

PRIVACY POLICY

Introduction

This Policy describes the handling of personal information collected by the GrainCorp Group of Companies (GrainCorp) (1), including personal information collected by GrainCorp online at its website: www.graincorp.com.au

GrainCorp recognises the importance of and is committed to the protection of personal privacy. GrainCorp is bound by the National Privacy Principles (NPPs) as provided for in the Privacy Act 1998, which came into effect on 21 December 2001 to govern information collected from that date and prior collected information which is used from that date. This Policy has been developed as part of GrainCorp's ongoing commitment to the protection of the privacy of individuals with whom it deals.

The information in this Policy relates to GrainCorp's current privacy standards. GrainCorp may vary these standards from time to time. Any variation will be reflected in the Policy. GrainCorp encourages individuals to check its Policy from time to time to ensure they are aware of the most up to date privacy standards applying to the handling of their personal information.

Objectives

The objectives of this Policy are to:

- Establish a set of privacy standards to which GrainCorp will comply to protect the privacy of individuals whose personal information GrainCorp collects, uses, discloses, stores or handles;
- Demonstrate GrainCorp's ongoing commitment to protecting privacy and to address any privacy concerns individuals may have arising from its functions and activities;
- Describe the manner in which GrainCorp collects, uses, discloses, stores and handles personal information;
- Ensure that GrainCorp complies with its obligations under the Privacy Act 1988;
- Keep up to date and comply with any future developments in privacy protection.

GrainCorp's Functions and Activities and Privacy

The business of GrainCorp is described in detail in other documents such as the GrainCorp Annual Report. In summary, GrainCorp is involved in the provision of bulk grain storage and handling services and supply of quality grain and oilseeds and other products to two equally important customer groups-growers and buyers. GrainCorp operates a marketing division which offers a range of trading and contracting alternatives for cereals, oilseeds and pulses. Merchandise services for seed products, fertilisers and agricultural chemicals are also provided. In conducting its business GrainCorp carries out a range of activities including managing its commercial relationships with customers, performing administrative functions, promoting its products and services, building and maintaining business relationships and complying with legal requirements.

GrainCorp collects information from individuals (primarily, its customers) in order to conduct these various aspects of business functions and activities.

What personal information does GrainCorp collect?

GrainCorp collects a range of personal information about individuals who are its customers, prospective customers, contractors, suppliers, agents, service providers and employees, depending on the service to be accessed. This information may include (but is not limited to) information about name, contact details, financial status, credit history, transaction history, banking details, insurances or personal references.

GrainCorp may also collect other personal information such as banking details for the purpose of the National Grower Registration (NGR) and registration, site usage, email and server details in the case of GrainCorp website users.

Collection and storage of personal information

GrainCorp collects personal information from documents such as application or registration forms, supplementary forms, letters, e-mails or in telephone conversations. GrainCorp may also collect personal information through an individual's use of the GrainCorp website (see below "GrainCorp Internet Privacy Policy").

Personal information may be stored electronically or in paper files. Wherever possible GrainCorp collects personal information from the person concerned, but it may be necessary to obtain information about a person from other people as well. In those cases GrainCorp will take reasonable steps to ensure the person is made aware of that collection.

Disclosure of personal information

Where necessary for its business purposes, GrainCorp may disclose personal information to other organisations such as its service providers, bulk handling and marketing companies, other companies within the GrainCorp Group or banks. GrainCorp will require these organisations to adhere to strict privacy protection requirements and also seek privacy protection obligations in relation to information disclosed by GrainCorp in these circumstances.

GrainCorp may also need to disclose information by law, for statutory reporting purposes or in order to prevent breaches of the law. Details of these disclosures will be included in the privacy statements given by GrainCorp made in connection with grower deliveries and also in connection with associated financial and trading products.

Accuracy and security of information

GrainCorp will take all reasonable steps to ensure that:

- personal information collected, used and disclosed by it is correct, complete and up to date. Any inaccurate information will be corrected promptly when it is identified;
- personal information held in paper or electronic form is safe and secure and that it is protected from misuse, loss, unauthorised access, modification or disclosure; and
- personal information is only used by employees or disclosed to other organisations to the extent necessary for GrainCorp's business purposes.

Destruction and de-identification of personal information

GrainCorp will take all reasonable steps to de-identify or destroy personal information when it is no longer required for one of GrainCorp's business functions or activities or for legal requirements.

Access to personal information held about individuals and complaint process

Individuals have the right to request access to or correction of their personal information held by GrainCorp, or to make a complaint in relation to GrainCorp's handling of their personal information. For access requests, no lodgement fees will be charged. However, a fee may be charged by GrainCorp for the reasonable expenses incurred (such as search or photocopy costs) in providing the information requested.

GrainCorp has appointed its Administration Manager, GrainCorp Limited, Tower 1, Level 17, 201 Sussex Street, Darling Park, Sydney NSW 2000, as its Privacy Officer. Privacy-related complaints should be referred direct to the Privacy Officer. All reasonable endeavours will be made to resolve complaints within 30 days of their lodgement.

Compliance with this Policy

GrainCorp will implement this Policy through the use of proper procedures, staff training and audit provisions. Employees and contractors who handle personal information on behalf of GrainCorp are aware of the standards of this Policy and are required to uphold and protect individuals' privacy accordingly.

- (1) For the purpose of this Policy, GrainCorp means the GrainCorp group of related companies including:
- Graingrowers Association Limited (ABN 25 000 245 269, the ultimate parent entity)
 - GrainCorp Limited (ABN 60 057 186 035)
 - GrainCorp Services Limited (ABN 17 050 099 146)
 - GrainCorp Operations Limited (ABN 52 003 875 401)
 - GrainCorp Victoria Pty Limited (ABN 25 069 096 582)
 - Victoria Grain Services Limited (ABN 99 059 347 349)
 - Vicgrain Limited (ABN 69 069 291 532)
 - Vicgrain (Assets) Pty Limited (ABN 42 068 777 524)
 - Vicgrain (Finance) Pty Limited (ABN 72 069 750 447)
 - GrainCorp Ag Finance Limited (ABN 86 096 359 447)
 - GrainCorp National Pty Limited (ABN 92 096 359 474)
 - Grainco Australia Pty Limited (ABN 50 070 878 041)
 - Grainco Australia (Sub1) Pty Limited (ABN 64 097 573 549)
 - Globex International Pty Limited (ABN 36 073 105 656)
 - Containerlink Pty Limited (ABN 53 050 628 227)
 - Bulk Terminals Australia Pty Limited (ABN 100 751 102)
 - Austasia Grains Pty Limited (ABN 18 010 694 265)
 - Ausfarmers Pty Limited (ABN 052 348 973)
 - ACN 089 443 488 Pty Limited (ABN 46 089 443 498)
 - Maceast Pty Limited (ABN 85 065 134 661)
 - Australian Independent Cement Terminals Pty Limited (ABN 57 087 551 755)
 - Wilsonton Facilities Pty Limited (ABN 50 009 926 103)
 - Grainco Australia Seeds Pty Limited (ABN 56 092 220 936)
 - Marketlink (Aust) Pty Limited (ABN 50 092 220 909)
 - GrainCorp Barley Pool Pty Limited (ABN 106 600 006)

GRAINCORP INTERNET PRIVACY POLICY

The GrainCorp Internet Privacy Policy complements GrainCorp's general Privacy Policy (detailed above). In addition to these policies, GrainCorp employees, contractors and agents comply with the GrainCorp Computer Security Policy.

The GrainCorp server logs information about the use of GrainCorp's website: www.graincorp.com.au. GrainCorp may log this information by using cookies. Cookies are small files that a website writes to a user's hard drive when that user visits the website. Cookies cannot read information from a user's hard drive or read information from other cookies.

The type of information logged may include the following information captured from a user's browser:

- The type of browser and operating system used;
- The previous website the user visited;
- The user's server's IP address;
- Date and time of the user's visit;
- The address of the pages accessed;
- The documents downloaded.

Purposes for which personal information collected through the GrainCorp website may be used

Information about individuals obtained from their use of the GrainCorp website may be used for purposes of:

- delivering and improving the website and for the products and services provided by GrainCorp;
- providing users with access to certain features of the website, these features not being accessible without the user providing the information.

The information provided by users of the GrainCorp website may be used or disclosed for business purposes including:

- to administer and manage the commercial relationship between the user and GrainCorp
- to send e-mails or direct marketing material to the user, providing general information about products or services provided by GrainCorp or available from other persons nominated by GrainCorp, but only with the express consent of the user to do so, and
- to efficiently and effectively manage GrainCorp's business operations.

Security

GrainCorp takes the protection of information from growers, customers and transaction instructions seriously. Privacy protection is an essential component of GrainCorp's operational requirements and business integrity. Users of the GrainCorp website access secured sections of the website only. To uphold the privacy of website users' personal information, GrainCorp employs encryption technology for transmission of transactions using this medium.

Further Information

Further information relating to GrainCorp's General Privacy Policy or Internet Privacy Policy may be obtained from:

The Administration Manager
(Privacy Officer)
GrainCorp Limited
Tower 1, Level 17, 201 Sussex Street
Darling Park,
SYDNEY NSW 2000
Telephone: 02 9325 9100 Fax: 02 9325 9180
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