

PRIVACY POLICY

1 Introduction

Ricegrowers Limited, together with its associated entities and complementary businesses (collectively “SunRice Group”) is committed to fulfilling its obligations under the applicable data privacy laws, including Australia’s Privacy Act 1998 (Cth), as amended and the Australian Privacy Principles , data privacy obligations under Vietnamese law, including the Civil Code No. 91/2015/QH13 dated 24 November 2015, Law on Information Technology No. 67/2006/QH11 dated 29 June 2006 (as amended) and Law on Cyber Information Security No. 86/2015/QH13 dated 19 November 2015 (as amended) (together the “Privacy Laws”).

This policy sets out the standards, rights and obligations of parties in relation to the handling and maintenance of Personal Information by the SunRice Group, including the collection, storage, use, disclosure, quality and security of Personal Information and access and correction rights of individuals in relation to their Personal Information.

A person who collects Personal Information on behalf of the SunRice Group must comply with this policy and the requirements of the Privacy Laws.

2 Scope

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

2.2 This policy does not apply to the collection, storage, use and disclosure of Personal Information where:

- (a) the Personal Information is an Employee Record; and,
- (b) the collection, storage, use and/or disclosure of the Employee Record relates to the SunRice Group’s employment relationship with the employee.

3 Definitions

Employee Record means a record of Personal Information relating to the employment of an employee of the SunRice Group.

Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and,
- (b) whether the information or opinion is recorded in a material form or not.

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 the SunRice Group 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. SunRice may also collect banking details of growers purchasing seed from or selling paddy to SunRice.
- 4.2 The SunRice Group may collect Personal Information from a variety of sources, including (but not limited to) from individuals, advertisers, mailing lists, recruitment agencies, contractors and business partners. The SunRice Group may 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 (for example if they contact customer service to make a complaint or provide feedback).
- 4.3 If an individual does not or is not able to provide the SunRice Group with the requested Personal Information, the SunRice Group may not be able to provide that individual with the information, goods or services which the individual has requested.
- 4.4 The SunRice Group will hold Personal Information in documentary and/or electronic form under generally accepted standards of technological and operational security.
- 4.5 The SunRice Group 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 The purposes for which the SunRice Group will collect Personal Information include, but are not limited to:
- (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;
 - (d) selecting and doing business with suppliers, growers and other industry participants;
 - (e) facilitating our interactions and business dealings with industry bodies including (but not limited to) the Rice Marketing Board; and
 - (f) appointing and doing business with contractors.
- 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.

5 Use and disclosure of Personal Information

- 5.1 The SunRice Group will only use and disclose Personal Information in accordance with the Privacy Laws and the APPs. This may include where use or disclosure is required by law, where the SunRice Group has the individual's consent to the use or disclosure, for the purpose for which it was collected or for related purposes that the individual would reasonably expect the SunRice Group to use or disclose that information.
- 5.2 In the course of its business, the SunRice Group may be required to disclose Personal Information to its related companies, the Rice Marketing Board, service providers, contractors and/or consultants in Australia in order for the SunRice Group to provide individuals with the services, information or products requested.

6 Data quality and integrity

- 6.1 The SunRice Group 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 The SunRice Group 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 The SunRice Group will take such steps that are reasonable in the circumstances to destroy or de-identify Personal Information (such as a job applicant's resume) if it is no longer needed by the SunRice Group, is not contained in a record owned or deemed by applicable regulation to be owned by a government body and is not required to be retained by or under an Australian law or court/tribunal order.

8 Access and correction

- 8.1 If the SunRice Group holds Personal Information about an individual, it will, upon request by the individual and subject to the exceptions under the Privacy Laws, 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 the SunRice Group holds Personal Information about an individual and the SunRice Group 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, the SunRice Group 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 the SunRice Group has corrected information, as set out in 8.2 above, which the SunRice Group has previously disclosed to a third party, and the individual asks for that third party to be notified of the correction, the SunRice Group 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 the SunRice Group refuses an individual's request for access to (including in the manner requested) or correction of Personal Information, as permitted by the Privacy Laws, the SunRice Group 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 the SunRice Group has refused to correct Personal Information of an individual and the individual requests a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading be associated with

the information, the SunRice Group 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 the SunRice Group is required or authorised by or under an applicable law or court/tribunal order or it is impracticable for the SunRice Group to do so, the SunRice Group will give individuals the option of not identifying themselves or of using a pseudonym when dealing with the SunRice Group in relation to a particular matter.

10 Communication and contact

- 10.1 The SunRice Group 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 in an appropriate form.
- 10.2 From time to time, the SunRice Group will review this Privacy Policy and incorporate amendments in the updated policy. The amended policy will be published on the SunRice Group website.
- 10.3 Enquiries or concerns about privacy matters, including complaints about how the SunRice Group handles Personal Information and concerns that the SunRice Group has breached the Privacy Laws, should be made in writing to the Privacy Officer (contact details below). The SunRice Group will respond to all requests as quickly as possible.

Contact the SunRice Group's Privacy Officer at:

Attn: Privacy Officer, Ricegrowers Limited
Phone: 02 9268 2640
Address: Locked Bag 2, Leeton NSW 2705
Email: privacy@sunrice.com.au