

PRIVACY POLICY

01.07.2019

Chapter 1.4

Page 1 of 8

Thomas Warburton Pty Ltd (ABN/ACN 43 105 050 824) (referred to as "Thomas Warburton", "we" and "us") recognises that the privacy of your personal information is important to you and we are committed to protecting the privacy of any personal information we collect from you. Unless you give us your consent to do otherwise, we will only collect, use, store and disclose your personal information in accordance with this Privacy Policy.

We abide by the Australian Privacy Principles ("**APPs**") under the *Privacy Act 1988* (Cth) ("**Privacy Act**"). This Privacy Policy outlines how we will handle and manage your personal information. You can obtain information about the APPs and your privacy rights at the website of the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/privacy-law/>. Our Credit Information Policy (available [here](#)) will apply where we manage your credit information and/or credit eligibility information (for example, when offering credit services). That policy is our credit reporting policy for the purposes of Part IIIA of the Privacy Act.

Observing and protecting the confidentiality of your personal information is an essential aspect of the conduct of our business. We generally disclose such information only in accordance with our Privacy Policy.

What information do we collect?

We primarily collect personal information that is necessary for us to provide our products and services to you. Personal information is any information that can be used to identify you and may include:

- your name, address and contact details (including telephone numbers and email address);
- your work contact details including name, telephone numbers, work address and email address if you are our customer or supplier;
- information about your dealings with us about our products and / or services;
- images captured by Closed Circuit Television (CCTV) systems used by us for 24 hour video surveillance if you visit any of our offices;
- other personal information but not limited to, information you may disclose to us when you contact us with a query or complaint, or where you request a product or service from us, or information about a product or service from us, or which is contained in any other communications between you and us.

PRIVACY POLICY

01.07.2019

Chapter 1.4

Page 2 of 8

Where relevant we may ask you for other information, for example, qualifications and employment history but not limited to, if you apply for employment with us.

Some of this information is considered by law to be “sensitive information” about you. This includes any information that tells us about your health and/or medical condition. This information is only collected where relevant and necessary to ensure that you are given appropriate guidance and support based on your specific circumstances.

How do we collect and hold your personal information?

We usually collect personal information in the following ways:

- directly from you, either in person, in documents, by email, telephone or via our website (including our E-Shop) when you, for example but not limited to:
- purchase products or services from us;
- enquire about our products or services generally;
- apply to work with us;
- participate in our promotions or competitions;
- participate in client satisfaction surveys or focus groups on proposed products;
- use our website or other applications; or
- visit one of our offices or distribution centres.
- from third parties who, for example, forward your details to us;
- from CCTV systems used by us for 24 hour surveillance, which monitor and record activities at all our premises Australia-wide, including in our offices, administration areas, and warehouses.
- from publicly available resources.

We can hold your personal information in hard copy and electronic files.

If your personal information is no longer needed, we will take reasonable steps to destroy or permanently de-identify it.

Collection of information from our website

When using our website, you may voluntarily disclose personal information to us. Our server may automatically record details such as your internet address, domain name if applicable, and the date and time of your visit to our website. If you access our website (or any part of it) via a social

PRIVACY POLICY

01.07.2019

Chapter 1.4

Page 3 of 8

media plugin (such as Facebook), you consent to us collecting, storing and using the information you make available to us via the plugin. If you have questions about how social media plugins work, you should check the terms of use of the relevant social media service.

This information we gather is used for internal purposes only, including statistical and marketing purposes.

We will try to not identify users or their browsing activities except as necessary to investigate or report any suspected unlawful activity, as required or authorised by law or as reasonably necessary for the activity of an enforcement body.

Our website uses cookies, which may collect personal information. Cookies are pieces of data stored on your browser that record information on your use of our website, such as details of your server and your browsing activity, and send the information to the server. We use these cookies to monitor usage of our website only. You may be able to change the settings of your browser so that cookies are not accepted generally or that you are provided with options to accept or reject them as they are sent to your browser. You might not be able to use the full functionality of our website by refusing the use of cookies.

In addition to web server logs, we also use third party web analytics, web beacons and similar technologies, such as Google Analytics, to collect or receive information in order to improve the performance and usability of our website.

Google Analytics use cookies to analyse how you view and use our website, for example, which pages you visit and how long you are on the site. Information collected by the cookies (including your IP address) is transferred to and stored on Google's servers (at the time of writing, in the United States, however caching and other technologies may mean that your activity data is stored in other locations). Google does not identify or associate your IP address with any other data held by Google.

Our site may also use Google AdWords Remarketing which will display advertisements to you based on what parts of our sites you have viewed by placing a cookie on your web browser. This cookie does not in any way identify you or give access to your computer or mobile device. Google AdWords Remarketing allows us to tailor our marketing to better suit your needs and only display advertisements that are relevant to you.

PRIVACY POLICY

01.07.2019

Chapter 1.4

Page 4 of 8

By using our website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy (available [here](#)) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie or use the [opt-out](#) service provided by Google however you may not be able to access all the features on our website to their full extent.

Why do we collect personal information and what are the consequences of not providing us with the information requested?

Generally, we collect personal information about you in the course of obtaining goods and services from you, in order to meet our obligations to you, to enable us to provide our products and services to you, to improve your experience with us and/or to enable us to address any enquiry or complaint you may have made. We also collect personal information so you can seek employment with us or communicate with us in writing, by e-mail, telephone or via our website. Our ability to meet our obligations to you, your business or to process any application may be adversely affected if you do not give us the requested personal information, or if the information you give us is incomplete or inaccurate.

We use CCTV systems for 24 hour video surveillance to:

- improve actual and perceived levels of safety;
- reduce the likelihood of graffiti, vandalism and anti-social behaviour around our premises;
- reduce incidents of criminal behaviour and aid in identifying and prosecuting offenders;
- reduce insurance excesses and premiums;
- assist in minimising and monitoring work health and safety issues and risks; and
- assist in tracking inward and outward movement of goods, particularly large value items.

How do we use your personal information?

We use personal information primarily to provide our products and services to you in the ordinary course of conducting our business and/or to obtain goods and services from you. We may also use personal information to:

- contact you to provide you with the information, materials or products and services you request;
- contact you to provide you with information and materials on our products and services that we think you may be interested in;

PRIVACY POLICY

01.07.2019

Chapter 1.4

Page 5 of 8

- provide you with our products and services;
- provide you with information about the products and services you are currently using;
- provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- provide you with information about promotions, monthly specials, competitions or upcoming events that we think you may be interested in;
- manage our relationship with you, including addressing any enquiries or complaints you may have, and to improve the services we provide;
- analyse and understand our client base, for example, by engaging third parties to conduct research on our behalf; and
- for a secondary purpose that is related to a purpose for which we collected it, where you would reasonably expect us to use your personal information for that secondary purpose;

If we intend to use your personal information for direct marketing, such as by adding you to a marketing database, and you have not already consented to this use, we will notify you and will provide you with an opportunity to opt out.

If you no longer wish to receive our email alerts you may opt out at any time by replying to the email using the unsubscribe facility.

To whom do we disclose personal information?

We will only disclose personal information for the purpose for which it was collected or in the following circumstances:

- to a member of Thomas Warburton, which means our subsidiaries, our ultimate holding company and its subsidiaries for consultation and reporting on relevant issues and for storage purposes, depending on where our storage facilities and/or servers are located;
- third parties including business partners, suppliers, sub-contractors and service providers who assist us in the conduct of our business;

PRIVACY POLICY

01.07.2019

Chapter 1.4

Page 6 of 8

- to market research companies for the purpose of analysing our client base and undertaking research on our behalf;
- in relation to personal information captured by CCTV, where required or permitted under the Privacy Act, which would include to any relevant law enforcement body and legal advisers where unlawful acts are suspected or, where occupational health and safety complaints have arisen, to workplace Health and Safety Officer(s) or our Insurer(s);
- where required or authorised by law or otherwise as permitted under the Privacy Act;
- where you consent or have authorised a third party to the disclosure;
- In the event of a sale, merger, liquidation, dissolution, reorganization or acquisition of Thomas Warburton, or a Thomas Warburton business or business unit, information we have collected about you may be sold or otherwise transferred. However, this will only happen if the party acquiring the information agrees to be bound by the terms of this Privacy Policy and the notice provided to you when the information was collected.

Cross-border disclosure of personal information

We may deal with third parties that have all or part of their operations located overseas. As a result, your personal information may be disclosed to a recipient in a foreign country, including but not limited to Germany.

How secure and accurate is your personal information?

We will take reasonable steps to ensure that all personal information we hold is:

- accurate, complete, up-to-date, relevant and not misleading;
- stored in a secure environment; and
- protected from misuse, interference and loss as well as unauthorised access, modification or disclosure.

Any personal information in the form of images captured by CCTV will be stored onsite at our premises and only accessible by specifically authorised employees in accordance with controlled access procedures. Images will be stored for a minimum of thirty (30) days.

PRIVACY POLICY

01.07.2019

Chapter 1.4

Page 7 of 8

If any of your details change, please let us know as soon as possible by using the contact details below so we can maintain the accuracy of your personal information.

How can you access and correct your personal information?

We seek to ensure that all personal information collected is accurate and complete. You have a right to access personal information we hold about you.

We will comply with any request to access your personal information that you send us by email at privacy@warburtons.com.au where the Privacy Act or the APPs allow us to refuse to do so. There is no fee for making a request to access your personal information but we may charge a fee for giving you access to your personal information in a mutually agreed format, usually by sighting the accessible information held on file. You also have the right to ask us to correct information about you that is inaccurate, incomplete, out-of-date, irrelevant or misleading. If we refuse to correct your personal information as requested, we must:

- notify you in writing of the reasons for the refusal (unless it would be unreasonable to do so) and how to complain of the refusal; and
- upon request from you that we associate a statement that the information is inaccurate, incomplete, out-of-date, irrelevant or misleading, take such steps as are reasonable in the circumstances to associate such a statement so that it will be apparent to users of the information.

Links to other websites

Our website may contain links to third party websites. The links are provided for convenience only and we are not responsible for the content or material contained in, or obtained through, any third party website or for the privacy practices of the third party website. We suggest that you review the privacy policy of each website that you visit.

Our links to the linked websites should in no way be construed as an endorsement, approval or recommendation by us of the owners or operators of the linked website or of the content, products or services contained on or referred to by the linked websites.

How can I contact Thomas Warburton?

If you have any questions or complaints about how we handle your personal information, you can contact our Privacy Compliance Officer as follows:

Mail: Privacy Compliance Officer

PRIVACY POLICY

01.07.2019

Chapter 1.4

Page 8 of 8

Thomas Warburton Pty Ltd
P.O. Box 4318
Dandenong South 3164
E- mail: privacy@warburtons.com.au
Phone: (03) 9574 3400
Attention: Privacy Compliance Officer c/o Customer Service Department

We will consider and respond to any complaint notified to us within a reasonable time, usually within 30 days. We will always endeavour to resolve any complaint to the best of your satisfaction.

Australian Privacy Commissioner

If you are not satisfied with the way in which we handle your enquiry or complaint, you can contact the Office of the Australian Privacy Commissioner on Tel: 1300 363 992 or email: enquiries@oaic.gov.au.

Data breaches

Suspected data breaches will be managed in accordance with our legal obligations as per the Notifiable Data Breaches (NDB) scheme under Part IIIC of the *Privacy Act 1988*.

Changes to this Privacy Policy

This is our current Privacy Policy outlining our personal information management practices. This Policy replaces any other privacy policy published by us to date. We may vary this policy from time to time. We encourage you to review our website regularly to ensure that you are aware of our current Privacy Policy.

Last updated – July 2019