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## PURPOSE

Co-operative Bulk Handling Limited (CBH) is committed to treating the personal information it collects in accordance with the Australian Privacy Principles outlined in the Privacy Act 1988 (Cth) (Privacy Act).

This Privacy Policy sets out how CBH handles personal information about you in a fair and responsible manner. It does not apply to personal information CBH collects that is exempt under the Privacy Act.

CBH may modify this Privacy Policy from time to time to reflect its current privacy practices.

A reference to "CBH" in this Privacy Policy means a reference to one or more members of the CBH Group which includes all of CBH's 100%-owned subsidiaries.

## PRINCIPLES

### ***What personal information does CBH collect and hold?***

The type of personal information CBH collects and holds will depend on how you interact with CBH. CBH may collect personal information about you which allows CBH to carry on its business and provide services to you, including:

- names, addresses, contact information, dates of birth, occupation, banking and financial information;
- type, amount and location of grain grown and where delivered to CBH;
- your grower number if you are a grower (either for the CBH Grower ID Portal (GRID) or the National Grower Register (NGR));
- products sold to you or purchased from you;
- vehicles registered in your name;
- business structuring details;
- interests, opinions and hobbies;
- technical information relating to your computer, tablet or mobile device including IP address, types of browser, operating system and devices, dates and time you visited/used CBH sites or applications, pages accessed, documents downloaded, and / or
- CBH may also collect and hold Credit Information.

Personal Information may be collected directly from you in various ways, for example as a response to a request for information made by CBH, as part of any forms you may need to submit to CBH, during the process of entering into an agreement with CBH for the purchase or sale of goods and services or using a range of tools such as Google Analytics, Google Firebase and Campaign Monitor. This information may include:

- (a) the location from which you have come to the site and the pages you have visited; and
- (b) technical data, which may include IP address, broad geographic location, the types of devices you are using to access the website, device attributes, browser type, language and operating system.

Where you deal with CBH using a number from the NGR, CBH may collect information about you from the NGR which is operated by National Grower Register Pty Ltd. CBH is obliged to deal with that information in accordance with the privacy policy of NGR.

You can obtain a copy of that policy from NGR at [www.ngr.com.au](http://www.ngr.com.au) .

### ***What sensitive information does CBH collect and hold?***

In some circumstances CBH may have to collect sensitive information (as defined in the Privacy Act), specifically health information related to individuals who have been involved in an accident or incident on CBH premises. CBH will only collect this sensitive information with the consent of the individual concerned and CBH will only retain that information as a record related to the accident or incident. With respect to sensitive information related to employees or potential employees CBH will only use the sensitive information contained in its employee records in a manner and for a purpose consistent with the employment or former employment (as the case may be) of the individual concerned.

## Collection Statements

### ***How does CBH use personal information?***

At or before the time CBH collects personal information, CBH will take reasonable steps to ensure that you are made aware of who CBH is, the purpose of the collection, the organisations to who CBH would usually disclose information as part of providing services to you, the fact that you are able to gain access to the information held about you and the main consequences for you if all or part of the information is not collected. See CBH Privacy Collection Statement

### ***When does CBH disclose personal information?***

CBH only discloses personal information in accordance with the purpose for which it was collected, as required or permitted by law or otherwise with your consent which may at times be implied from your dealings with CBH. In addition, where CBH discloses personal information to external service providers in order to accomplish a purpose for which information is collected, CBH will require any external service provider to maintain the confidentiality of that personal information and not share it further. For instance, if you transfer grain owned by you and held within CBH to a particular marketer CBH is entitled to assume that you will want CBH to notify that marketer that you have transferred an entitlement to a specified portion of grain.

CBH may also disclose personal information in the promotion and development of Australian agricultural resources either internally or through consultants. Generally, CBH will de-identify and aggregate any information provided to people or organisations external to CBH such that you cannot be identified.

## Disclosure to Overseas Recipients

In general, CBH does not provide any of your personal information to overseas recipients unless permitted by law. However, CBH may be required to disclose information to its related bodies corporate which are located overseas in jurisdictions currently including, but not limited in the future to, Japan, Switzerland and Hong Kong.

It is possible that you may also elect to transact with a foreign entity registered in and doing business in Australia. In those circumstances, where CBH provides information to that entity as expressly or impliedly authorised by you, it is possible that the information may be transmitted overseas. CBH is not able to specify the countries to which that information is transmitted, and you should check the privacy policy of any party with which you are transacting.

CBH may use cloud computing solutions or data storage located overseas, in which case information may be stored under the control of CBH on computer servers located outside of Australia, although it is CBH's preference to use organisations with servers located in Australia. Where this is not possible, it is predominantly located in the United States of America and Canada.

## Your rights under the EU GDPR

If you are a resident of the European Union (**EU**) or European Economic Area then under the EU General Data Protection Regulation (**GDPR**), as a data subject you have the right to:

- access your data;
- have your data deleted or corrected where it is inaccurate;
- object to your data being processed and to restrict processing;
- withdraw consent to having your data processed;
- have your data provided in a standard format so that it can be transferred elsewhere; and
- not be subject to a decision based solely on automated processing.

### **(Data Subject Rights)**

CBH has processes in place to deal with Data Subject Rights requests. Our actions and responsibilities will depend on whether we are the controller or processor of the personal data at issue. Depending on our role as either a controller or processor, the process for enabling Data Subject Rights may differ, and are always subject to applicable law. Please refer to the "*How do I access my personal information?*" section of this policy if you would like to make a Data Subject Rights request **OR** have a specific need for assistance with a Data Subject Rights request.

## **Credit Information**

Credit Information means personal information that may include identification information, repayment history information, the type and amount of commercial credit sought, default or payment information, information about any court proceedings or personal insolvency relating to the provision of credit, publicly available information about creditworthiness, Derived Information and Eligibility Information.

Eligibility Information means credit reporting information that CBH discloses to a credit reporting body or information that we may obtain or derive from information received from a credit reporting body about an individual's creditworthiness.

Derived Information means personal information that CBH may derive from credit reporting information that we receive from credit reporting bodies that has an impact on your creditworthiness.

### ***How does CBH manage my Credit Information?***

Through doing business with CBH we may collect your Credit Information in accordance with the Privacy Act, for various reasons or purposes, including, but not necessarily limited to:

- as part of any credit application submitted by you, for example as part of the Pre-Pay Advantage Application
- to conduct a commercial credit check to determine your credit eligibility
- when assessing an application to act as guarantor, and
- when managing the collection of repayments or payment defaults.

CBH may disclose your Credit Information as permitted by law, including to:

- a credit reporting body with whom it works, currently Veda Advantage Information Services & Solutions Ltd [www.veda.com.au](http://www.veda.com.au)
- debt collection agencies, and
- financial and legal advisors.

CBH does not disclose your credit information to third parties located overseas.

You can access your Credit Information, seek to correct your credit information or make a complaint as outlined in this Privacy Policy.

### ***How does CBH keep your personal information secure?***

Once CBH receives your personal information it takes reasonable steps to keep your personal information secure and protect it from unauthorised access, modification, disclosure, loss and misuse.

CBH implements both physical and technological security measures to protect personal information. Physical measures include secure storage and use of security passes to access the CBH office while technological security measures include firewalls, the use of encryption and passwords and restriction of access to personal information unless necessary for the uses outlined in this Privacy Policy.

CBH will take steps to notify you of a data breach involving your personal information, as required by the Privacy Act. Where a notification is required CBH will advise you, amongst other things, of the nature of the breach and the kind of personal information involved in the incident.

However, CBH cannot guarantee that any information that can be accessed or transmitted on the internet is entirely secure. Ultimately you are solely responsible for keeping your passwords and/or account information confidential and you should be careful and responsible whenever you are online.

CBH retains your personal information only for as long as necessary to fulfil the purposes for which the information was collected, as required by law or in accordance with CBH records management procedures.

### ***How do I access my personal information?***

If you believe that CBH has personal information relating to you, please send your request to:

**Post** Privacy Officer  
CBH Group  
Level 6, 240 St Georges Terrace  
Perth, Western Australia, 6000

**Telephone** (08) 9237 9600

**Email / Web** [privacy@cbh.com.au](mailto:privacy@cbh.com.au)

As part of that request you will have to provide your full name (and any aliases you may have). CBH will investigate whether it holds any relevant information on you, and if so, notify you of the types of information that it holds. CBH will endeavour to respond to you as quickly as is reasonably possible, but in any event will ensure that you have a response within 30 days of your request, including any reasons for refusing to allow access to all, or part, of the personal information.

CBH may be entitled to withhold all or some of the information from you where it considers that:

- to provide access would:
  - in the case of personal information, pose a serious and imminent threat to the life or health of any individual; or
  - in the case of health information, pose a serious threat to the life or health of any individual;
- to provide access would have an unreasonable impact upon the privacy of other individuals;
- the request for access is unreasonable or frivolous;
- the information relates to existing or anticipated legal proceedings between CBH and you and the information would not be accessible by the process of discovery in those proceedings;
- providing access would reveal CBH's intentions in relation to negotiations with you and would prejudice those negotiations;
- providing access would be unlawful, likely to prejudice an investigation of possible unlawful activity, or likely to interfere with the administration of the law or impact on related matters (for example, where an enforcement body has lawfully requested CBH do not disclose the information for national security reasons); or
- the provision of the information would reveal a commercially sensitive decision making process. In these circumstances CBH may provide an explanation for the commercially sensitive decision rather than direct access to the information.

## **Costs**

CBH will not charge you for making a request for access to personal information. However, CBH may, at its discretion, charge you for the reasonable costs incurred in providing you access to that information (for example, staff costs in searching for, locating and retrieving the information, copying and sending the information, etc).

### ***How do I correct personal information?***

If, following access to personal information stored by CBH, you consider that the information is incorrect, you may ask CBH to correct the information. CBH will respond to any such request within a reasonable time. If CBH refuses to amend the information stored it will provide you with the reasons for its refusal, unless it would be unreasonable to provide those details (for example, where providing reasons would prejudice an investigation of unlawful activity or enforcement action by an enforcement body).

### ***How do I make a complaint?***

If you are unhappy with the decision:

- to refuse access to personal information; or
- to refuse to correct the personal information,

You may advise CBH in writing and CBH will respond within a reasonable timeframe. If you are still unhappy with the decision you may make a complaint to the Australian Information Commissioner or to a recognised external dispute resolution scheme of which you are a member. Contact details for the Australian Information Commissioner are:

Office of the Australian Information Commissioner  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)  
Phone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## **Links**

The CBH website may contain links to other websites. These third-party websites may also collect personal information about you. CBH are not responsible for the privacy practices of other businesses or the content of websites that are linked to the CBH website. CBH advises you to read the privacy statements of every website accessed via the CBH website.