# TEYS AUSTRALIA PTY LTD and SUBSIDIARIES ('Teys/We/Us/Our')

#### **PRIVACY POLICY**

At Teys, your privacy is important to Us. This statement outlines our policy about how We manage Personal Information<sup>1</sup>. The policy relates to all of the entities named in the Schedule at the end of this document.

This policy is current as at 25 November 2014. From time to time, We may find it necessary to change this Privacy Policy to reflect changes in the law or our commercial activities. You can obtain the latest version of our Privacy Policy by contacting our Privacy Officer or visiting our website <a href="https://www.teysaust.com.au">www.teysaust.com.au</a>.

We recognise the importance of and are committed to the protection of personal privacy. We are bound by the Australian Privacy Principles (**APP's**) as provided for in the *Privacy Act 1988* (Cth) which came into effect on and from 12 March 2014. The APP's govern information collected from that date and prior collected information which is used from that date. This Policy has been developed as part of our ongoing commitment to the protection for the privacy of the individuals which whom We deal.

#### **Objectives**

The objectives of this Policy are to: -

- Establish a set of privacy standards to which We will comply to protect the privacy of individuals whose personal information We collect, use, disclose, store or handle;
- Demonstrate our ongoing commitment to protecting privacy and to address any privacy concerns individuals may have arising from our functions and activities;
- Describe the manner and purpose for which We collect, use, disclose, store and handle personal information;
- Describe how an individual may access their personal information and seek correction of the information;
- Describe how an individual may complain about a breach of the APP's by Us; and
- Ensure We comply with our obligations under the *Privacy Act 1988* (Cth) and *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth).

#### Who are We?

We are a processor, value adder, exporter, wholesaler and feedlotter of beef products based in Beenleigh, Biloela, Rockhampton, Condamine and Murgon in Queensland, Wagga Wagga, Tamworth and Jindalee in New South Wales, Charlton in Victoria and Naracoorte in South Australia. We export to Japan, USA, Korea, Taiwan, United Kingdom, China and other countries. Our group owns three feedlots, two value adding facilities and six processing facilities ("Our Business").

<sup>&</sup>lt;sup>1</sup> 'personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

<sup>(</sup>a) whether the information or opinion is true or not; and

<sup>(</sup>b) whether the information or opinion is recorded in a material form or not.

## What types of Personal Information do We collect and how?

#### Information about Our suppliers and contractors and prospective suppliers and contractors

We collect personal information about individuals involved or in the supply of goods and services to Us. This may include information about you if you are a representative, Director or Secretary of a company.

The information We collect includes your name, address and other contact details together with account information to allow Us to make payment to you. We may also collect and keep information about supplies that are made to Us, including in respect of the quantity and quality of beef cattle.

#### Information about Our customers

We collect personal information about customers (or their representatives, directors and company secretaries) to whom We sell goods or services [and also about individuals who provide a quarantee in respect of such arrangements].

This information may include your name, address and other contact details together with information about payments. It may also include information relating to the credit worthiness of Our customers and guarantors.

#### Information about Our employees

We keep information about current and former employees. Employee records in the course of an employment relationship may be exempt from the Australian Privacy Principles and where this applies will not be subject to this policy.

We also keep personal information about persons who apply to Us for employment. We do not use this information for any purposes other than assessing suitability as an employee or for employment related purposes.

#### Other circumstances of collection

We may collect personal information about you to help manage inquiries and complaints. This includes information about a request you make to access or correct personal information that We hold about you or to consider a complaint you make your privacy (see *further details below*).

We may sponsor or convene trade information nights. We may collect information about persons attending those functions and We will give those persons the opportunity to opt out from receiving any direct marketing materials from Us.

Accessing Our website may also collect personal information. When you connect to Our website your browser sends Us personal information. The information provided may include your Internet Protocol (IP) address and your browser type and language. We may also collect information about your usage (for example, through cookies) including when you use Our website, other sites you access from Our website, content upload and download, your usage of the services available on Our website and the other website users you connect with through Our website.

# How do We collect personal information?

We will generally try to collect personal information directly from you where it is practicable and reasonable to do so.

However in some circumstances We may collect personal information from publicly available sources such as ASIC records, telephone directories or the website of a company that employs the individual.

Depending on the context We may collect information about you from third party sources such as trade or personal referees that you nominate. We will obtain consent from you before collecting information from third parties where We are required to do so by law.

We will take such steps as are reasonable in the circumstances to ensure that you are aware that We have collected your personal information.

#### Sensitive information

Some types of information such as health information are regarded as sensitive information for the purposes of the APPs.

We do not usually collect sensitive information about you. However sometimes it is necessary to collect sensitive information. For example We may collect health information about contractors and prospective employees where this is necessary for the safe management or Our workplaces or if We need to do so to manage an emergency. We will usually try to collect this information from you directly or seek consent if We need to collect that information from a third party.

# How We use personal information?

We use the personal information We collect to: -

- Conduct Our Business including processing enquiries, assessing an application for credit and/or recovery of any amounts owed to Us and/or to register any security interest We may have in connection with your credit account on the Personal Property Securities Register or other security register;
- Obtain from a credit reporting agency a credit report containing personal information about you in relation to consumer or commercial credit or other relevant information; and
- Maintaining Our business information systems.

We do not use any personal information for direct marketing purposes.

#### To whom do We disclose personal information?

We may disclose your personal information to other entities within the corporate group stated in the Schedule.

We do not sell or disclose the personal information that We hold about you to any other person for direct marketing by that other person.

We may disclose personal information about you where this is necessary for the purposes stated above. For example We may disclose information about a customer's name and address where We engage a contractor to deliver beef or other goods to the customer on our behalf. We will take reasonable steps to protect your personal information when We do so.

We may also disclose your personal information to;

- our professional advisors such as auditors and solicitors;
- persons that you have nominated as your personal or trade referees;

- law enforcement authorities or government agencies where We are authorised or required by law to do so (for example in relation to the investigation or a crime or an incident occurring on one of our workplaces)
- to emergency services to manage a threat to health or safety

## Where do We store, manage and protect Personal Information?

We keep personal information in both electronic and paper based records.

We expect our staff to comply with certain standards of behaviour when dealing with personal information. We train all our relevant staff about the need to protect your privacy and We will regard breaches of the Australian Privacy Principles as serious matters.

We will take such steps as are reasonable in the circumstances to ensure that your personal information is protected from misuse, interference and loss and that it is not subject to unauthorised access, modification or disclosure.

For example We will keep paper based records on secure premises away from the general public. We will keep electronic records in a secure system with password protection and restricted access both internally and from external sources.

We will generally keep personal information for a period of up to 7 years after the completion of a transaction for legal reasons. After that time We will de-identify or destroy the personal information.

If We adopt a third party to assist in our data management then We will only select a service provider that We consider to be reputable and who in our view has adopted (and who undertakes to maintain) appropriate security measures to protect the security and integrity of personal information to which that third party has access.

## How do We make sure that information is accurate, complete and up to date?

We try to ensure that any personal information that We hold is accurate complete and up to date. We do this by collecting information about a person so far as possible from the person. When We become aware that the information is inaccurate, incomplete or out of date, We will correct that information or if necessary delete it from our records.

#### How can you access or correct your personal information?

#### Requesting Access

You have the right to access personal information that We hold about you under the Australian Privacy Principles subject to certain exemptions. We will tell you if one of these exemptions applies unless it is unreasonable in the circumstances for Us to do so.

Contact details for making a request in writing or by telephone to access your personal information are set out at the end of this Privacy Policy. When dealing with such a request;

- We will ask you to properly identify yourself before We agree to grant access to personal information held by Us.
- We may charge you a reasonable fee to cover any costs which We incur to respond to your request for access such as photocopying costs or facsimile charges. We will tell you in advance if We propose to impose such a fee. However We will not charge you a fee for making the request in the first place.

#### Requesting correction

You may request that We correct personal information that We hold about you if you believe that information is inaccurate, incomplete or misleading (having regard to the purpose for which it is held). Contact details are set out at the end of this Privacy Policy.

When dealing with such a request;

- We will respond within a reasonable time (generally this will be within 30 days);
- If We do not agree to make the a correction then We will tell you why (unless it is not reasonable in the circumstances for Us to do so). Our response will tell you how you can make a complaint and will include any other information that We are required by law to include in the response;
- If We refuse to make a correction We will comply with any obligation that We may have under the Australian Privacy Principles to associate with the information a statement that you consider the information to be inaccurate, incomplete or misleading; and
- We will not charge you a fee for making a request for correction or for associating a statement with the relevant personal information as described above.

# **Anonymity and Pseudonymity**

Individuals may choose to remain anonymous or use a pseudonym when dealing with Us; however We reserve the right to refuse all products and services if such anonymity or pseudonymity is impracticable to our operations.

There may be situations where it will be impracticable for you to be anonymous or use a pseudonym. Such situations includes: -

- Telephone or email communications with Us that request general information about products and services We offer; or
- Lodging complaints in writing or verbally.

# How can you make a complaint about breach of privacy?

If you consider that We have breached our obligations under the Privacy Act 1988 including the Australian Privacy Principles then you may make a complaint to Us directly by contacting Us using the contact details set out below. We recommend that you make your complaint in writing so that We can properly assess the complaint.

We will consider your complaint and respond to you within a reasonable time. Generally We will try to respond to you within 30 days of you making the complaint.

If you are still not satisfied with our response then you may consider further options in relation to taking your complaint further.

The Privacy Act also sets out procedures under which you may make a complaint to the body that regulates privacy in relation to personal information. You should contact the Office of the Australian Information Commissioner (OAIC) for details about how to make a complaint. Contact details are set out at the end of this policy.

#### Contacting Us about privacy issues

If you wish to:

- obtain more information about our Privacy policy;
- obtain access to personal information that We hold about you; or

• make a complaint because you believe that We have breached the Privacy Act 1988 including Australian Privacy Principles or this privacy policy,

then you may contact our Privacy Officer. We will investigate and respond to an inquiry or complaint promptly (usually within 14 to 30 days). Our Privacy Officer's contact details are:

Address: Privacy Officer

Teys Australia Pty Ltd 3/2728 Logan Road

Eight Mile Plains QLD 4118 Australia

Email: kirstyj@teysaust.com.au

Telephone: +617 3198 9270

If you make a complaint to our Privacy Officer but you are not satisfied with the response that you receive, you can contact the Privacy Commissioner at the Office of the Australian Information Commissioner (OAIC) to make a complaint.

You may obtain more details about making complaints to the Privacy Commissioner by visiting the OAIC website at <a href="http://www.oaic.gov.au">http://www.oaic.gov.au</a> or by calling the OAIC Enquiries Line on 1300 363 992.

**SCHEDULE** 

# **ENTITIES TO WHICH THIS PRIVACY POLICY STATEMENT RELATES**

# Teys Australia Pty Ltd and its subsidiaries:

Company Name	ABN	ACN
Teys Australia Pty Ltd	38 009 872 600	009 872 600
Teys Australia Management Pty Ltd	29 102 657 670	102 657 670
Teys Australia Beenleigh Pty Ltd	97 009 672 459	009 672 459
Teys Australia Biloela Pty Ltd	17 009 669 265	009 669 265
Teys Australia Naracoorte Pty Ltd	80 010 807 986	010 807 986
Teys Australia Condamine Pty Ltd	97 010 835 533	010 835 533
Teys Financial Services Pty Ltd	37 011 011 395	011 011 395
Teys Bros Japan Pty Ltd		065 440 146
Teys Australia Trading Pty Ltd	71 099 656 096	099 656 096
Teys Australia Central Queensland Pty Ltd	57 105 563 255	105 563 255
Teys Australia Food Solutions Pty Ltd	29 116 237 757	116 237 757
Teys Australia Distribution Pty Ltd	18 009 672 440	009 672 440
Teys Australia Holdings Pty Ltd	35 065 092 775	065 092 775
Consolidated Meat Holdings Unit Trust	57 423 645 967	No ACN
Teys Australia Meat Group Pty Ltd	65 065 093 709	065 093 709
Teys Australia Rockhampton	BN18987138	No ACN
Consolidated Meat Processors Unit Trust	94 251 772 234	No ACN
Teys Australia Property Pty Ltd	28 070 208 687	070 208 687
Teys Australia Murgon Pty Ltd	92 010 863 493	010 863 493
Teys (USA) Inc.	Registered Delaware USA	
Teys Global Foods Pty Ltd		169 689 267
Teys Australia Southern Pty Ltd	53 084 034 695	084 034 695
Teys Australia Wagga	BN98587407	No ACN
Teys Australia Tamworth	BN98587405	No ACN
Teys Australia Jindalee	BN98587401	No ACN
Teys Australia Southern Property Pty Ltd	41 151 609 200	151 609 200