

# Privacy Policy

**Freedom Foods Group Limited**  
**ACN 002 814 235**

<b>Version</b>	<b>Document #</b>	<b>Document Owner</b>	<b>Approved By</b>	<b>Date Approved</b>	<b>Revision Date</b>	<b>Distribution</b>
2.0	POL_LG_003	Justin Coss	Michael Perich	14/10/2021	14/10/2022	External

## Table of Contents

Privacy Policy .....	3
1. Introduction .....	3
2. Personal Information .....	3
3. Collection of Personal Information .....	3
4. Use of Personal Information .....	4
5. Cross-border transfer.....	5
6. Application of policy and third party services.....	5
7. Access to Personal Information .....	6
8. Non-Personal Information .....	6
9. Cookies .....	6
10. General.....	7
11. Policy Review.....	7

## Privacy Policy

### 1. Introduction

Freedom Foods Group Limited and its related companies (collectively, "FFG", "us" or "we") respect your privacy and value our relationship with you. We handle your Personal Information responsibly, and we want you to be familiar with how we collect, use, and disclose your information. This Privacy Policy describes our practices in connection with your Personal Information as well as your related rights.

This Privacy Policy was adopted by the Board on 12 February 2020.

### 2. Personal Information

We are bound by the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs). The Privacy Act describes "Personal Information" as "information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. whether the information or opinion is true or not; and
- b. whether the information or opinion is recorded in a material form or not."

We apply the standards set out in the Privacy Act for dealing with Personal Information in Australia. We also apply similar standards in the countries in which we operate by making this Privacy Policy applicable to all our related companies worldwide.

### 3. Collection of Personal Information

We collect Personal Information only when it is voluntarily offered by you and it is reasonably necessary for the purposes of conducting our business. For example, we may collect your:

- a. contact information such as your name, date of birth, phone numbers, postal address and email address;
- b. employment details and educational qualifications;
- c. country of residence and citizenship;
- d. preferences in relation to our products and your purchasing history;
- e. financial and tax related information, such as tax file numbers and bank account numbers; and
- f. other information that will assist the Company in conducting our business and to provide our products and services (including but not limited to details regarding complaints).

If necessary, we may ask to you provide additional information from time to time.

Some types of personal information are considered to be more private than others including information about your racial or ethnic origin, political opinions, religious beliefs or affiliations, health or medical conditions, vaccination status, genetic information, biometric information, sexual orientation, criminal record, trade-union membership and political association membership. This type of information is called "sensitive personal information".

Sometimes we may collect sensitive personal information about you (such as health or medical information, vaccination status, criminal history checks, or your racial or ethnic origin), but we will only do this as described below.

Where possible, we attempt to collect Personal Information about an individual solely from that individual, however, at times we may be provided with Personal Information by a third party. If you provide us with Personal Information in relation to another person, you must have their consent to do so and you must make them aware of this Privacy Policy.

We may collect Personal Information in various ways including, without limitation, through:

- a. webpages, mail, email, telephone, text message, social media (such as Facebook and Instagram), facsimile or in person;
- b. competitions or marketing promotions;
- c. employment applications;
- d. Internet Service Provider (ISP); and
- e. mailing lists.

As noted above, we may sometimes need to collect and process sensitive personal information about you, but we will only do this:

- a. where you have expressly provided your consent; or
- b. where permitted by applicable laws, public health orders or regulations.

We may hold this information in our electronic and/or hard copy records, or in those of our third party contractors or service providers.

Like most ISPs, our ISP also makes a record of all your visits to websites and logs a variety of information for statistical purposes only. Our ISP also collects information such as the pages accessed and documents downloaded, links from other sites followed to reach websites, and the type of browser used. This information is anonymous and is only used for statistical and site development purposes. No attempt will be made to identify you or your browsing activities unless required by law.

#### **4. Use of Personal Information**

The purposes for which we collect, use, disclose and hold Personal Information include, without limitation:

- a. to respond to questions, comments and complaints about us and our products and services;
- b. for marketing purposes including direct marketing (for example, to email newsletters and product updates);
- c. for the purposes of trade promotions (for example, to contact winners of contests and promotions);
- d. to conduct consumer surveys, market research and studies;
- e. to comply with our legal and regulatory obligations, including any Public Health Orders; and
- f. for recruitment purposes.

By providing your Personal Information to us (or our service providers), you consent to the use of your information in one or more of these ways. We may use your Personal Information to send you notifications about special offers, product news and other communications in the future.

If you decide not to provide us (or our service provider) with the requested or necessary Personal Information, we may not be able to provide you with the relevant products, services or information, and/or we may not be able to address or deal with your communication with us in the way you expect. For example, we may not be able to respond or deal with your enquiry, assess your application, enter your entry in a promotion, or send you requested information as applicable.

Our website may include sweepstakes or other promotions that we are offering or are sometimes offering jointly with another company, and we may allow you to enter electronically in some cases. If that occurs, we will use the information you provide for the purpose of conducting the promotion (for example, to contact you if you have won) and, with your consent, to offer you products and services of ours and our joint sweepstakes sponsors (if applicable).

We may provide Personal Information to our related companies, joint promoters of promotions and/or third parties such as service providers who assist us in operating websites; assist us to provide information, products and/or services to you; or who provide professional services and advice to us.

In certain circumstances, we may be required by law to disclose Personal Information. In these circumstances, you consent to us disclosing your Personal information to comply with such requirements.

## **5. Cross-border transfer**

We are a global company on a mission to make food better around the world and, in pursuit of our mission, we sometimes need to share information (including Personal information) overseas. We may transfer your Personal Information overseas to our related companies and, where necessary, to our service providers, including IT service providers and online database service providers overseas.

Other countries may not have privacy protection laws similar to Australia and by providing us with your Personal Information, you acknowledge and consent:

- a. to the disclosure of your Personal Information in this way and to third parties located overseas;
- b. that we and any of our related companies will not be accountable under the Privacy Act or any other applicable privacy laws for any breach of your privacy by a third party recipient of your Personal Information located overseas; and
- c. that you will not be able to seek redress under the Privacy Act or any other applicable privacy laws against us or any of our related companies for any breach of your privacy by the third party recipient located overseas.

## **6. Application of policy and third party services**

This Privacy Policy applies to all our related companies and we use reasonable endeavours to protect your Personal Information from misuse, interference, loss, unauthorised access, modification or disclosure. We will take reasonable steps to de-identify or destroy all Personal information that is no longer required by us.

We use reasonable organisational, technical, and administrative measures to protect Personal Information within our organisation. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify our Privacy Officer at [privacyofficer@ffgl.com.au](mailto:privacyofficer@ffgl.com.au).

Whilst we take the protection of your Personal Information very seriously, we cannot guarantee that others will do the same. Therefore, this Privacy Policy does not address, and we are not responsible for, the privacy, data, or other practices of any third parties, including any third party operating any website or service to which our website links. The inclusion of a link on our website or social media pages does not in any way imply endorsement of the linked website or service by us or any of our related companies.

In addition, we are not responsible for the data collection, use, disclosure, or security policies or practices of other third party organisations or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider, or device manufacturer, including with respect to any Personal information that you disclose to other organisations through or in connection with our apps or social media pages.

## **7. Access to Personal Information**

You can access, update and correct your Personal Information that we hold by contacting the Privacy Officer at [privacyofficer@ffgl.com.au](mailto:privacyofficer@ffgl.com.au).

If, however, we have a reason under the Privacy Act, APPs or other relevant laws to refuse your request to access or correct your Personal Information held by us, we will do so. If we refuse to provide you with access to or correct your Personal Information held by us, we will provide written reasons for such refusal and the mechanisms available for you to complain about the refusal.

We will take reasonable steps to ensure that your Personal Information is accurate, up-to-date and complete; and to provide you with access that meets both our and your needs or, where it is reasonable and practicable to do so, in the manner requested by you. If you disagree about whether your Personal Information is accurate, complete, up-to-date, relevant or not misleading, you can request us to associate with the information a statement claiming that the Personal Information is inaccurate, incomplete, out-of-date, irrelevant or misleading and we will take reasonable steps to do so.

Even if you don't submit a request, if we are satisfied, having regard to the purpose for the use or disclosure of the Personal Information, that your Personal Information is inaccurate, incomplete, out-of-date, irrelevant or misleading, we may take reasonable steps to correct that information.

## **8. Non-Personal Information**

Any non-Personal Information, communications and material that you provide to us through any means including without limitation our website, by telephone or by email are on a non-confidential basis, unless you expressly inform us otherwise in writing. We may use and reproduce any such information freely, and for any purpose whatsoever. Specifically, we will be free to use any ideas, concepts, know-how or techniques contained in such information for any purpose, including developing, manufacturing or marketing products. Any information you provide to us must be truthful, legal and not violate the rights of others, including intellectual property rights.

## **9. Cookies**

Like many companies, we use "cookie" technology, where our servers deposit special codes on a visitor's computer. Amongst other things, this information can help us determine the total number of visitors to our website on an ongoing basis and the types of internet browsers and operating systems used by our visitors. This information is used to enhance your on-line visits. For more

information on how we use cookies, please see our Cookies Policy.

## **10. General**

We may modify this Privacy Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website.

If you have any questions or complaints regarding the way we handle, or have handled, your Personal Information, or you wish to access or correct your personal information, please contact our Privacy Officer by sending an email to [privacyofficer@ffgl.com.au](mailto:privacyofficer@ffgl.com.au). When our Privacy Officer receives your email, they will respond to your request or complaint as soon as possible. However, if we have a reason under the Privacy Act, APPs or other relevant laws to refuse your request to access or correct your Personal Information held by us, we will do so. If we refuse to provide you with access to or correct your Personal Information, we will provide written reasons for such refusal and the mechanisms available for you to complain about the refusal.

## **11. Policy Review**

This Privacy Policy will be reviewed by the Board least once every two years from the date it was adopted.