

PRIVACY POLICY

Privacy

Sabrands Australia Management Pty Ltd (of which Rosella, Sunraysia, Blue Banner, CLR, Devondale, and O’Cedar are consumer brands) is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information. We respect your privacy and are committed to ensuring all information we collect or hold is handled respectfully and in accordance with relevant privacy laws.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/privacy>.

Scope

This policy applies and provides guidance to all consumers, customers, clients, service providers, employees, casual employees, contractors, trainees, subcontractors, board members, owners, and volunteers and any other relevant party.

Personal and Sensitive information

What is Personal information and why do we collect it?

Personal Information is a broad range of information or an opinion that could identify an individual. Examples of Personal Information that could identify an individual include your name, contact details, identification details, qualifications, employment history, addresses, email addresses, phone, and facsimile numbers. We may also collect details about your age, sex, date of birth, hobbies and interests and other personal information about you or others.

Personal information may be collected by us so we can:

- Access job applicants’ suitability for employment including, interviews, when recruiting and receiving resumes either directly (e.g., in response to a job advertisement such as on Seek, unsolicited correspondence through LinkedIn or indirectly (e.g., from recruitment agencies);
- Correspondence, by telephone and facsimile, by email, via our websites and internet, from media and publications, from other publicly available sources, from cookies and from third parties. This may also be in response to an inquiry;
- Administer a competition entry;
- Provide or offer you products or other benefits;

- Identify our customers or potential customers;
- Monitor product performance and research and analyse consumer demands and requirements and purchasing behaviour and
- Conduct our business and provide our products in a professional and efficient manner.

We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing.

If we are not provided with all the personal information we request, we may be unable to accept your competition entry, respond to your complaints or queries, assess your employment application, provide you with certain information, replacement products or documents (including our newsletters) or otherwise correspond with you.

Unless it is unreasonable or impractical, we typically collect personal information directly from the individual concerned. However, in certain circumstances, we collect personal information (including sensitive information) from our retail partners (e.g. Coles, Woolworths, IGA etc.) who may disclose details regarding consumer complaints to us, where the nature of the complaint is such that it is necessary as a matter of public health and safety that we are made aware of and can respond to, the circumstances that gave rise to the complaint.

We may also collect personal information from our sponsors, affiliates, or partners, where you have provided your consent to your personal information being disclosed to us. Where we are required and at liberty to do so, we will use our best endeavours to seek an individual's consent before obtaining their personal information from third parties.

We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

When we collect Personal Information, we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political

association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record, or health information.

We may collect sensitive information about you or others when you deal with us over the phone, online or in person including details regarding health or medical conditions. This sensitive information is de-identified and entered into our databases for the purpose of monitoring trends in consumer attitudes and behaviour so that we can adapt our products to meet our customers' evolving needs and requirements.

Where we are required to and it is practicable to do so, we will seek your consent before collecting your sensitive information and inform you of the purpose of the collection at that time. Your consent to collection of your sensitive information may be implied in limited circumstances.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained;
- For a secondary purpose that is directly related to the primary purpose;
- With your consent; or where required or authorised by law.

Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties, our employees (such as details of family members or next of kin) or publicly available information. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Use of personal information

We will use personal information for purposes that include:

- to identify individuals and protect them from unauthorised access to their personal information or account.
- to provide products or services that we are obliged to provide;
- to improve our products or services;
- where disclosure is reasonably necessary for the establishment, exercise, or defence of a legal or equitable claim;
- for the purpose for which it was collected, or for a related purpose (or a directly related purpose in the case of sensitive information);
- where the individual concerned would reasonably expect us to use the information;
- for any other purpose, where an individual has consented to its use for that purpose.

Disclosure of information

Except where indicated above, we will not disclose personal information to a third party unless:

- the disclosure is for a primary purpose for which the information was collected;
- the individual concerned has consented to the disclosure;
- the third party is our agent, partner (e.g., promotional agencies that administer our competitions), stakeholder or contractor (e.g., courier companies who deliver our products), in which case we will require them to disclose and to use the personal information only for the purpose for which it was disclosed;
- the disclosure is to a related body corporate;
- the disclosure is reasonably necessary for the establishment, exercise, or defence of a legal or equitable claim; or
- the disclosure is permitted, required, or authorised by or under law.

The types of information we collect and why

We collect personal information from individuals as required to conduct our business operations. This includes when individuals use our website, apply for a position, work with us, attend our office, or engage with us in other ways. We collect, store, and disclose this personal information to:

- Manage our operations
- Protect and enforce our legal rights and obligations
- Comply with applicable laws, regulations and Sabrands Code of Conduct, policies, and standards
- Assist us with queries raised
- Consider applications from prospective employees or contractors

We also collect some personal information pursuant to laws including, in Australia, The Fair Work Act, Superannuation Guarantee (Administration Act), the Income Tax Assessment Act and other tax laws, occupational health and Safety acts and workers compensations acts.

Information collected via our website

To ensure we are meeting the needs and requirements of our website users and to develop our online services, we may collect data by a data analytic program. We may use this program to track use of our website, and to compile statistics on visits to the site in an aggregated form and log anonymous information such as:

- the postcode of a user's server;

- the date and time of a user's visit;
- the pages a user accessed or downloaded; and
- the type of browser was used.

Marketing

We may use personal information to advise the individual concerned of new products and marketing initiatives that we think may be of interest to them. Those who prefer not to receive information about our services can contact our Privacy Officer and request to be removed from the relevant circulation list. Contact details for our Privacy Officer appear at the end of this policy. We may require written confirmation of a request to be removed from our circulation list, for example where legislation requires us to provide communications to the individual concerned.

If we intend to use or disclose your personal information in ways not described in this Policy, we will give you prior notification.

Sometimes, we may collect sensitive information including from our employees and contractors to:

- Comply with workplace or equal opportunity laws and to improve our workplace diversity; and
- Conduct criminal record or medical checks

Where appropriate, we would confirm consent from employees before collecting such information. We may not be able to do the things described above if we are unable to collect your personal information. For example, we may not be able to communicate with you, or process your request or application.

If you do not want Sabrands to use your personal information in a particular way, you can contact our Privacy Officer (details below) to discuss how we can limit the collection, use or disclosure of your personal information.

Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances.

We may disclose certain information and collect it from third party service providers (including recruitment, payroll, superannuation, training, investigation, legal, insurance), professional advisors, agents and other third parties who assist us with our business operations. We may also

make other disclosures to referees and other employers seeking a reference and members of the public on request, in accordance with company laws. There may be other times where we are required or authorised by law to disclose privacy information.

Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification, or disclosure. We use physical and electronic measures to protect personal information, including taking steps to restrict access to databases, maintain firewalls and encrypt data.

The personal information that we collect will usually be recorded in hard copy files designated for the purpose for which the personal information was collected and updated on our computer databases and/or data storage service provider. The protection of personal information is a priority for us. Electronic client data is kept on a shared drive which is in Australia with access limited to staff.

However, the internet is not a secure environment and no computer system is perfectly secure. Although all care is taken, Sabrands cannot guarantee the security of information provided to us. This means there is always a risk that your personal information may be accessed or used without authorisation.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. We only keep your personal information as long as required to conduct our business operations and maintain an appropriate record of our relationship with you. If we are legally required to keep your personal information for a certain period of time, we will do so. Most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Access to your Personal Information

You can request access to the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Sabrands will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information, we may require identification and a need to verify your identity before releasing the requested information.

In some circumstances we may not be able to provide you with all personal information or data we have about you (for example, when a legal exemption applies). If we cannot provide you access, we will tell you why.

Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete, and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Policy Updates

Sabrands may update this Policy from time to time. We encourage you to check our Sabrands websites regularly to ensure you are aware of the current policy.

If you have any questions or concerns, please contact our privacy officer that is listed below.

Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy, please contact us at:

Privacy Officer
Sabrands Australia Management (Pty) Ltd
121 Cecil Street, South Melbourne
Victoria Australia
T: +61 3 9608 8700
E: enquiries@sabrands.com

We are committed to any responding to any complaints you may have and we will investigate and respond to you promptly.

Our website

We may use cookies and IP address tracking to administer our Sabrands websites to improve our service and content. Information collected through cookies and IP address tracking may include your email address and device details. We may also track patterns of use and visitors to our website. We do not seek to identify individuals through cookies or IP tracking. Our websites may use Google Services such as Google analytics. For more about how Google collects and processes their data, please see Googles privacy policy and their information at www.google.com/policies/privacy/partners/.

David Spitzer

Signed: **David Spitzer**

Chief Executive Officer

5 December 2023