

Privacy and Credit Reporting Policy

This is the privacy and credit reporting policy of Spring Gully Foods Pty Limited ACN 007 654 211 (**Spring Gully Foods**).

The purpose of this policy is to ensure that any individual who provides information to Spring Gully Foods is protected under Australian law, in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**).

We seek to protect and maintain the privacy, accuracy and security of your personal information. We will comply with the Australian Privacy Principles (**APPs**) in the Privacy Act.

This policy also includes our credit reporting policy, it covers additional information on how we manage your credit information collected in connection with a credit application or director's guarantee. The handling of credit information is regulated by the Privacy (Credit Reporting) Code (**CR Code**) as well as the Privacy Act. Words defined in the Privacy Act have the same meaning when used in this policy.

Collection of information

(a) General

We may collect personal information about you such as:

1. your name, current address, previous address details;
2. date of birth and gender;
3. email addresses, telephone and or mobile numbers and fax number;
4. current and previous employment information; and
5. Your credit-related personal information (as described below).

We collect personal information from you when you use our website, complete our Application for Credit Account, enter into a director's guarantee, order goods from us or you otherwise provide it to us in the course of business. We do not collect sensitive information about you such as your racial or ethnic origin, political opinions, religious beliefs or affiliations.

Where you provide personal information on behalf of another person, you warrant that the other person has consented to the collection of their personal information for the reasons it is being collected by us.

(b) Credit-related information

Spring Gully Foods may provide goods to customers on credit, where they complete our Application for Credit Account. In connection with this credit, Spring Gully Foods will handle the consumer credit-related personal information described below (**credit-related personal information**), including information from credit reporting bodies (**CRBs**). For example, Spring Gully Foods will handle this information in providing credit to sole traders or partners in a partnership and where individuals provide personal guarantees in order to secure credit terms from Spring Gully Foods for their related company.

Spring Gully Foods may collect credit-related personal information about you such as:

1. name, sex, date of birth, driver's licence number, employer and three most recent addresses;
2. confirmation of previous information requests to CRBs made by other credit providers and credit insurers about the individual;
3. the fact that the individual has applied for credit, and the amount;
4. the fact that Spring Gully Foods is a current credit provider to the individual;
5. details of previous credit applications, including the amount and type of credit and credit limit;
6. details of current and previous credit arrangements, including credit providers, start/end dates and certain terms and conditions;



7. permitted payment default information, including information about related payment arrangements and subsequent repayment;
8. information about serious credit infringements (e.g. fraud);
9. information about adverse court judgments and insolvency;
10. publicly available information about the individual's credit worthiness;
11. any credit score or credit risk assessment indicating a CRB's or credit provider's analysis of the individual's eligibility for consumer credit.

If you do not provide personal information

The main consequence for you, if some or all of the above personal information is not collected by us is that we may not be able to provide goods (including on credit), services or information to you, or be able to provide them to the same standard of service as if we had the information requested.

How we collect personal information

(a) General

We collect personal information in a variety of ways. We mainly collect information from you when you knowingly provide it to us via our website, when you make a request or enquiry of us or when you join our mailing list.

(b) Commercial Customers

We collect personal information from our commercial customers when they provide it to us as part of the supply of goods or when they request Spring Gully Foods to provide goods on credit.

We may also collect personal information about you from your representatives, including your spouse or professional adviser (where it is reasonable and practical to do so).

We may collect credit-related information from the "Trade References/Credit Providers" or bankers you list in our Application for Credit Account, or such other credit providers named in a credit report issued by a credit reporting agency.

Spring Gully Foods may obtain a credit report from a credit reporting agency about your personal credit worthiness and activities, or where it is relevant to collecting overdue payments, in respect of credit provided to you, information in relation to collecting overdue payments.

Why we collect, hold and use and disclose personal information

We collect, hold, use and disclose personal information about individuals when we need it to carry on our business functions or to comply with laws.

We may collect, hold, use and disclose your personal information to answer your enquiry or to provide the goods, information or service that you requested.

We may also collect, hold, use or disclose your personal information:

1. to conduct checks for credit worthiness or fraud;
2. to allow a credit reporting agency to create or maintain a credit information file containing information about you;
3. to verify your identity;
4. to enable us to develop, administer and manage our services and business;
5. statistical purposes;
6. for research purposes to better improve our websites, products or services;
7. other customer support purposes;
8. to deal with complaints, queries or feedback; and
9. when authorised or required by law.



Direct Marketing

Spring Gully Foods does not engage in direct marketing.

When we may disclose your personal information to third parties

(a) General

In the course of conducting our business we may provide your personal information to:

1. credit providers and credit reporting agencies;
2. debt collectors;
3. an individual's representatives;
4. insurers, assessors and underwriters;
5. your guarantors and security providers;
6. government and regulatory authorities; and
7. our professional advisers, including our lawyers, auditors and accountants.

We may disclose your personal information to third parties:

1. to meet the purpose for which it was submitted;
2. if we have your consent to do so or otherwise when we are authorised by law;
3. if we are required by law to disclose the information.

(b) Credit-related personal information

Spring Gully Foods may disclose credit-related personal information to CRBs to assist the CRBs to maintain information about individuals to provide to other credit providers for credit assessments.

Spring Gully Foods may also exchange credit-related personal information with your credit providers as listed by you in our Application for Credit Account.

Spring Gully Foods may collect credit-related personal information from CRBs for purposes including, to the extent permitted by law, to assess relevant credit or guarantee applications, manage and review the credit or guarantee, assign debts, collect overdue payments and produce assessments and ratings in respect of the individual's credit worthiness. Spring Gully Foods may also exchange credit-related personal information with guarantors, debt buyers and other credit providers.

Spring Gully Foods may use the following organisations as a CRB:

1. Dun & Bradstreet, PO Box 7083 Sydney NSW 2001, www.checkyourcredit.com.au, 1300 734 806; and
2. Veda Advantage Information Services and Solutions Limited, PO Box 964 North Sydney NSW 2059, www.mycreditfile.com.au, 1300 762 207.

Overseas recipients

Spring Gully Foods will not disclose your personal information to overseas recipients.

Security

All personal information held by us will be handled and stored in accordance with our obligations under the Privacy Act. We will take reasonable steps to:

1. make sure that the personal information we collect, use or disclose is accurate, complete and up to date;
2. protect the information from misuse, interference, loss or unauthorised access, modification or disclosure both physically and through security methods; and
3. destroy or permanently de-identify the information if it is no longer needed for any purpose.





Spring Gully Foods Pty Ltd
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Website

When you visit our website, we or agencies on our behalf and our internet service provider may monitor and take a record of your visit and log “clickstream data” for statistical purposes such as your server’s IP address. This privacy policy is strictly limited to the collection, storage and use of personally identifiable information collected by Spring Gully Foods, in the course of business, and does not apply to any third parties. We have no control over the privacy practices or the content of any third party websites, and assume no liability for the privacy practices of these websites.

Any link on the Spring Gully Foods site to external entities are not covered within this policy. The terms and conditions set out in this privacy statement only cover the domain name of www.springgullyfoods.com.au.

Privacy

At your request we will provide details of the personal information we hold about you. The release of information is subject to some exceptions such as information relating to existing or any anticipated legal proceeding, together with exceptions provided by the Privacy Act.

Unless unusual circumstances apply, we should provide access to you within 30 days of the request.

We reserve the right to charge a fee for providing access to your information to your information when permitted by law.

To protect your personal information, the request to us must be in writing and can be sent by letter or email.

All correspondence should be addressed to:

Mail: Spring Gully Foods
184 Cavan Road
DRY CREEK SA 5094

Email: mail@springgullyfoods.com.au

Our objective is to respond to any request within a reasonable timeframe.

We also aim to ensure that your personal information is accurate, up to date and complete. Amendment of personal information will be conducted upon written or verbal request from you. Please contact us using the above information.

Complaints

We are committed to the protection of your privacy and personal information. Complaints you may have about your personal information can be lodged with us by using the contact details above.

We will attempt to resolve any complaints within 10 working days. If resolution is not possible within this timeframe we will contact you to discuss the matter further.

You also have the right under the Privacy Act to make a complaint to the Information Commissioner.

Changes to this policy

This policy is subject to change over time without prior notice. We may amend this policy by updating this posting.

Copies of this policy

You can ask us to provide you with a copy of this policy, including a hard copy, by contacting us using the contact details above.

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www.springgullyfoods.com.au