

Privacy Policy

1. PRIVACY ACT

Inghams Group Limited (we, us or our) is an organisation for the purposes of the Privacy Act 1988 (Act) and is subject to the Australian Privacy Principles contained in the Act.

This Privacy Policy is intended to provide a general overview of our policies in respect of the handling and management of your personal information. Your personal information is any information or opinion about you that is capable of identifying you.

Other policies may override or supplement this Privacy Policy in certain circumstances. For example, when we collect personal information from you, we may advise a specific purpose for collecting that personal information, in which case we will handle your personal information in accordance with that purpose.

This Privacy Policy is intended to cover most personal information handled by us, but is not exhaustive. If you have any queries about our management of your personal information, please contact us for further information.

2. HOW WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

2.1 COLLECTION

We may collect personal information directly from you unless it is unreasonable or impracticable to do so, and will limit the personal information we collect to that which is reasonably necessary for our functions or activities.

We collect personal information in a number of ways, including:

- through application forms;
- by email or other written mechanism;
- in a telephone call;
- in person;
- through transactions;
- through our website;
- through our online systems;
- through surveillance cameras; and
- by technology that is used to support communications between us;



At or before the time or (if it is not reasonably practicable) as soon as practicable after we collect personal information, we will take reasonable steps to make you aware of:

- our identity and contact details;
- if we collected the Personal Information from a third party, the fact and circumstances of the collection;
- whether the collection is required or authorised by law;
- the purposes for which the information is being collected;
- the organisations to which we would usually disclose your information;
- the main consequences (if any) for you if you fail to provide all or some of the personal information,
- how you may access and seek correction of personal information held by the us and how you may complain about a breach of the APPs in accordance with this Policy; and
- whether we are likely to disclose your information to any overseas recipients as well as the countries in which any such recipients are located.

This Privacy Policy provides these details as they typically apply in most cases, however different details may apply depending on our specific interaction with you. If we do not notify you of such other details, the information in this Privacy Policy applies.

If you fail to provide personal information requested by us, there may be a range of consequences, for example we may be unable to process or respond to your request.

We may, in some circumstances, collect personal information about you from third parties, in which case we will take reasonable steps to notify you of that information and the circumstances of its collection. Specific circumstances where we collect personal information from third parties may include web hosting providers, service providers and our product promotions (which are drawn by third parties).

There will not usually be Australian laws or court/tribunal orders that require or authorise us to collect your personal information. However, if such laws or orders do apply, we will take reasonable steps to notify you of them.

Unsolicited personal information is personal information that we receive which it did not solicit. Unless we determine that we could have collected the personal information in line with the APPs or the information is contained within a Commonwealth record, we must destroy the information to ensure it is de-identified.

2.2 USE AND DISCLOSURE

We will generally only use or disclose your personal information for the purpose for which we collected it, and for related purposes we consider will be within your reasonable expectations. Otherwise, we will seek your consent prior to using or disclosing your personal information for another purpose (unless we are required or permitted by law to do so without seeking permission).



We generally use your personal information to:

- provide the service requested, respond to your enquiries, send you information that you request, or otherwise achieve the purpose for which the information was submitted to us;
- streamline and personalise your experience within our website, or tailor our information, services or products;
- enable your involvement in promotions and other activities you participate in;
- create aggregate data about our visitors and other statistics to allow for more efficient operation of our website;
- seek feedback from you and perform market research;
- contact you with marketing and promotional communications including special offers, promotions and information about the products and services offered by us;
- perform recruitment functions; and
- engage in other activities where required or permitted by law.

We may use personal information to contact you for marketing and promotional purposes. You may request not to receive these communications by contacting our Privacy Officer using the details set out in section 10 below, or by using the opt out function provided for in those communications. If you do not opt out in either of these ways you will be taken to have consented to receiving such communications from us.

There are no consequences of opting out of receiving our marketing and promotional communications except that you will no longer receive them, and you may elect to rejoin our marketing list at a later stage if you wish.

2.3 STORAGE

We will take reasonable steps to protect your personal information from misuse, interference and loss as well as unauthorised access, modification or disclosure. Information may be stored on secure third party servers.

Specific security measures we employ include password protection, firewalls, encryption and implementing regular software updates and security patches. We undertake regular monitoring and improvement of our practices and systems to ensure the effectiveness our security policies.

We will endeavour to destroy or de-identify your personal information as soon as it is no longer required by us (where permitted by law).

3. ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You may [contact us](#) to request access to or correction of the personal information about you that we hold. We may refuse to allow you to access or to correct your personal information if we are legally required or entitled to do so. If we do so, we will provide you with written reasons for the refusal (unless it is unreasonable to do so) and the options available to complain about the refusal.



We may require you to pay a fee in order to access your personal information held by us. We will advise the amount of the fee payable (if any) and explain the reasons for the fee once we have assessed your application for access. We will not charge a fee for you to lodge a request for access to or correction of your personal information.

If you lodge a request for access, we may provide you with access to your personal information in any of a number of ways (including, for example, supplying you with a copy or providing you with the opportunity to inspect it).

We will take reasonable steps to ensure that the personal information that we collect, use and disclose is accurate, up-to-date and complete. If we are satisfied that any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will amend our records accordingly.

Please notify us if your personal details change so that we may keep our records current.

4. KINDS OF PERSONAL INFORMATION WE COLLECT AND HOLD

The personal information about you we may collect and hold may depend on your relationship with us. For example:

- Customer: if you are a customer, we may collect and hold information including your name, address, email address, contact telephone number, gender and age.
- Supplier: if you are a supplier, we may collect and hold information including your name, address, email address, contact telephone number, business records, billing information, information about goods and services supplied by you.
- Candidate: if you are a candidate seeking employment with us, we may collect and hold information including your name, address, email address, contact telephone number, gender, age, employment history, references, resume, medical history, emergency contact, taxation details, qualifications and payment details.

We may also hold other personal information that you volunteer to us.

We do not generally collect (or, if it is provided by you to us, retain) any sensitive information about you unless for a specific purpose, such as a public health and safety purpose.

5. DISCLOSURE OF PERSONAL INFORMATION TO OTHER ORGANISATIONS AND OVERSEAS

- We may disclose your personal information to: certain contractors or subcontractors of ours that provide administrative or promotional services (for example, mail processing businesses, printers, market research companies or other service providers). We enter into contractual agreements with these organisations to ensure that information we disclose is used only for the limited purposes for which we have provided it; and
- our related bodies corporate. For example, we may disclose your information to our parent company and or subsidiary company, Inghams Group (NZ) Limited Pty Ltd located in New Zealand.



We may disclose your personal information to overseas recipients if it is required to fulfil the purpose for which we collected it, in which case we must take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles as required by Australian Privacy Principle 8. However, we are not generally likely to disclose personal information to overseas recipients except our related bodies corporate (as mentioned above).

6. ONLINE PRIVACY

This part of our Privacy Policy sets out the manner in which we handle your personal information in respect of online services provided to you by us. "Online services" includes any services provided by us via the Internet (including email and web pages).

Generally, we collect personal information about you in the following circumstances:

you register as a user of our website;

you send us an e-mail or otherwise contact us (e.g. by telephone);

you post a message to our message board;

you give us personal information when using any part of the website; or

you use our services.

6.1 AUTOMATIC SERVER LOGS

Our website server automatically collects various items of information when you use our website, including:

your IP (Internet Protocol) address (which, in general terms, is a unique identifier assigned to your computer when it is connected to the Internet);

the operating system and Internet browser software you are currently using; and

the data that you download (such as web pages or other document files or software), and the time that you download it.

We do not attempt to identify people using this information, and only use it for statistical analysis, system administration, and similar related purposes. This information is not disclosed to any other party.

6.2 COOKIES

We use a feature of your Internet browser called a "cookie" to assign a user ID when you use our website. Cookies identify your computer to our servers when you visit our website. Our website may store cookies on your computer in order to improve your future visits to the website. By using cookies, we can track information about your usage of the site and to provide customised content. If you do not want information collected through the use of cookies, you may be able to configure your Internet browser to disable cookies.

6.3 EMAIL AND MESSAGE FORMS

We may collect personal information from you (such as your name, address, telephone number and email address, and any other personal information you volunteer) if you send us email or if you submit information to us using a message or feedback form. We will use this personal information to contact you to respond to your message, to send you information that you request, and for other related purposes we consider are within your reasonable expectations. We will not use or disclose any such information for any other purpose without your consent.

6.4 STORAGE AND TRANSMISSION OF PERSONAL INFORMATION ONLINE

If you provide any personal information to us via our online services (including email) or if we provide such information to you by such means, the privacy, security and integrity of this information cannot be guaranteed during its transmission unless we have indicated beforehand that a particular transaction or transmission of information will be protected (for example, by encryption).

If we receive your personal information, we will take reasonable steps to store it such that unauthorised access, modification, disclosure, misuse and loss are prevented.

6.5 OTHER ONLINE SERVICES

If any of our online services (including any email messages we send to you) contain links to other online services that are not maintained by us (other services), or if other services link to our online services, we are not responsible for the privacy practices of the organisations that operate those other services, and by providing such links we do not endorse or approve the other services. This Privacy Policy applies only in respect of our online services.

7. ANONYMITY AND PSEUDONYMITY

You have the option of not identifying yourself, or using a pseudonym, when dealing with us in relation to any particular matter, provided this does not apply:

- Where we are required or authorised by or under law, or a court or tribunal order, to deal with individuals who have identified themselves; or
- Where it is impracticable for us to deal with individuals who have not identified themselves or who have used a pseudonym.

However, if you do not provide us with your personal information when requested, we may not be able to respond to your requests or provide you with the goods or services you are requesting.

8. CHANGES

We reserve the right to amend this Privacy Policy at any time. We will endeavour to have our current Privacy Policy available on our website at all times. You may obtain a copy of the current version of our Privacy Policy by contacting us.



9. COMPLAINTS

If you believe that a breach of your privacy has occurred, we encourage you to contact us to discuss your concerns. Our contact details can be found in section 10 below.

Your complaint will be considered and dealt with by our Privacy Officer. If the breach is deemed to be serious, the Privacy Officer may escalate the complaint internally within our company.

Please allow us a reasonable time to respond to your complaint. If you are not satisfied with our resolution, you may make a complaint to the Office of the Australian Privacy Commissioner whose contact details can be found at: <http://www.oaic.gov.au/>.

10. FURTHER INFORMATION

You may contact us if you require further information about the ways we manage your personal information.

10.1 CONTACT INFORMATION

Inghams Group Limited

CONTACT US

Privacy Officer
Inghams Enterprises Pty Limited
Locked Bag 2039
North Ryde NSW 1670
E-mail: peopleandperformance@ingham.com.au

13 December 2021