



Olam Australia

Privacy Policy

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Version: 1



1. Commitment to Privacy

The Olam Australia Group of Companies (“**Olam Australia**”), understand the importance of privacy issues and are committed to ensuring your privacy is protected.

In this Privacy Policy, the expressions “we”, “us” and “our” are references to Olam Australia.

We may, from time to time and without prior notice, update this Privacy Policy to take account of changes to our business operations, information handling practices and/or to Australian privacy laws. We will post any updated Privacy Policy on our websites at <http://olamgroup.com/locations/australia/>, <http://gcportal.gcotton.com.au>, <http://www.mttysonseeds.com.au/> and <http://olamharvest.com.au/>. Any updated Privacy Policy that we post will apply only to the personal information we collect after we have posted that updated Privacy Policy. Your use of our websites constitutes your consent to the terms of the revised Privacy Policy. For this reason, it is important to review this Privacy Policy regularly.

This Privacy Policy was last updated in April 2018.

2. Scope of Privacy Policy

This Privacy Policy identifies how we manage the personal information we collect, use, hold and disclose, whether through our websites or other dealings with you, and how to contact us if you have any queries.

‘Personal information’ is information we hold about you where your identity is either clear or can be reasonably determined. The type of personal information held by Olam Australia will depend on how you interact with us and may include your name, contact details, employment details, job applications and banking information.

‘Sensitive information’ is a particular type of personal information and includes for example information about an individual’s health, racial or ethnic origins, membership of political, professional or trade associations and religious beliefs.

We are bound by the *Privacy Act 1988* (Cth) (“**Act**”) including the Australian Privacy Principles (“**APPs**”) and any amendments made to the Act. Should there be any inconsistency with this Policy and the Act, this Policy shall be interpreted to give effect to and comply with the Act.

If you would like further information about your rights to privacy, including access to the Act and APPs, please visit the Australian Information Commissioner’s website at <http://www.oaic.gov.au/>.



3. Information we collect

Where possible, we collect your personal information directly from you or your authorised representative and only to the extent necessary to undertake business with you or to carry out our internal administrative operations or meet relevant regulatory requirements.

If we receive your personal information from another party, we will contact you (if we have sufficient information to do so and it is reasonable in the circumstances).

We may collect information from you via telephone, email, fax, recruitment agencies, labour hire companies, contractors, our websites, in person or in writing. We will collect personal information from you by lawful and fair means. If you choose not to provide your personal information when requested, we may not be able to undertake business with you or provide you with information you have requested.

If we receive unsolicited personal information about or relating to you and we determine that such information could have been collected in the same manner if we had solicited the information, then we will treat it in the same way as solicited personal information and in accordance with the Act. Otherwise if we determine that such information could not have been collected in the same manner as solicited personal information, we will, if it is lawful and reasonable to do so, destroy the information or de-identify the information.

4. Use of personal information

We use personal information you provide only for purposes consistent with the reason you provided it, for a directly related purpose or with your express or implied consent. We may also use your personal information where required or permitted by law.

We may require your personal information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping
- We may use the information to improve our products and services
- We may periodically send promotional emails to you, using the email address which you have provided, about new products, press releases, special offers or other information pertaining to our business which we think you may find interesting
- From time to time, we may also use your information to contact you for market research purposes.

We may contact you by email, phone, fax or mail. We may use the information to customise our websites according to your interests.

We do not share your personal information with other organisations unless you give us consent or where sharing is otherwise required or permitted by law or where this is necessary on a temporary basis to enable our contractors to perform specific functions.



5. Disclosure of personal information

We may disclose personal information to other parties as long as the purpose for sharing is related to the reason the personal information was originally collected or in those circumstances permitted by the APPs.

We may disclose personal information that we collect:

- To our related entities, contractors or agents
- To others that you have been informed of at the time any personal information is collected from you
- To our business associates and others for purposes directly related to the purpose for which the personal information was collected (including organisations involved in the sale and supply of commodities including cotton, almonds, pulses, cocoa and dairy)
- To our professional advisors
- To organisations that acquire all or part of our assets or business
- To government and regulatory authorities
- To provide brokers and agents with relevant details.

6. Storage of personal information

Where we store your personal information depends largely on the purpose for which it was collected. This may include (but is not limited to):

- Our internal customer relationship management system
- Our internal electronic database
- Our hard copy records in our office
- Our hard copy and/or electronic records in secure archiving storage facilities.

We only retain your personal information for as long as is necessary for the purposes for which it was collected and we are required to keep it to comply with any laws. We will take such steps as are reasonable in the circumstances to destroy or de-identify personal information which we no longer need. These measures may vary depending on the personal information held.

We take all reasonable steps to ensure that paper and electronic records containing personal information are stored in facilities that are only accessible by people who have a genuine need to know.



7. Use of our websites

By using our websites, you acknowledge that you've read and understood this Privacy Policy. Please note that if you are accessing any of our websites, you are consenting to the collection, use and disclosure of your personal information on the terms of this Policy.

The personal information we collect depends on how you use our websites. For example, if you sign up to receive email alerts from us, we collect your email address and any related information you provide. Should we ask you to provide certain information by which you can be identified when using our websites, then you can be assured that it will only be used in accordance with this Privacy Policy.

When you browse any of our websites, our Internet Service Provider may collect information using 'cookies'. 'Cookies' assist us to store information on how visitors to our websites use them and the pages that may be of most interest. Attached is a list of cookies we collect and what information they store, used on our Australian hosted websites.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. We use cookies for security measures and primarily for user authentication. We may also use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our websites in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Cookies help us provide you with better websites by enabling us to monitor which pages you find useful and which you do not. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of our websites. Access to this information is restricted within the Olam Group and any consultants who are bound to respect the privacy of the information.

We may collect non-personal information from you such as browser type, operating system and web pages visited to help us manage our websites. We do not disclose or publish information which identifies browser activity without consent.

We reserve the right to gather information about any attempted access to the Olam Australia websites which raises security issues and may make required disclosures to relevant authorities.

Our websites may contain links to third party websites. As these websites are not under the control of Olam Australia, we are not responsible for the content or privacy practices of these websites nor is any member of the global Olam Group.



8. Emails and accounts

Email addresses are not added to mailing lists and details will not be disclosed to third parties without consent or unless required by law. Authorised personnel may monitor email messages for system maintenance purposes.

9. Security measures

We are committed to ensuring that your information is secure. On receipt of your personal information, we will take reasonable steps to preserve the security of your personal information on our systems and to prevent unauthorised access to or disclosure of your personal information.

We regularly monitor our systems holding personal information and employ appropriate technical, administrative and physical procedures to protect personal information from unauthorised disclosure, loss, misuse or alteration. We limit access to personal information to individuals with a business need consistent with the reason the information was provided.

We do not guarantee that unauthorised access to your personal information will not occur, either during transmission of that information to us or after we receive that information.

10. Notifiable Data Breaches

If there has been or there are reasonable grounds to believe there has been unauthorised access, modifications, disclosure or misuse of your personal information held by us (“**Data Breach**”) and we consider, acting reasonably, there is a real risk of serious harm to you as a result of the Data Breach, we will notify both you and OAIC as soon as practicable after becoming aware of the Data Breach. If necessary we will notify other third parties such as credit card companies, law enforcement or regulatory bodies.

We will provide both you and OAIC with a written statement including among other things our details, the nature of the Data Breach, our response(s) to the Data Breach and legal implications of the Data Breach. If for some reason it is impractical to notify all affected individuals, Olam Australia will publish a statement on our websites and publicise the content of the statement.

The response or action we take to address the Data Breach will depend on the nature of the breach and any response or action taken will be conducted in accordance with our internal procedures governing Data Breaches. We will take whatever steps are possible to immediately contain the Data Breach and mitigate the harm you may suffer (for example by stopping the unauthorised practice, recovering the records, shutting down the system that was breached).



Examples of the types of data breaches that may have the potential to cause serious harm include when:

- A device containing an individual's personal information is lost or stolen
- A database containing personal information is hacked
- Personal information is mistakenly provided to the wrong person.

11. Transfer of personal information overseas

We use information systems and servers hosted by third parties that store personal information offshore. We will only do so in compliance with all applicable Australian data protection and privacy laws. Information will be stored in countries including but not limited to Australia and Singapore. We take reasonable steps to ensure that offshore service providers comply with the Australian Privacy Principles.

12. Accessing and correcting your personal information

We review, on a regular and ongoing basis, our collection and storage practices to ascertain how improvements to accuracy can be achieved.

You can request access to your personal information held by us. We may ask that you put the request in writing and may also require some verified proof of identification before releasing or correcting any personal information. We will deal with your request in a reasonable time – usually within 30 days.

We take the accuracy of your personal information seriously. If you are aware that the information we hold relating to you is inaccurate, incorrect or out-of-date, please contact our Privacy Officer (details are listed in paragraph 13 below).

13. Complaints

Maintaining the privacy of your personal information is of paramount importance to us as it helps us foster confidence, goodwill and stronger relationships with you. If at any time, you have a complaint about the way in which we have dealt with your personal information or a privacy problem or query, please contact our Privacy Officer at:

Privacy Officer
Olam Australia
55 Wyandra Street
Newstead QLD 4006
Telephone: (07) 3250 3300
Fax: (07) 3852 1681
Email: australia@olamnet.com



14. Handling your complaint

We will acknowledge your request within 10 business days of our receipt. If you do not receive a satisfactory response from us within 10 business days, you may refer your query, problem or complaint to the Office of the Australian Information Commissioner via the contact details listed at <http://www.oaic.gov.au/about-us/contact-us-page>.



Website Name	Website Address	Cookie Name	Cookie Distributor	Cookie Description
Olam Harvest	http://olamharvest.com.au/	NID	Olam Harvest	This is a unique identifier used by Google applications to store user preferences
Olam Harvest	http://olamharvest.com.au/	oharvest_temp	Olam Harvest	Used to authenticate a user as they login to the website to ensure security details have not been tampered with.
Olam Harvest	http://olamharvest.com.au/	wfvt_	WordFence Plugin	Used to collate pages and actions conducted by a user while on the website. This cookie expires hourly.
Olam Harvest	http://olamharvest.com.au/	wfwaf-authcookie-	WordFence Plugin	Authenticates users as they login. This cookie expires daily
Olam Harvest	http://olamharvest.com.au/	wordfence_verifiedHuman	WordFence Plugin	Distiguish Human acitvity from Bot activity. This cookie expires daily.
Olam Harvest	http://olamharvest.com.au/	wordpress_	WordPress	Stores authentication details. Limited to Dashboard and Admin section of the website and doesn not affect wider user base.
Olam Harvest	http://olamharvest.com.au/	wordpress_logged_in_	WordPress	Indicates when you're logged in, and who you are, for most interface use.
Olam Harvest	http://olamharvest.com.au/	wordpress_test_cookie	WordPress	The cookie is used to check whether your web browser is set to allow, or reject cookies.
Olam Harvest	http://olamharvest.com.au/	wp-settings-	WordPress	This is used to customize your view of admin interface, and possibly also the main site interface
Olam Harvest	http://olamharvest.com.au/	wp-settings-time-	WordPress	This is used to customize your view of admin interface, and possibly also the main site interface
Mt Tyson Seeds	http://www.mttysonseeds.com.au/	NID	Olam Harvest	This is a unique identifier used by Google applications to store user preferences
Mt Tyson Seeds	http://www.mttysonseeds.com.au/	mttyson_temp	Olam Harvest	Used to authenticate a user as they login to the website to ensure security details have not been tampered with.
Mt Tyson Seeds	http://www.mttysonseeds.com.au/	wfvt_	WordFence Plugin	Used to collate pages and actions conducted by a user while on the website. This cookie expires hourly.
Mt Tyson Seeds	http://www.mttysonseeds.com.au/	wfwaf-authcookie-	WordFence Plugin	Authenticates users as they login. This cookie expires daily



Mt Tyson Seeds	http://www.mttysonseeds.com.au/	wordfence_verifiedHuman	WordFence Plugin	Distiguish Human acitvity from Bot activity. This cookie expires daily.
Mt Tyson Seeds	http://www.mttysonseeds.com.au/	wordpress_	WordPress	Stores authentication details. Limited to Dashboard and Admin section of the website and doesn not affect wider user base.
Mt Tyson Seeds	http://www.mttysonseeds.com.au/	wordpress_logged_in_	WordPress	Indicates when you're logged in, and who you are, for most interface use.
Mt Tyson Seeds	http://www.mttysonseeds.com.au/	wp-settings-	WordPress	This is used to customize your view of admin interface, and possibly also the main site interface
Mt Tyson Seeds	http://www.mttysonseeds.com.au/	wp-settings-time-	WordPress	This is used to customize your view of admin interface, and possibly also the main site interface
QC Grower Portal	http://qcportal.qcotton.com.au/	cotton	QC Portal	Indicates a user is logged into QC Grower Portal.
QC Grower Portal	http://qcportal.qcotton.com.au/	csrftoken	QC Portal	Authenticates form submissions to ensure users inputs have not been tampered with while interacting with our database.