacy protection obligations in relation to information disclosed by GrainCorp in these circumstances.

12.2. GrainCorp may also need to disclose information by law, for statutory reporting purposes or in order to prevent breaches of the law. Details of these disclosure will be included in the privacy statements given by GrainCorp, made in connection with grower deliveries and also in connection with associated financial and trading products.

12.3. From time to time we may disclose your personal information to the authorities; our advisors; suppliers of IT, recruitment, investigation or other third parties engage by GrainCorp to provide services; to protect any intellectual property rights in any material displayed on or otherwise available from our website; and to enforce our website Terms of Use.

12.4. GrainCorp is an international business that operates globally, and we may share all of the personal information you submit to us with any related body corporate of the GrainCorp Group. A list of related bodies corporate to GrainCorp Limited is attached to

this Policy. GrainCorp has direct operations in the following countries: Australia, New Zealand, Singapore, China, India, the United Kingdom and Canada. GrainCorp entities in these countries are required to maintain the confidentiality of this information and are restricted from using it for any purpose other than the purposes set out in this Privacy Policy.

- 12.5. However, the cross-border privacy protection principles will not apply to the personal information we hold about you if a permitted general situation exists, which may include: lessening or preventing a serious threat to life health or safety; taking appropriate action in relation to suspected unlawful activity or serious misconduct; locating a missing person; necessary for diplomatic or consular function or activity; or, necessary for certain Defence force activities outside of Australia.

13 Destruction and de-identification of personal information

- 13.1. GrainCorp will take all reasonable steps to de-identify or destroy personal information when it is no longer required for one of GrainCorp's business functions or activities or for legal requirements.

14 Access to and correction of Personal Information and the complaint process

- 14.1. Individuals have the right to request access to or correction of their personal information held by GrainCorp, or to make a complaint in relation to GrainCorp's handling of their personal information. For access requests, no lodgement fees will be charged, however, a fee may be charged by GrainCorp for the reasonable expenses incurred (such as searches or photocopying costs) in providing the information requested. There are some situations where GrainCorp is not required to give you access to or correct the personal information. These situations are outlined in APP 12.3 *Exception to Access* and APP13.3 *Refusal to Correct Information*. GrainCorp will explain in writing the reasons for refusing access or refusing correction and the mechanism available to complain about the refusal.
- 14.2. There may be circumstances in which GrainCorp is required to provide access to your personal information to third parties. Such circumstances could include an obligation to disclose your information under an Australian law or an order of a Court or Tribunal.
- 14.3. The Privacy Officer oversees privacy at GrainCorp, and is located at GrainCorp's head office in Sydney. Privacy related requests and complaints should be made in writing and referred directly to the Privacy Officer. Contact details for the Privacy Officer are outlined under "*Further Information*". All reasonable endeavours will be made to resolve complaints within 30 days of the lodgement. If you believe that GrainCorp has not

appropriately dealt with your request, you may refer this to the Office of the Australian Information Commissioner and the contact details are: phone, 1300 363 992 or email, enquiries@oaic.gov.au.

15 Credit Reporting

- 15.1. GrainCorp provides certain goods and services to customers on commercial credit terms. GrainCorp may need to handle personal information about customer credit worthiness in connection with those arrangements. This section applies in relation to that sort of personal information (“credit-related personal information”). Other sections of this Privacy Policy are particularly pertinent to this section dealing with access, correction, complaints, cross-border disclosure of personal information and how GrainCorp collects and holds personal information. There may be cases where GrainCorp is subject to further obligations under the Privacy Act and to the extent applicable, the Privacy (Credit Reporting) Code (collectively, the “Privacy Law”), and this Policy is not intended to limit or exclude those obligations.
- 15.2. If you apply for customer credit with GrainCorp Limited or its related bodies corporate, or you will be guaranteeing the obligations of a credit applicant, we may request a credit report about you from a credit reporting body (**CRB**). Credit reports contain credit related personal information about you, and we use these reports to assess your application and ability to repay credit. To obtain these reports, GrainCorp will disclose credit related personal information so that the CRB can accurately identify you.
- 15.3. We may, to the extent permitted under the Privacy Law collect, hold and disclose any types of credit-related personal information about a person, including:
- 15.3.1. Name, sex, date of birth, driver’s licence number, employer name and three most recent addresses;
 - 15.3.2. The fact that the person has applied for credit and the amount and type of credit limit;
 - 15.3.3. Confirmation of previous information requests to CRBs made by other credit providers, mortgage insurers and trade insurers;
 - 15.3.4. Details of the person’s credit providers;
 - 15.3.5. Start and end dates of credit arrangements and certain terms and conditions of those arrangements;
 - 15.3.6. Permitted payment default information, including information about related payment arrangements and subsequent repayment;
 - 15.3.7. Information about serious credit infringements (e.g. fraud);
 - 15.3.8. Information about adverse court judgements;

- 15.3.9. Publicly available information about the person's credit worthiness;
 - 15.3.10. Certain insolvency information from the National Personal Insolvency Index;
 - 15.3.11. Any credit score or credit risk assessment indicating a credit reporting body's or credit provider's analysis of your eligibility for credit.
- 15.4. Where we have collected credit-related information about you from CRB, we may use that information to produce our own assessments and ratings in respect of your credit worthiness.
- 15.5. GrainCorp may exchange credit-related personal information with CRBs as may be permitted under the Privacy Law to:
- 15.5.1. Assist CRBs to maintain information about you to provide to other credit providers in order for credit assessments to be undertaken;
 - 15.5.2. Assess a credit application made by you or an application to be a guarantor;
 - 15.5.3. Manage credit;
 - 15.5.4. Create assessments and ratings for your credit worthiness.
- 15.6. The CRBs to which we may disclose credit-related personal information are:

Dun and Bradstreet (Australia) Pty Ltd
479 St. Kilda Road, Melbourne VIC 3004
Phone: (03) 9828 3333
Web: www.dnb.com.au

QBE Insurance (Australia) Limited
388 George Street, Sydney NSW 2000
Phone: 133 723
Web: www.qbe.com.au

National Credit Insurance (Brokers) Pty Limited
Suite 10.02, Level 10, 77 Pacific Highway, North Sydney NSW 2060
Phone: 1800 676 693
Web: www.nci.com.au

Equifax Australia Information Services and Solutions Pty Limited

PO Box 964, North Sydney NSW 2059

Phone: 138 332

Web: www.equifax.com.au/contact

15.7. Under the Privacy Law, you have the right to request CRBs not to:

15.7.1. Use your credit-related personal information to determine your eligibility to receive direct marketing from credit providers; and

15.7.2. Use or disclose your credit-related personal information, if you have been or are likely to be a victim of fraud.

16 Third party websites

16.1. Other websites may be accessible via hyperlinks from the GrainCorp website however these third parties are not a party to or subject to GrainCorp's Privacy Policy. We recommend you review the privacy policy of such third parties if you wish to access their website from our links, and satisfy yourself of their procedures and policies regarding your personal information.

17 European data protection regulation

This section applies if you are based in the European Economic Area.

17.1. Who is responsible for your Personal Information

GrainCorp Limited (Australian Company Number 057 186 035) (and its related entities) is responsible for your personal information. Your information will be controlled and processed by GrainCorp Limited, unless it is controlled or processed by related entities (further information can be found in their privacy policies available on their websites).

17.2. What is the lawful basis for processing your Personal Information?

The lawful basis for GrainCorp processing your Personal Information will typically be one of the following:

17.2.1. Your consent;

17.2.2. The performance of a contract;

17.2.3. GrainCorp or our third parties' legitimate business interest; or

17.2.4. Compliance with our legal obligations

17.3. What rights do you have?

You have a number of rights concerning the Personal Information we hold about you.

You have the right to:

- 17.3.1. Request access to your Personal Information;
- 17.3.2. Ask us to rectify any inaccurate Personal Information;
- 17.3.3. Ask us to erase your Personal Information;
- 17.3.4. Ask us to restrict or block the processing of your Personal Information;
- 17.3.5. Port your Personal Information;
- 17.3.6. Object to our processing of your Personal Information;
- 17.3.7. Not be subject to automated decisions;
- 17.3.8. Withdraw your consent;

In addition to any other rights outlined elsewhere in this policy. If you wish to do any of the above, please send an email to privacy.officer@graincorp.com.au

17.4. Transferring your personal data abroad

There may be circumstances where we transfer your data from inside the EEA to outside the EEA. This may include countries which do not provide the same level of protection as the laws of your home country. We take steps to put in place appropriate or suitable safeguards to protect personal data being transferred, as outlined by the General Data Protection Regulation (EU) 2016/679 or other relevant laws.

17.5. What if you have a complaint?

If you have a concern or complaint regarding our processing of your Personal Information, please contact the Privacy Officer (Privacy Officer, GrainCorp Limited, PO Box A268 Sydney South NSW 1235); or by email at privacy.officer@graincorp.com.au.

If you are not satisfied with our response, you may raise your complaint to your national data privacy regulator.

18 Further information

For further information concerning this Privacy Policy please contact:

Privacy Officer

GrainCorp Limited

Level 20, Tower 2, International Towers, 200 Barangaroo Avenue, Sydney NSW 2000 AUS

P: +61 2 9325 9100

F: +61 2 9325 9180

E: privacy.officer@graincorp.com.au

19 Changes to this Policy

19.1. We reserve the right to update this policy at any time if it is deemed necessary, and we will publish the updated Policy on our website.

20 Overseas Disclosure to Related Bodies Corporate – List of GrainCorp Related Corporates

Related Body Corporate	Domicile/Country
GrainCorp Limited	Australia
GrainCorp Services Limited	Australia
GrainCorp Operations Limited	Australia
Vicgrain Pty Limited	Australia
Vicgrain (Assets) Pty Limited	Australia
Grainco Australia Pty Limited	Australia
GrainCorp Warehouse Cashflow Pty Ltd	Australia
Hunter Grain Pty Limited	Australia
Hunter Grain Transport Pty Limited	Australia
GrainCorp Oils Holdings Pty Ltd	Australia
GrainCorp Foods Australia Pty Ltd	Australia
GrainCorp Commodity Management (Holdings) Pty Ltd	Australia
GrainCorp Commodity Management Pty Limited	Australia
GrainCorp Oilseeds Pty Ltd	Australia
GrainCorp Ventures Pty Ltd	Australia
Auscol Pty Ltd	Australia
Champion Liquid Feeds Pty Limited	Australia

CarbonConnect Pty Ltd	Australia
CropConnect Pty Ltd	Australia
CropConnect Custodian Pty Ltd	Australia
CropConnect Holdings Pty Ltd	Australia
Nutrition Service Australia Pty Ltd	Australia
Performance Feeds Pty Limited	Australia
XF Australia Pty Ltd	Australia
X F Enterprises (Australia) Pty Limited	Australia
National Grower Registry Pty Ltd	Australia
GrainCorp Foods NZ Limited	New Zealand
GrainCorp Commodity Management (NZ) Limited	New Zealand
GrainCorp Feeds Limited	New Zealand
GrainCorp Liquid Terminals NZ Limited	New Zealand
GrainCorp Operations ASIA Pte Ltd	Singapore
Gardner Smith Commodities Trading (Shanghai) Co., Ltd	China
Shanghai Grand Port Liquid Storage Terminals Co., Ltd	China
GrainCorp India Private Limited	India
GrainCorp Europe (UK) Ltd	United Kingdom
GrainCorp (Black Sea) Holdings UK Ltd	United Kingdom
Saxon Agriculture Limited	United Kingdom
GrainCorp Canada Inc.	Canada
GrainCorp Operations Canada Inc.	Canada
GrainCorp Ukraine LLC	Ukraine