

Wilmar Sugar Australia Group Privacy Policy

Wilmar Sugar Australia Group recognises the need for privacy when it collects, stores, uses and from time to time, discloses personal information about its employees, customers, suppliers and other people and entities that it deals with in the normal course of its business.

Wilmar Sugar Australia Group respects people's privacy and recognises the need to handle information about people and entities responsibly and confidentially in accordance with its obligations under the relevant Australian and New Zealand legislation.

Consistent with this position, Wilmar Sugar Australia Group aims to protect people's privacy by implementing and promoting practices which ensure compliance with this policy and its obligations under the relevant legislation.

Specifically, it will:

- Educate individuals about their rights to privacy,
- Seek to ensure personal information is accurate and up to date,
- Provide access for individuals to any personal information it holds about them as permitted by law,
- Only use or disclose personal information for the purpose it was collected unless individual consent is obtained otherwise,
- Apply a higher standard of privacy for more sensitive personal information, and
- Ensure compliance with the relevant legislation, this policy, privacy standard and other related documents

Contravention of this Policy, the Privacy Standard, the Relevant Legislation and other related documents may result in:

- an investigation
- disciplinary action, and
- in serious cases, termination of employment.

This policy is in addition to and not in derogation from the Privacy Policy of Wilmar International Limited, the ultimate holding company of Wilmar Sugar Australia Group.

The detail about how this policy is applied, to whom it relates, its application to what information, and the extent of its coverage, is set out in detail in the [Wilmar Australia Group Privacy Standard, attached](#).

Wilmar Sugar Australia Group may amend or vary this Policy or related policy, standard or process documents from time to time in its absolute discretion.

Wilmar Sugar Australia Group Privacy Standard

Table of contents

1. Scope.....	3
2. Handling of Personal Information.....	3
3. Use and disclosure of Personal Information	3
4. Storage of Personal Information.....	4
5. Accuracy of Personal Information.....	4
6. Disclosure in accordance with the Principles.....	5
7. Access	5
8. Definitions	5
9. Contact point.....	6

1. Scope

This Privacy Standard applies to:

- employees who are involved in the management of information; and
- individuals and entities, including employees, job applicants, contractors, consultants, customers and suppliers of Wilmar Sugar Australia Group (referred to as Wilmar Sugar) and visitors to its website.
- Everyone in the Wilmar Sugar Australia Group and as such it is not limited to Australia

The types of activities and information that this Standard regulates are those set out in the Relevant Legislation.

2. Handling of Personal Information

Wilmar Sugar may collect, store, use and hold Personal Information about:

- its employees
- its contractors
- its consultants
- its customers
- its suppliers
- job applicants
- other people who may come into contact with Wilmar Sugar or one of Wilmar Sugar's businesses, and
- people who visit its website.

In summary, Personal Information is information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion and may include Sensitive Information.

The type of Personal Information Wilmar Sugar may collect includes a person's name, address, contact details, interest in areas of Wilmar Sugar's business, credit information, trading history and marketing information. It is not limited to an individual's information and can include that of an entity.

Wilmar Sugar may collect more specific information from employees, contractors, consultants, customers, suppliers and other persons who work in Wilmar Sugar's workplace such as their date of birth, bank account details, tax file number and taxation information such as HECS information, work history, health history, emergency contact details, references, superannuation information and contract specific information.

Wilmar Sugar generally only collects Personal Information from its website when it is provided voluntarily by the user. When an individual visits our website or downloads information from it, the Internet Service Provider ("ISP") makes a record of the visit and records the users' internet address and domain name and the date and time of the visit to the website.

3. Use and disclosure of Personal Information

In general, Wilmar Sugar uses Personal Information for various business related purposes, for example, to provide products or services, market products and enhance and maintain relationships with members of the public, employees, suppliers and contractors including by providing information.

Wilmar Sugar will use a person's Personal Information for the Primary Purpose or a reasonably related purpose. In summary, the Primary Purpose is the dominant reason for collecting the

Wilmar Sugar Australia Group Privacy Policy and Standard

information and will generally be connected to the relationship between Wilmar Sugar and the person from whom the information is being collected (for example job applicant, employee, contractor, customer, supplier).

Wilmar Sugar will tell contractors, suppliers or other non-employees the purposes for which it intends to use their Personal Information.

Wilmar Sugar will use the Personal Information for purposes other than the Primary Purpose or a reasonably related purposes if the relevant person's consent is obtained, or if it is otherwise entitled to do so under the Relevant Legislation.

Depending on the product or service concerned, Personal Information may be disclosed to:

- entities within Wilmar Sugar
- service providers and specialist advisers to Wilmar Sugar who have been contracted to provide us with administrative or other services
- insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law
- credit reporting or reference agencies or insurance investigators
- any relevant authority that is entitled to receive it, or
- a person authorised by an individual.

Generally, Wilmar Sugar requires that organisations outside Wilmar Sugar who, as a result of their relationship with Wilmar Sugar, handle or obtain Personal Information, comply with the Relevant Legislation.

In most cases, if an individual does not provide the Personal Information that Wilmar Sugar has requested, Wilmar Sugar may not be able to provide them with the relevant product or service.

If an individual provides Wilmar Sugar with Sensitive Information it will be used and disclosed only for the purpose for which it was provided or another directly related purpose, unless the individual agrees otherwise, or unless use or disclosure of this information is allowed or required by law.

4. Storage of Personal Information

Wilmar Sugar will make every effort to ensure that the Personal Information it holds is protected from misuse or unauthorised access, modification or disclosure, including by the implementation and enforcement of various security measures. However, Wilmar Sugar will not be responsible for any consequences arising out of unauthorised access to Personal Information.

The Internet is not a secure environment. If an individual uses the Internet to send Wilmar Sugar any information, including their email address, it is sent at their own risk.

Wilmar Sugar may destroy or permanently de-identify Personal Information and won't use it as required by the Relevant Legislation and Wilmar Sugar will not store Personal Information for longer than necessary. Where Wilmar Sugar no longer requires any Personal Information that Wilmar Sugar holds, Wilmar Sugar may destroy that Personal Information or remove details which may identify individuals.

5. Accuracy of Personal Information

Wilmar Sugar seeks to ensure that the Personal Information it holds is accurate and up-to-date. Wilmar Sugar realises that this information changes frequently with changes of address and other personal circumstances. Wilmar Sugar encourages people to update any Personal Information

6. Disclosure in accordance with the Principles

There are certain specified exceptions to the application of the Relevant Legislation including the National Privacy Principles and the Information Privacy Principles (or their relevant replacement).

Wilmar Sugar is exempt from complying with the National Privacy Principles in certain situations, which include:

- Employee Records: Wilmar Sugar can use or disclose information contained in Employee Records where it is directly related to the employment relationship. This applies to current and former employees. If Wilmar Sugar discloses Personal Information regarding employees to a third party, the third party will be bound by the Principles.
- Use in legal proceedings: where Wilmar Sugar has collected information for a purpose other than the Primary Purpose, it can use or disclose Personal Information where it reasonably believes that the use or disclosure is reasonably necessary for the preparation, or conduct of, proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.
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- Under the Information Privacy Principles, Wilmar Sugar must not disclose Personal Information unless it believes, on reasonable grounds, that it meets the criteria stipulated in the relevant legislation. For example, Wilmar Sugar may disclose Personal Information if the disclosure is authorised by the individual concerned, necessary for the conduct of proceedings or to avoid prejudice to the maintenance of the law, or the information is to be used in a form in which the individual concerned is not identified.

7. Access

Individuals may obtain access to any Personal Information which Wilmar Sugar holds about them, unless one of the exceptions in the Relevant Legislation applies.

To make a request to access information Wilmar Sugar holds about them, individuals should contact Wilmar Sugar in writing. Wilmar Sugar will require individuals to verify their identity and to specify what information they require. Where the request is accepted, Wilmar Sugar may charge a reasonable fee for providing access to the Personal information in accordance with the Relevant Legislation.

Wilmar Sugar's contact details are:

Wilmar Sugar Australia Limited
Level 1, Trinita 3
39 Delhi Road
North Ryde
NSW 2113

Web address: <http://www.wilmar-international.com/our-business/sugar/>

Wilmar Sugar is entitled to refuse a request to access Personal Information in particular circumstances, such as where providing access would be unlawful or would have an unreasonable impact on the privacy of other individuals.

8. Definitions

These definitions have the same meaning in the Related Documents.

Wilmar Sugar Australia Group Privacy Policy and Standard

“Disclosure” generally means the release of information to an outside body.

“Employee Record” is a record of Personal Information relating to the employment of the employee. This may include information about the employee’s health, terms and conditions of employment, training, any disciplinary action taken, resignation or termination of employment personal and emergency contact details, leave records, taxation, superannuation or banking details and the employee’s salary or wages.

“Primary Purpose” is the dominant reason for information being collected and will generally be connected to the relationship between Wilmar Sugar and the person from whom the information is being collected (for example job applicant, employee, contractor, customer, supplier).

“Personal Information” is information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion and may include Sensitive Information.

“Relevant Legislation” includes:

- Privacy Act 1988 (Cth) including the National Privacy Principles, and
- Privacy Act 1993 (New Zealand) including the Information Privacy Principles.
and any replacement or variation of these and any other relevant legislation affecting Personal information.

“Related Documents” means any relevant policy, standard or procedure that is applicable.

“Sensitive Information” is information or opinion 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, criminal record and/or health information and such information is not generally collected from members of the general public.

9. Contact point

If you have any queries about this Standard or Related Documents, please contact the Company Secretary, via the following link: [send a query](#).
