

Privacy Policy

Policy Number: **HRP 1200-2**

Date written: April 2023

Authorised by: Managing Director

Reviewed Date: April 2023

1. General

This Privacy Policy applies to all Personal Information collected by Riverina (Australia) Pty Limited ACN 010 755 254 (**Riverina**). Riverina is committed to complying with its obligations under the *Privacy Act 1988 (Act)* and the Australian Privacy Principles (**APP**) in respect of that information. If you are located in another jurisdiction, additional local requirements will apply.

In this policy, we explain how and why we collect your Personal Information, how we use it, and what controls you have over our use of it.

In this Privacy Policy:

- (a) "OAIC" means the Office of the Australian Information Commissioner;
- (b) "Personal Information" means information about you which personally identifies you or may reasonably be used to personally identify you;
- (c) "Sensitive Information" has the meaning given to that term in the Act;
- (d) "Services" means the manufacture and supply of animal stock feeds and supplements across Australia;
- (e) "we", "us" or "Riverina" means Riverina (Australia) Pty Limited ACN 010 755 254, a proprietary limited company trading under the name Riverina Stockfeeds and its associated entities as appropriate;
- (f) "Website" means <https://www.riverina.com.au/> or any other website from time to time from which the Services are promoted and/or delivered; and
- (g) "you" means you and anyone acting on your behalf or with your implied authority.

Please read this Privacy Policy carefully. Your use of any part of our Website or Services will constitute your consent to the collection, transfer, processing, storage, disclosure and other uses of your Personal Information in accordance with this Privacy Policy. If you do not agree with the terms and conditions of this Privacy Policy, please do not use our Website or Services.

2. What Personal Information do we collect?

We collect and hold various types of Personal Information, including:

- (a) personal details, including name and date of birth;
- (b) identity data including your name, date of birth, company name and username or similar identifier;
- (c) contact data including your contact details such as your billing and delivery address, email address and telephone number;
- (d) financial data including banking, credit card, billing or other payment information;

- (e) transaction data including details about payments to and from you and other details of services you have purchased from us;
- (f) technical data including your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website;
- (g) usage data including information about how you use our website, products and services;
- (h) marketing and communications data including your preferences in receiving marketing from us and our third parties and your communication preferences;
- (i) information necessary for or incidental to the provision of the Services;
- (j) any other Personal Information that may be required in order to facilitate your dealings with us;
- (k) government related identifiers (e.g. driver licence); and
- (l) vehicle information where an in-vehicle monitoring system has been fitted to collect telematics data designed to monitor driver behaviour or vehicle performance, including but not limited to:
 - (i) geolocation data, in respect of the location of the company vehicle and those in or around it at any time;
 - (ii) telematics (monitoring braking, speed, acceleration, fuel consumption and seat belt use); and
 - (iii) images and sound recordings of you where dashboard cameras are fitted in the future.

3. How do we collect Personal Information?

We may collect Personal Information from you when:

- (a) you access or use our Website;
- (b) you communicate with our employees or clients;
- (c) you deal with us in the course of business;
- (d) we solicit it from third parties in the course of our business;
- (e) we solicit it from third parties, for example, from your employment referees or interviews where you are applying to work for us;
- (f) you communicate with us through via email, telephone, SMS, our Website or social media;
- (g) you use or are otherwise in the vicinity of a company vehicle; or
- (h) you otherwise deal with us in the course of our business.

We may also collect Personal Information from third parties, including:

- (a) credit reporting agencies; and
- (b) law enforcement agencies.

Where we solicit Personal Information, we only collect:

- (a) non-Sensitive Information, if it is reasonably necessary for the services we provide; and

- (b) Sensitive Information, if it is reasonably necessary for or directly related to services we provide and you have consented to its collection, or its collection is permitted or authorised by law.

If we solicit Personal Information, we will generally solicit it directly from you, unless it is unreasonable or impracticable for us to do so. Where we collect Personal Information about you from a third party without your prior consent, we will take reasonable steps to inform you that we have collected Personal Information.

You have the right to deal with us anonymously or under a pseudonym unless it is impracticable for us to do so or unless we are required or authorised by law to only with identified individuals.

4. **How we store and protect Personal Information**

We prioritise the security of your Personal Information whilst it is in our possession. We may hold Personal Information in various forms, including but not limited to physical documents, electronic records, visual records and audio recordings. Physical files are kept securely inside our access controlled premises. Electronic files are stored securely on protected information systems and are only accessible through our secure network. We maintain physical security over our paper and electronic data stores, and confidentiality agreements form part of the employment contracts for all of our staff members and contractors.

We take reasonable steps to:

- (a) ensure that Personal Information we collect is accurate, up-to-date, complete and relevant, other than where it is only collected to provide advice in respect of a particular point in time, in which case we will seek to ensure it is accurate, complete and relevant as at that particular point in time;
- (b) ensure that Personal Information we use or disclose is accurate, up-to-date, complete and relevant, having regard to the purposes for which Personal Information is used or disclosed;
- (c) protect Personal Information from misuse, interference and loss, and from unauthorised access, modification or disclosure; and
- (d) destroy or de-identify Personal Information which we no longer need for the purposes for which it was collected, except where it is necessary to retain it in order to maintain ongoing records for our clients.

We cannot guarantee the security of information transmitted via the internet. As such, transmission of Personal Information via the internet is at your own risk and we cannot be held responsible for the security of such information.

5. **Why do we collect, hold, use and disclose Personal Information?**

We may collect, hold, use and disclose your Personal Information for the following purposes:

- (a) for the purpose(s) for which it was disclosed to or collected by us;
- (b) facilitating interactions with you in the course of operating our business;
- (c) responding to your enquiries and information requests;
- (d) providing services to our clients if it was validly collected for that purpose;
- (e) storing information at third-party data centres;
- (f) updating your Personal Information;
- (g) ensuring safety and complying with our legal obligations;

- (h) employing staff, including conducting criminal reference checks and other background checks permitted by law;
- (i) for secondary purposes where it would be reasonable to expect us to do so, and that secondary purpose is related (or directly related in the case of Sensitive Information) to the primary purpose for which it was collected; and
- (j) for any other purposes for which you have consented from time to time.

We may hire third parties to provide limited services on our behalf, such as processing payment transactions, or performing statistical analysis of our services. We will only provide those third parties with the personal information they need to deliver the specific services and take reasonable steps to ensure that these third parties maintain the confidentiality of your information and are prohibited from using that information except for the purposes for which it was supplied.

We may also disclose your personal information to authorised regulatory bodies or otherwise if required to do so by law.

6. Direct marketing

We will only send you direct marketing communications and information via mail, email and social media platforms about our Services with your consent. If you do not provide your consent to receive direct marketing communications, you may opt-out of receiving marketing communications from us by contacting us at the details below or by using opt-out facilities provided in our communications.

7. Overseas disclosure

We may need to disclose your Personal Information to our parent company located in Japan for purposes consistent with section 5 above. It is otherwise unlikely that we will need to disclose your Personal Information to an overseas recipient or otherwise store your Personal Information overseas.

If we are ever required to do so, we will obtain your informed consent or ensure that the overseas recipients comply with the APPs.

8. Using our website and cookies

To improve your experience on our website, we may use 'cookies': small data files that are served by our platform and stored on your device. These are used by us or third parties for a variety of purposes including to operate and personalise the website. Cookies may be used for recording preferences, conducting internal analytics, conducting research to improve our offering, assisting with marketing and delivering certain website functionality.

You may refuse to accept cookies by selecting the appropriate setting on your internet browser. However, please note that if you do this, you may not be able to use the full functionality of our Website.

9. Third party sites

For your convenience and to improve the usage of the Website and Services we may insert links to third-party websites, applications or resources, for which this Privacy Policy does not apply.

Riverina is not responsible for those third party websites, applications or resources. If you access such websites, applications or resources, you do so at your own risk and we make no representations or warranties regarding third parties' privacy practices. We encourage you to read the privacy statements/policies of every website, application or resource you use.

When we do link to a third party website, application or resource, this does not automatically imply that Riverina endorses that website, application, resource and their contents. Our Privacy Policy does not cover the use of cookies by any third parties.

10. Data Retention

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Where we anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, we may use this information indefinitely without further notice to you

11. **Accessing or correcting your Personal Information**

We are committed to maintaining accurate, timely, relevant and appropriate information.

Where requested, we will provide you with a copy of the Personal Information that we hold which relates to you, provided that the request is made in accordance with the APPs (contained in the Act). We will also update any inaccurate information about you if you inform us that the information is inaccurate, out of date, incomplete, irrelevant or misleading.

There are no charges for requesting access to or the correction of your Personal Information, however if the volume of information we hold is excessively large, we reserve our rights to charge you any reasonable administration fees (including fees for photocopying) associated with your request.

You can contact our privacy officer regarding access to or correction of your information by any of the following methods:

Email: privacy@riverina.com.au

Post: PO Box 1146, Milton QLD 4064

Phone: (07) 3007 6888

We will respond to those requests within 30 days in accordance with our obligations under the Act. If we refuse a request to access or correct Personal Information, where reasonable, we will provide you our reasons for doing so and information about your ability to complain about such refusal.

In order to protect the confidentiality of your Personal Information, details of your information will only ever be passed on to you where we are satisfied that the information relates to you. Accordingly, we may request documentation from you which confirms your identity before passing on any Personal Information which relates to you.

12. **Making a complaint**

If you have a complaint about our Privacy Policy or the collection, use, disposal or destruction of your Personal Information, your complaint should be directed in the first instance to our privacy officer at the details set out above.

We will investigate your complaint and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of Personal Information held by us about you in accordance with the Act. If you are not satisfied with the outcome of this process, then you may contact the OAIC.

13. **Privacy Policy changes**

We may change this Privacy Policy at our discretion. If we do so, the latest version of our privacy policy will be available on our Website at <https://www.riverina.com.au/> and it will apply to all your Personal Information held by us at that time.

14. **Further information**

If you require any further information or have any queries regarding our Privacy Policy, please contact our privacy officer at the details set out above.

Should you wish to read more information on the Act, we recommend that you visit the website of the OAIC at www.oaic.gov.au.