



AUSTRALIAN ORGANIC LTD
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AUSTRALIAN ORGANIC LTD

PRIVACY POLICY





1. Date

1.1 This Privacy Policy was last updated on 31 December 2014.

2. Application and Scope

2.1 This Privacy Policy applies to all parties or persons who may come into contact with Australian Organic Ltd and who supply us with personal information in the course of such contact.

2.2 In addition to this Privacy Policy, there may be additional privacy notices and terms relevant to you depending on the nature of your dealings with us.

2.3 This Privacy Policy does not apply to our employees in their capacity as employees. Employees have a separate policy relevant to them specifically.

3. Purpose

3.1 We, Australian Organic Ltd, recognise the application of the Australian Privacy Principles to our business and this Privacy Policy is drafted in accordance with those principles.

3.2 We, Australian Organic Ltd, are committed to the compliance with privacy laws which apply to our business and which set out standards for the management of personal information collected in the course of that business.

3.3 This Privacy Policy outlines our practices regarding the management of personal information. Specifically, it addresses:

- the kinds of personal information we collect and hold;
- how we collect and hold personal information;
- the purposes for which we collect, hold, use and disclose personal information;
- your right, as a provider of personal information, to access and seek correction of it;
- the avenues available to you should you wish to complain about privacy matters; and
- how we share personal information overseas.

3.4 This policy applies to all kinds of personal information received by us, except those specifically excluded in this Privacy Policy.

4. The kind of personal information we collect and hold

4.1 We will only collect personal information which is reasonably necessary for, or directly related to, the activities of and incidental to our business.

- 4.2 Any personal information we collect from you will only be of the following kind:
- personal details including your name, addresses, telephone or fax numbers, email addresses, date of birth, details of any relevant organic certifications, date of birth and gender;
 - at your election only, credit card details including card type, name on the card, number, security code and amount authorised to be debited from any such credit card;
 - if you are or become a member of Australian Organic Ltd, your membership number;
 - information related to whether you have previously been involved with Australian Organic Ltd or have taken up some of our other offers or programs or memberships, or have purchased products from us;
 - any rewards or redemption details applicable to any membership you may hold or commence;
 - whether you have a connection with others whose personal information we may collect or hold, such as friends or family members who may be linked to a membership of yours;
 - what, how and when you buy product that may be on sale from time to time by us, or which you have expressed interest in buying from us; and
 - your stated or likely preferences as to any information, promotions or other form of contact you wish to receive from us.
- 4.3 Depending on the nature of your engagement with us, from time to time we may need to collect health information from you. Such information will only be requested and will only be used to provide you with any required services or for the management of any health-related issues which may arise from your connection with us.
- 4.4 Financial or other bank-related information, such as credit card details, will only be collected and held via our secure financial systems and will be destroyed upon the conclusion of your dealings with us.

5. Disclosure of your name

- 5.1 You generally have the option of anonymity or using a pseudonym when dealing with us, depending on the nature of your dealings. However, this is not available to you where it would be impractical (for example when you shop online with us) or where the law or a court order provides otherwise.

6. How we collect and hold personal information

Collection of personal information – general

- 6.1 When we collect personal information about you, we do so by making a record of it. We do this when:
- you register with us, for example to become a member or otherwise receive information from us;
 - you communicate with us online and provide us with any personal details in doing so;

- you participate in our promotions, competitions, testimonials, surveys and focus groups; or
- you deal with us in any other way which involves a need for personal information to be provided to us, such as when you bring a claim against us.

6.2 We will only collect personal information about you by lawful and fair means.

6.3 Most of the personal information we collect and hold about you is from your direct dealings with us. However, we may sometimes collect your personal information other than from you directly; for example from other suppliers who, in common with us, have a relationship with you. We may also collect personal information about you by accessing data from other sources and then analysing that data together with the information we already hold about you; this will be done solely in order to learn more about your likely preferences and interests.

Collection of personal information – cookies

6.4 When you visit our websites, social media pages or mobile applications or click on our advertisements on the online media of other companies, we may collect information about you using technology which is not apparent or obvious to you, for example, “cookies”.

6.5 Cookies are small pieces of information captured when your device is used to access online content. Cookies are stored in your device by the person who arranges for the cookie to be set, which may be the provider of the online content or a third party.

6.6 Cookies may be arranged by us or by others under an arrangement with us, such as companies whose business it is to analyse information. We may also access information from cookies set by others.

6.7 We allow cookies to be used for three reasons:

- Session cookies are used when you visit our online content. These enable your device to move from page to page without having to log in repeatedly, thus they generally improve your browsing experience.
- Permanent cookies are used to better inform us how the content your device visits may be presented to you. These cookies can store your preferences for a particular site, so they will be remembered when the site is visited again.
- Persistent and other kinds of permanent cookies are set and, along with third party cookies we access information from, assist in compiling and analysing the types of online content you visit and your interaction with that content. This assists us to assess what promotions to make to you, when and how. It also assists us to measure the effectiveness of our promotions.

- 6.8 You can control the extent to which your device allows cookies to be set on it. You can do this by changing the settings on the software your device uses to access the internet (your browser software). For example, depending on which browser your device uses, you may be able to disable third party cookies.
- 6.9 For further information about cookies, please visit these links:
- [Stay smart online – all about cookies and your privacy](#)
 - [Your online choices](#)
 - [Privacy Commissioner Fact Sheet on online behavioural advertising.](#)

Holding of personal information

- 6.10 Personal information we hold is generally stored in computer systems. These may be operated by us or by our service providers.
- 6.11 In all cases, we have rigorous information security requirements aimed at eliminating the risk of unauthorised access to, and loss, misuse or wrongful alteration of, personal information.
- 6.12 We will take reasonable steps to ensure that any personal information we hold is accurate, up-to-date and complete.

7. Why we collect, hold, use and disclose personal information

- 7.1 When we collect, hold and use your personal information, we do so primarily to promote our industry and services, from time to time to sell any products we have available for purchase, and to improve on the range of our offerings. For example:
- to learn of your likely preferences so that we may promote our goods and services to you in a way which may be of most interest or benefit to you; and
 - to assist in investigating any complaints and enquiries you may have.
- 7.2 We disclose personal information we collect for purposes which are incidental to the sale and promotion of our industry, services and products to you. For example, we may disclose your personal information within our group, to service providers who assist us in our day-to-day business operations, and/or as part of buying or selling other businesses.
- 7.3 We may collect, hold, use and disclose your personal information for other purposes which are within reasonable expectations or where permitted by law.
- 7.4 When marketing to you, your personal information is only ever used or disclosed for Australian Organic Ltd's own purposes.
- 7.5 You may opt out of our direct marketing to you. Our marketing materials will tell you how to do this.

7.6 We may de-identify your personal information. We may do this for use and disclosure of the anonymous data (for example, company statistical reports) to determine preferences and shopping patterns.

8. How you can enquire about, access and correct your personal information

8.1 We will provide you with access to any of your personal information we hold (except in limited circumstances recognised by law).

8.2 If you wish to access your personal information or have an enquiry about privacy, please contact Trent Sleeman, General Counsel

- by email to trent.sleeman@austorganic.com;
- by telephone on 07 3350 5706;
- by writing to us at PO Box 810, Nundah Qld 4012

8.3 Before we provide you with access to your personal information we may require some proof of identity.

8.4 We may charge a reasonable fee for giving access to your personal information if your request requires substantial effort on our part. Any such fee will be disclosed to you before the work required to comply with your request is undertaken.

8.5 If you need to correct your personal information, please contact us using one of the above methods.

9. Complaints about our management of personal information

9.1 If you wish to complain about a breach of the privacy rules or legislation that bind us, you may contact us using one of the above methods. We may ask you to put your complaint in writing and to provide details to substantiate it.

9.2 We may discuss your complaint with our personnel and our service providers and others as appropriate.

9.3 We will investigate the matter and attempt to resolve it in a timely way. We will inform you in writing about the outcome of the investigation.

9.4 If we do not resolve your complaint to your satisfaction and no other complaint resolution procedures are agreed or required by law, we will inform you that your complaint may be referred to the Office of the Privacy Commissioner for further investigation and we will provide you with the Office's contact details.

10. Our sharing of your personal information overseas

10.1 From time to time your personal information may be required to be shared overseas. For example:

- Where we have made a business decision to store our data with a trusted service provider who is in the business of providing data storage and processing services. Examples are those who store and process our email and mobile application data. These services commonly involve diverse geographic locations which change from time to time for reasons which include data protection and processing efficiency. Where these services are used by us, it is generally not practical for us to notify you of which country your personal information may be located in; if it is practical and easily communicated, you will be notified accordingly.
- Where marketing information is necessary to be disseminated between Australian Organic Ltd and any offshore company we may acquire in the future, or any employees or agents of Australian Organic Ltd who may be stationed or temporarily overseas.
- When anything we provide you or supply to you necessarily involves overseas disclosures.
- Where you are involved in legal or other issues concerning a product, information or services provided by us in the course of managing such issues.

10.2 It is our policy to require all of our overseas sharing of personal information to be done in a way which requires observance of strict privacy and security standards, both during transit and at the overseas destination. We will endeavour as much as is reasonably practicable to ensure that the overseas recipient of the information does not deal with the information in a way that is contrary to the Australian Privacy Principles.

11. Further information

11.1 Copies of this Privacy Policy will be made available to any person upon request, including in a different language if reasonably practicable in the circumstances as soon as is reasonably practicable.

11.2 More information about privacy law and privacy principles is available from the Information Privacy Commissioner: www.oaic.gov.au.