Version History

Version	Date	Version update	Issued by
0.1	1 May 2020	Initial Release	Managing Director
1.1	13 Jun 2023	Annual Review	Chief People Officer
2.1	15 Jul 2025	Annual Review	HR Manager
3.1	18 Dec 2025	Annual Review	HR Manager

Document Approval

Version	Role	Name	Date approved
1.0	Managing Director	Joe Robinson	1 May 2020
2.0	Directors	AFF Board	13 June 2023
3.0	Directors	AFF Board	15 July 2025
4.0	Directors	AFF Board	3 Mar 2026

1. OVERVIEW

1.1 We respect the privacy of our staff, customers, suppliers and those who visit our website or engage with us.

1.2 We have implemented this policy to communicate what personal information we collect and how that personal information is used and safeguarded.

2. APPLICATION

2.1 This policy applies to:

Policy applies to	Tick
Customers and individuals who come into contact with AFF	✓
Employees	✓
Directors	✓
Officers	✓
Contractors	✓
Labour hire	✓
Volunteers	✓
Trainees	✓

2.2 The way this policy applies to an individual depends on the nature of their interaction with us. We recognise that individuals may engage with us in multiple capacities - for example, as employees, customers, contractors, or partners. Accordingly, this policy is designed to apply to each role the individual holds.

2.3 For instance, if an individual is both an employee and a customer, the policy will apply to that individual in both contexts.

3. OUR OBLIGATIONS

3.1 AFF is bound by privacy laws in Australia, including:

- The Australian Privacy Principles set out in the ***Privacy Act 1988*** (Cth) (**Privacy Act**)
- The credit reporting provisions of the Privacy Act and the applicable Credit Reporting Privacy Code (collectively the **Privacy Laws**)
- State and Territory privacy laws in Australia to the extent they apply in respect of any health information collected and handled.

3.2 Terms not defined in this policy have the same meaning given to them under the applicable Privacy Laws.

4. WHAT INFORMATION IS COLLECTED?

4.1 Depending on the nature of an individual's interaction with us, AFF may collect and hold the following personal information:

- Name, postal and email address
- Date of birth
- Gender
- Contact details, including telephone numbers (landline and mobile)
- Payment and bank details

- Credit card information
- Credit history and other financial information
- About our workers and applicants: Records relating to the employment or engagement of that individual, including in relation to:
  - Emergency contacts
  - Occupation details, work history and referees
  - Engagement, training, and discipline
  - Resignation and termination
  - Terms and conditions of employment or engagement
  - Performance and conduct
  - Hours of employment or engagement
  - Remuneration package, including salary or wages and any other monetary or non-monetary benefits
  - Membership of a professional or trade association or trade union
  - Leave and entitlements
  - Taxation, banking and superannuation affairs
  - Qualifications and licencing, including driving licences and driving licence number
  - Citizenship or immigration status, including type of visa held and right to work in Australia
  - Information from resume or job applications
  - An Australian Business Number (ABN), Australian Company Number (ACN), registered business name, or other company information that relates to an individual
  - Payment and bank details
  - Stories about an individual's employment with us
  - Criminal record checks in relation to certain roles
  - Health information about an individual, including in relation to an illness, injury, health care and treatment, vaccination history and status, and fitness for work (see clause 5.4 below).

4.2 We are authorised to collect tax file numbers (**TFNs**) by the *Income Tax Assessment Act 1936 (Cth)*. It is not compulsory to provide a TFN for our products and services, but if an individual does not, taxation law may require additional deductions to be made from amounts payable to that individual.

4.3 If the Personal Information we collect includes sensitive information, including health information, we will ask for the individual's consent to collect sensitive information, unless the law allows us to collect it without their consent.

4.4 AFF may also collect the following personal information which is classified as sensitive information under the Privacy Act:

- Aboriginal or Torres Strait Islander (TSI) status
- Ethnicity

- Health information through our Pre Employment Medical Form and processes, and for our employees in relation to an illness, injury, health care and treatment, vaccination history and status, and fitness for work.

5. HOW IS INFORMATION COLLECTED?

5.1 The information we collect is information necessary for our business activities and based on our relationship with the individual. We obtain personal information through:

- **Enquiries or feedback on our website or via email**: this includes information the individual gives us including their name, contact details (such as phone, email or address), enquiry details, opinion of our products and records of their communications with us.
- **Supply details**: when an individual supplies a product or service to us, or we supply product or services to them.
- **Credit related personal information**: is collected through AFF's credit application processes, that involves customers applying for and AFF agreeing to provide trade credit terms to customers, including but not limited to personal guarantees, payment information, credit checks including credit scores, financial statements and other information that a customer provides to us, and otherwise as set out at section 10 of this policy.
- **Social media**: this includes any information which the individual shares with us that is part of their public profile on a third party social network, or information they create and share with us by posting it to one of our social networks.
- **Recruitment and contractor engagements**: this includes information an individual gives us if they apply for a job with us. For recruiting purposes and/or if we engage an individual as a contractor, it may be necessary for us to request sensitive information from the individual.
- **Employees**: this includes information that AFF receives about an individual that relates to their employment with AFF.
- **Third parties**: generally speaking, AFF only collects personal information directly from the individual and our interactions with them in our business. However, AFF may obtain information from third parties, for example, businesses we acquire, and businesses we partner with for promotional purposes or third party institutions during consumer credit applications.
- **Visitors and contractors**: AFF manages visitor logs for all sites where personal information is collected directly from the individual. This includes name and contact details as well as information pertaining to the nature of the visit.

5.2 Sometimes we ask an individual to voluntarily provide personal information. This information generally includes, but is not limited to, their name, e-mail address, postal address, and telephone number. Wherever possible, AFF collects personal information from the person concerned with their (express or implied) consent, but we may obtain information about a person from others. Collection of information via third persons may take the form of details held by:

- Credit reporting bodies
- Organisations which AFF has an arrangement with to jointly provide or offer products
- Related entities to AFF
- Third party referrals

- Service providers engaged by AFF, including medical professionals engaged to provide medical assessment, certification, or vaccinations, and data providers engaged to provide relevant information on industry and customer contacts
- Government or regulatory bodies or authorities.

5.3 AFF does not intentionally collect information from children under the age of 13.

5.4 AFF may collect health information from employees, contractors, visitors and persons who enter its locations and any other persons from whom it is reasonably necessary to collect the information, where health information is reasonably necessary for, or directly related to, one of AFF's functions or activities, including for the purposes of:

- Managing risks to the health and safety of our workforce and stakeholders
- Determining the fitness for work of our employees and contractors
- Ensuring the quality and safety of our products for AFF's business operation, viability, and reputation
- Meeting our contractual commitments with third parties
- Ensuring compliance with applicable laws to AFF or individuals with whom AFF has a relationship, including work health and safety laws and public health directions.

6. COLLECTION OF UNSOLICITED PERSONAL INFORMATION

6.1 From time to time, AFF may receive personal information from others which was not solicited. If AFF receives unsolicited personal information, AFF will handle it having regard to the applicable Privacy Laws.

7. HOW DO WE MANAGE AND PROTECT PERSONAL INFORMATION?

7.1 The personal information and credit related personal information we collect may be stored in:

- Computer systems
- Electronic databases
- Digital archives
- Telephone systems and recordings
- Hard copy or paper files.

7.2 We aim to keep your personal information secure. Any personal information that is collected via our website or which is held on our computer systems is protected by technical safeguards.

7.3 If we find that we no longer require or have no further need for your personal information we may de-identify it or remove it from our systems and destroy all record of it.

8. HOW IS THE INFORMATION USED AND DISCLOSED?

8.1 Non-personal information is collected to allow us to analyse how our website is used and to improve the content and service the website provides. personal information is collected for analysis to improve the content of the website and the services we provide to our customers and suppliers.

8.2 AFF owns the collected information and must not sell, trade or rent the information to others. We may use the information to continue contact with an individual. This may include contact such as follow-up calls, e-mail correspondence, or mail correspondence to follow-up on the contact.

8.3 AFF may use and disclose personal information and credit related personal information for the following purposes:

- **Verification:** We may use and disclose personal information to verify an individual's identity when engaging with us.

- **Offers:** We may use personal information to inform an individual about other products and services offered by us which we consider may be of interest.

- **Marketing:** We may use and disclose personal information for any marketing, promotional, publicity or direct marketing that we or others may undertake in relation to AFF's or our related entities' products and services. You can opt out of marketing messages as set out under "Direct Marketing", below.

- **Legal requirements:** We may disclose personal information to legal and accounting firms, auditors, contractors, consultants and other advisors for the purpose of administering, and advising on, our business and for associated actions, including third parties in some circumstances or mergers or acquisitions of our business. Similarly, in the event that a portion or substantially all of our business or assets are sold or transferred to a third party, we may also disclose certain information including an individual's personal information to a purchaser or potential purchaser in connection with the sale or potential sale of us, our business or any of our assets, including in insolvency. We may also disclose personal information to investigate, review, mitigate risks associated with, and inform you of, a data or other security breach involving your personal information and comply with any of our other statutory and legal obligations.

- **Credit reporting:** If a customer (whether corporate or an individual) applies for credit we will collect personal information and disclose personal information (and other information provided in connection with the credit application) to other credit providers, trade referees and credit rating service providers.

- **Service providers:** At times we may engage third party companies to provide support for our various business functions including website hosting, cloud based providers and promotional agencies. Information may be accessed by those providers if necessary and on the basis that they comply with this Privacy Policy.

- **Employment:** We may use and disclose personal information of an employee for the purposes of their employment relationship with AFF, AFF's business requirements and reasonably expected secondary purposes (e.g. rostering, administration, payroll, finance, human resource management, and work health and safety management), participating in legal proceedings where employee records are relevant, and AFF's compliance with laws (including in relation to employment, industrial, and work health and safety laws and public health orders).

- **Contracting or other services:** We may use and disclose personal information for any contracting or other service provision for which the individual has given express or implied permission.

- **Use of Artificial Intelligence (AI):** We utilise AI technologies to support business operations, including service optimisation, data analysis, and process automation. These systems may process data to improve efficiency and user experience. We do not use AI for automated decision-making that produces effects reasonably be expected to significantly affect the rights or interests of an individual. Any data shared with third-party AI providers is subject to contractual and security controls to ensure compliance with applicable privacy laws and our internal standards.

- **Other:** We may use and disclose personal information for any other use associated with such purposes or for which the individual has given express or implied permission.

8.4 We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law, but we have no obligation to monitor the use of our website or to retain the content of any user session.

8.5 You consent to us using your personal information in the above ways and as set out in this policy.

8.6 We may otherwise collect, use or disclose your personal information where the collection, use or disclosure is:

- in accordance with this policy or any agreement you enter into with us, or
- required or authorised by law, including without limitation the Australian Privacy Principles under the *Privacy Act 1988 (Cth).*

9. OVERSEAS DISCLOSURES

9.1 Some of your personal information may be disclosed, transferred, stored, processed or used overseas by us, or by third party service providers. This may happen if:

- our offices or related entities are overseas – for instance, to Canada for our governance and compliance purposes
- we outsource certain activities overseas
- transactions, information, services or products have an overseas connection, or
- our computer systems including IT servers are located overseas.

9.2 You consent to the collection, use, storage, and processing of your personal information outside of Australia as set out in this policy.

9.3 In particular, your personal information may be disclosed to third parties in Canada and such other countries in which those parties or their, or our, computer systems may be located from time to time, where it may be used for the purposes described in this policy. In these circumstances, you consent to the collection, use, storage and processing of your personal information in those countries, without us being responsible under the *Privacy Act 1988 (Cth)* for such use (or for any breach). Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you might not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your personal information.

10. CREDIT REPORTING POLICY

10.1 This section 10 only applies if you apply for credit with AFF.

10.2 AFF provides certain goods and services to customers on commercial credit terms. AFF may need to handle personal information about customer credit worthiness in connection with those arrangements ("**credit-related personal information**"). Note that other sections of this policy are also relevant to credit-related personal information including dealing with access, correction, complaints, cross-border disclosures of personal information and how AFF collects and holds personal information. Further AFF may be subject to further obligations under the Privacy Laws, and this policy is not intended to limit or exclude those obligations.

10.3 If a customer applies for customer credit with AFF, AFF may require that the directors of the customer provide a personal guarantee. Where an individual is guaranteeing the obligations of a credit applicant, we may request a credit report about them from a credit reporting body ("**CRB**"). We use these reports to assess the application and ability to repay credit. To obtain these reports, AFF will disclose credit related personal information so that the CRB can accurately identify the individual.

Collection of Credit Related Personal Information

10.4 We may, to the extent permitted under the Privacy Law collect, hold and disclose any types of credit-related personal information about a person, including:

- Name, sex, date of birth, driver's licence number, employer name and three most recent addresses
- The fact that the person has applied for credit and the amount and type of credit limit
- Confirmation of previous information requests to Credit Reporting Bodies (CRBs) made by other credit providers, mortgage insurers and trade insurers
- Details of the person's credit providers
- Start and end dates of credit arrangements and certain terms and conditions of those arrangements
- Permitted payment default information, including information about related payment arrangements and subsequent repayment
- Information about serious credit infringements (e.g. fraud)
- Information about adverse court judgments
- Publicly available information about the person's credit worthiness
- Certain insolvency information from the national personal insolvency index
- Any credit score or credit risk assessment indicating a CRBs or credit provider's analysis of your eligibility for credit.

Use and Disclosure of Credit Related Personal Information

10.5 Where we have collected credit-related information about an individual from a CRB, we may use that information to produce our own assessments and ratings in respect of the relevant customer or prospective guarantor's credit worthiness.

10.6 The CRBs which we could use include (but are not limited to):

CRB	Website	Telephone
Equifax Australia Information Services & Solutions Pty Ltd	www.equifax.com.au	13 83 32
Illion Australia Pty Ltd	www.illion.com.au	13 23 33 or +61 3 9828 3200
Creditorwatch Pty Ltd	www.creditowatch.com.au	1300 501 312

10.7 AFF may exchange credit-related personal information with CRBs as may be permitted under the Privacy Law to:

- Assist CRBs to maintain information about an individual to provide to other credit providers in order for credit assessments to be undertaken
- Assess a credit application made by an individual or an application to be a guarantor
- Manage credit

- Create assessments and ratings of credit worthiness
- Seek information about your credit history (**Information Request**).

10.8 In relation to Information Requests, these will appear on your credit report and may be used and disclosed by the CRB (and us) to assess your credit worthiness, including when you make subsequent applications for credit, whether that is with us or another financial provider. Information Requests on your credit report have the potential to affect your credit score depending on the amount and type of credit you are applying for, frequency of Information Requests appearing on your credit report and your credit history.

10.9 By providing personal information in connection with a credit application, you consent to this use and disclosure of your credit-related personal information. Notwithstanding this, you acknowledge that your consent to the disclosure being made by us to the CRB is not required. The CRB may use your credit-related personal information to assess your credit worthiness and in reports it generates for credit providers.

10.10 For up-to-date contact details for the abovementioned CRBs, or to obtain a copy of their privacy policies and credit reporting policies, please visit the website of the relevant CRB. Sometimes your credit-related personal information will be used by CRBs for the purposes of 'pre-screening' credit offers on the request of other credit providers. You can contact the CRB at any time to request that your credit-related personal information is not used in this way.

10.11 If you fail to meet your payment obligations in relation to any consumer credit or if you commit a serious credit infringement, that may entitle us to disclose this to a CRB.

10.12 Under the Privacy Law, an individual has the right to request CRBs not to:

- Use their credit-related personal information to determine their eligibility to receive direct marketing from credit providers
- Use or disclose their credit-related personal information, if they have been or are likely to be a victim of fraud.

11. ARE "COOKIES" USED ON THE WEBSITE

11.1 "Cookies" are small pieces of information that are placed on a web user's hard drive, that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns. Cookies may be used on our website to monitor web traffic, for example the time of visit, pages visited and some system information about the type of computer being used. We use this information to enhance the content and services offered on our website and as further set out in this section.

11.2 We may use cookies to provide an individual with better service.

11.3 Cookies can make the website more useful by storing information about that person's preferences for a particular site.

11.4 The use of cookies is an industry standard, and many major websites use them to provide useful features for their customers.

11.5 Cookies in and of themselves do not necessarily personally identify users, although they do identify a user's computer. Most browsers are initially set to accept cookies.

11.6 If an individual prefers, they can set their browser to refuse cookies by following the instructions and using the options on their relevant browser. However, if they do so they may not be able to take full advantage of the functionality of the AFF site.

12. DIRECT MARKETING

12.1 By subscribing to our email communications, or otherwise providing us with your email address and/or telephone number, you consent to us using their personal information for sending them information, including promotional material, about us or our products and services, as well as the products and services of our related entities and third parties, now and in the future. You also consent to us sending you such information by means of direct mail, email, SMS and MMS messages

12.2 If you do not want to receive marketing information from us, they can unsubscribe in any of the following ways:

- clicking on the 'Unsubscribe' or subscription preferences link in a direct marketing email that you have received from us
- contacting us using the contact details specified in paragraph 15.3.

13. HOW DOES AN INDIVIDUAL ACCESS AND UPDATE THEIR PERSONAL INFORMATION

13.1 An individual can ask us for access to the personal information, including health information, we hold about them.

13.2 They can also ask us to update or change any personal information we hold about them, if that information is wrong, missing parts or out of date.

13.3 They can also ask us to delete their personal information, which we will do unless we are legally required or otherwise permitted to continue storing their information.

13.4 Depending on the nature of the request, we may charge for providing access to this information, however such charge will not be excessive. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access personal information, we will provide you with reasons for the refusal where we are required by law to give those reasons.

13.5 We take reasonable steps to ensure that any personal information we collect and use is accurate, complete and up-to-date. To assist us in this, an individual may need to provide true, accurate, current and complete information about themselves as requested, and properly update the information provided to us to keep it true, accurate, current and complete.

13.6 An individual can access or correct some of their personal information by contacting us in the ways specified in paragraph 15.3.

13.7 It would assist us to ensure we properly understand your request, and allow us to respond more promptly, if requests are made in writing and include as much detail as possible.

14. HOW DO PEOPLE MAKE COMPLAINTS?

14.1 We take concerns about an individual's personal information seriously.

14.2 If an individual is an employee, director, officer, contractor, labour hire, volunteer or trainee of AFF, please direct any concerns about privacy or the use or collection of their personal information by AFF, to hr@australianfoodandfibre.com.au or by calling us on (02) 6752 5795.

14.3 If an individual is a customer or someone who has come into contact with us and has any concerns about privacy or the use or collection of their personal information by AFF, please contact us at hr@australianfoodandfibre.com.au.

We will respond as quickly as possible and handle all complaints in a way that is fair and consistent. If an individual is not satisfied with our response, they can make a formal complaint with the privacy regulator.

15. FURTHER INFORMATION

15.1 AFF reserves the right to update this policy from time to time and it will communicate any updates, including by posting them on our website.

15.2 In so far as this policy imposes any obligations on AFF, those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees, they are discretionary in nature and are also not intended to be contractual.

15.3 If there are any queries about this policy, please contact HR at hr@australianfoodandfibre.com.au

16. REVIEW DETAILS

16.1 This policy was adopted by AFF on 1 May 2020.

16.2 This policy was last updated on 18 December 2025.

16.3 This policy is next to be updated on 3 March 2027.