

PRIVACY STATEMENT

1 Your rights in relation to privacy

Sipcam Pacific Australia Pty Ltd ACN 073176888 (Sipcam) understands the importance of protecting the privacy of an individual's personal information. This statement sets out how Sipcam aims to protect the privacy of your personal information, your rights in relation to your personal information managed by Sipcam and the way Sipcam collects, holds, uses and discloses your personal information.

In handling your personal information, Sipcam will comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and with the 13 Australian Privacy Principles in the Privacy Act. This policy statement may be updated from time to time.

2 What kinds of personal information does Sipcam collect?

Personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of its services, Sipcam may collect your personal information to the extent relevant to the provision of its products and/or services.

Generally, the kinds of personal information Sipcam collects are contact details such as your name, address, telephone number and email address. If relevant, Sipcam may also collect information about your directorships or shareholdings.

In some circumstances Sipcam may also hold other personal information provided by you.

3 How does Sipcam collect personal information?

Generally, Sipcam collects your personal information directly from you, through the completion of a manual or online form, an interaction or exchange in person or by way of telephone, facsimile, email, post or through the use of the Sipcam website. There may be occasions when Sipcam collects your personal information from other sources such as from:

- ◆ Dun & Bradstreet Pty Ltd, for the purpose of confirming you are a director or shareholder of a company to which Sipcam is providing, or considering providing, commercial credit;
- ◆ your employer where relevant to, or necessary to facilitate, the provision of Sipcam's products and/or services to your employer;
- ◆ an information services provider or publicly maintained record; and/or
- ◆ if for recruitment purposes, an external recruitment or background screening services provider.

Generally, Sipcam will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you.

4 Why does Sipcam need your personal information?

Sipcam collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of:

- ◆ facilitating the manufacture, sale and delivery of agricultural chemicals to wholesalers and retailers;
- ◆ identifying, developing and maintaining business relationships;
- ◆ confirming you are a director and/or a shareholder of a company for which Sipcam is assessing an application for, or providing, commercial credit (however, Sipcam does not undertake credit checks in relation to you and only assesses the credit worthiness of commercial entities);
- ◆ accounting, billing and other internal administrative purposes;
- ◆ identifying and informing you of products and services that may be of interest to you from Sipcam or selected third parties;
- ◆ assessing your application for employment with Sipcam or otherwise for the purpose of engaging you as a contractor or consultant; and
- ◆ any other legal requirements.

Sipcam may also use your personal information for purposes related to the above purposes and for which you would reasonably expect Sipcam to do so in the circumstances, or where you have consented or the use is otherwise in accordance with law.

Where personal information is used or disclosed, Sipcam takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to Sipcam. However, without certain information from you, Sipcam may not be able to provide its products and/or services to you.

5 To whom does Sipcam disclose your personal information?

Sipcam discloses your personal information for the purpose for which Sipcam collects it. That is, generally, Sipcam will only disclose your personal information for a purpose set out at paragraph 4. This may include disclosing your personal information to:

- ◆ third parties engaged to perform administrative or other services, including Sipcam's software services provider;
- ◆ people or entities considering acquiring an interest in Sipcam's enterprise or assets;
- ◆ Sipcam's professional advisors, contractors, consultants and related bodies corporate;
- ◆ insurance providers; and

- ◆ relevant regulatory bodies.

This disclosure is always on a confidential basis or otherwise in accordance with law. Sipcarn may also disclose your personal information with your consent or if disclosure is required or authorised by law.

6 Overseas disclosure

Sipcarn does not disclose personal information to overseas recipients. However, if such disclosure is ever necessary in order for Sipcarn to provide its products and/or services, or for administrative or other business management purposes, Sipcarn will take steps reasonable in the circumstances to ensure the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme, unless you consent to the overseas disclosure or it is otherwise required or permitted by law.

7 Direct marketing

Sipcarn may use and disclose your personal information in order to inform you of products and services that may be of interest to you. In the event you do not wish to receive such communications, you can opt-out by contacting Sipcarn via the contact details set out in paragraph 10 or through any opt-out mechanism contained in a marketing communication to you.

8 Security of your personal information

Sipcarn takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. Sipcarn holds personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff.

Sipcarn will destroy or de-identify personal information in circumstances where it is no longer required, unless Sipcarn is otherwise required or authorised by law to retain the information.

9 Can you access and correct the personal information that Sipcarn holds about you?

Sipcarn takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that is collected and held by Sipcarn. If at any time you would like to access or correct the personal information that Sipcarn holds about you, or you would like more information on Sipcarn's approach to privacy, please contact Sipcarn via the contact details set out in paragraph 10 below. Sipcarn will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- ◆ you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- ◆ Sipcarn requests that you be reasonably specific about the information you require; and
- ◆ Sipcarn may charge you a reasonable administration fee, which reflects the cost to Sipcarn of providing access in accordance with your request.

If Sipcarn refuses your request to access or correct your personal information, Sipcarn will provide you with written reasons for the refusal and details of complaint mechanisms. Sipcarn will also take steps reasonable in the circumstance to provide you with access in a manner that meets your needs and the needs of Sipcarn.

Sipcarn will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

10 How to contact us

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications, please contact Sipcarn's Privacy Compliance Officer on 03 5223 3746

Privacy complaints

Please direct all privacy complaints to Sipcarn's Privacy Compliance Officer. At all times, privacy complaints:

- ◆ will be treated seriously;
- ◆ will be dealt with promptly;
- ◆ will be dealt with in a confidential manner; and
- ◆ will not affect your existing obligations or affect the commercial arrangements between you and Sipcarn.

Sipcarn's Privacy Compliance Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.