

## PRIVACY POLICY

### 1 Introduction

Ricegrowers Singapore Pte. Ltd. (“**Ricegrowers**”) together with its associated entities and complementary businesses (collectively “**SunRice Group**”) is committed to fulfilling its obligations under the Personal Data Protection Act (No. 26 of 2012) of Singapore (the “**PDPA**”).

This policy sets out the standards, rights and obligations of parties in relation to the collection, use, disclosure and/or processing of Personal Information by Ricegrowers and access and correction rights of individuals in relation to their Personal Information.

A person who collects Personal Information on behalf of Ricegrowers must comply with this policy and the requirements of the PDPA. Where relevant, they must also comply with the Privacy Policy and requirements of the SunRice Group found at <https://www.sunrice.com.au/corporate/statements/privacy-policy/>

### 2 Scope

- 2.1 This policy describes the way that the Ricegrowers collects, stores, uses and discloses individuals’ Personal Information. Except as set out below, any Personal Information collected by Ricegrowers is covered by this policy.

### 3 Definitions

**Personal Information** means any data, whether true or false, which can be related to a specific identifiable individual, whether such individual is identifiable from the data itself, or from other information which Ricegrowers has or is likely to have access to.

**Sensitive Information** includes:

- (a) Personal Information about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices and criminal record; and
- (b) health information about an individual.

### 4 Collection of Personal Information

- 4.1 The kinds of Personal Information typically collected by Ricegrowers include names, job titles and contact details of individuals and, in the case of applicants for employment, qualifications, work experience, competencies and relevant health information.
- 4.2 Ricegrowers may collect Personal Information from a variety of sources, including (but not limited to) from individuals, recruitment agencies, contractors and business partners. Ricegrowers may also collect Personal Information when an individual requests or acquires a product or service from the SunRice Group, provides a product or service to the SunRice Group, completes a survey or questionnaire, or when they communicate with the SunRice Group by e-mail, telephone or in writing.
- 4.3 If an individual does not or is not able to provide Ricegrowers with the requested Personal Information, Ricegrowers or the SunRice Group may not be able to provide that individual with the information, goods or services which the individual has requested.
- 4.4 Ricegrowers will hold Personal Information in physical and/or electronic form under generally accepted standards of technological and operational security.

- 4.5 Ricegrowers will:
- (a) only collect Personal Information if the information is reasonably necessary for one or more of its functions or activities;
  - (b) only collect Personal Information by reasonable and fair means, without intimidation or deception or unreasonable intrusion; and
  - (c) collect Personal Information about an individual only from the individual unless it is unreasonable or impracticable to do so.

4.6 Ricegrowers will collect, use and/or disclose Personal Information for the following purposes:

- (a) screening and assessing applicants for employment;
- (b) making contact with individuals and organisations the SunRice Group deals with or wants to deal with;
- (c) processing credit applications of and marketing, promoting and providing products and services to customers and prospective customers;
- (d) selecting and doing business with suppliers and other industry participants;
- (e) facilitating our interactions and business dealings with industry bodies;
- (f) appointing and doing business with contractors;
- (g) conducting investigations and proceedings and taking appropriate actions, in relation to any suspected or proven wrong-doings, unlawful conduct or malpractices;
- (h) cooperating with governmental, regulatory or other competent authorities, in any part of the world, in relation to any suspected or proven wrong-doings, unlawful conduct or malpractices
- (i) complying with applicable laws, regulations, industry codes and guidelines
- (j) accounting, auditing and reporting purposes;
- (k) in the case of employees of Ricegrowers, managing or terminating employment relationships (including in relation to employment-related benefits, compensation and payroll, performance appraisals, promotion, training and career development activities and job/formal references), development of company policies and programs;

4.7 The SunRice Group will only collect Sensitive Information if the relevant individual consents to the collection of that information or if that collection is required by law in specific circumstances such as matters of individual or public health or safety.

4.8 All individuals also have the right to withdraw their consent to the collection, use, disclosure and/or processing of their Personal Information or request for Ricegrowers to limit the processing and/or use of their Personal Information. To make such requests for withdrawal of consent, individuals may contact the Data Protection Officer who is also sometimes referred to as the Privacy Officer (contact details below).

4.9 Where an individual submits Personal Information relating to other individuals, he/she represents and warrants that he/she is authorised to provide such information to Ricegrowers and that he/she has obtained the relevant third party individual's consent to the collection, use, disclosure and/or processing of such information in accordance with this Privacy Policy.

## **5 Use and disclosure of Personal Information**

5.1 Ricegrowers will only use and disclose Personal Information in accordance with the PDPA. This may include where use or disclosure is required by law and where Ricegrowers has the individual's consent to the use or disclosure, for the purposes set out in Clause 4 above.

5.2 In the course of its business, Ricegrowers may be required to disclose Personal Information to other members of the SunRice Group, service providers, contractors and/or consultants in Singapore and Australia in order for Ricegrowers to provide individuals with the services, information or products requested.

## **6 Data accuracy and integrity**

- 6.1 Ricegrowers will take such steps as are reasonable in the circumstances to make sure that the Personal Information it collects, uses or discloses is accurate, complete and up-to-date and relevant to the purpose of use or disclosure.

## **7 Data security**

- 7.1 Ricegrowers will take reasonable steps to protect the Personal Information it holds from misuse, interference and loss and from unauthorised access, modification or disclosure.
- 7.2 Ricegrowers will take such steps that are reasonable in the circumstances to destroy or anonymise Personal Information (such as a job applicant's resume) if it is no longer needed by Ricegrowers for the purposes for which it was collected or any other business or legal purpose.

## **8 Access and correction**

- 8.1 If Ricegrowers holds Personal Information about an individual, it will, upon request by the individual and subject to the exceptions under the PDPA, provide the individual with access to their Personal Information, in the manner requested by the individual if it is reasonable and practicable to do so, within a reasonable period following the request.
- 8.2 If Ricegrowers holds Personal Information about an individual and Ricegrowers determines that the information, (having regard to the purpose for which it is held) is inaccurate, out-of-date, incomplete, irrelevant or misleading, or the individual asks that the information be corrected, Ricegrowers will take such steps (if any) that are reasonable in the circumstances to correct the information so that it is accurate, up-to-date, complete, relevant and not misleading.
- 8.3 If Ricegrowers has corrected information, as set out in 8.2 above, which Ricegrowers has previously disclosed to a third party, and the individual asks for that third party to be notified of the correction, Ricegrowers will take such steps (if any) as are reasonable in the circumstances to notify that third party unless it is impracticable or unlawful to do so.
- 8.4 If Ricegrowers refuses an individual's request for access to (including in the manner requested) or correction of Personal Information, as permitted by the PDPA, Ricegrowers will within a reasonable period provide written reasons for such refusal (except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to be expected to do so) and the mechanisms available to complain about the refusal.
- 8.5 If Ricegrowers has refused to correct Personal Information of an individual and the individual requests a statement be associated with the information to the effect that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, Ricegrowers will take such steps as are reasonable in the circumstances to do so in a way that is apparent to users of the information.

## **9 Anonymity and pseudonymity**

- 9.1 Unless Ricegrowers is required or authorised by or under a Singapore law or court/tribunal order or it is impracticable for Ricegrowers to do so, Ricegrowers will give individuals the option of not identifying themselves or of using a pseudonym when dealing with Ricegrowers in relation to a particular matter.

## **10 Communication and contact**

- 10.1 Ricegrowers will manage Personal Information in an open and transparent way. To this end, this Privacy Policy will be published internally and provided to anyone who asks for it. The policy will also be posted on the Sunrice Group website at <https://www.sunrice.com.au/media/681888/singapore-privacy-policy.pdf> in an appropriate form.
- 10.2 From time to time, Ricegrowers will review this Privacy Policy and incorporate amendments in the updated policy. The amended policy will be published on the SunRice Group website at <https://www.sunrice.com.au/media/681888/singapore-privacy-policy.pdf>.
- 10.3 Enquiries or concerns about matters relating to Ricegrowers' collection, use, disclosure and/or processing of personal data, including complaints about how Ricegrowers handles Personal Information and concerns that Ricegrowers has breached the PDPA, should be made in writing to the Data Protection Officer (contact details below). Ricegrowers will respond to all requests as quickly as possible.

**Contact the Ricegrowers' Data Protection Officer at:**

Attn: Data Protection Officer, Ricegrowers Singapore Pte. Ltd.

Phone: +65 6904 5633

Address: 47A/B Duxton Road Singapore 089511

Email: [privacy@sunrice.com.au](mailto:privacy@sunrice.com.au)