

# Privacy Policy

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

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## 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.

We will not collect Sensitive Personal Information (as the term is defined in the Privacy Act), such as health information, without your consent.

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.

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; and
- e. 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.

## **Privacy Collection Statement**

### **1. How we use your Personal Information?**

We are committed to protecting your Personal Information. We (and/or our service providers) collect your Personal Information only when it is voluntarily provided and if it is reasonably necessary for the purposes of conducting our business. For example:

- a. to deliver the products and/or services that you have requested from us, or so that you can deliver the services and/or products that we have requested from you;
- b. to respond to your requests, questions and comments;
- c. to conduct product, demographic and market research;
- d. to send you marketing materials or newsletters about our products;
- e. to inform you of and conduct our contests and promotional offers; and/or
- 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. If you decide not to provide us (or our service provider) with the necessary Personal Information, we may not be able to provide you with the relevant products, services or information.

We also use “cookie” technology to collect information when you visit our websites. This is used for statistical purposes to enhance our websites and your online visits. For more information on how we use cookies, please see our Cookies Policy.

### **2. Direct marketing**

If you do not wish to receive marketing materials from us, you can unsubscribe by clicking the unsubscribe function in any electronic communication, or by contacting our Privacy Officer at [privacyofficer@ffgl.com.au](mailto:privacyofficer@ffgl.com.au) and advising that you no longer wish to receive these marketing materials from us.

### **3. How we may disclose your personal information**

We may disclose your Personal Information to our related companies; joint promoters of promotions; or third parties, such as service providers, who assist us in conducting our business or providing the information, products or services that we are providing to you.

Occasionally, we may disclose your Personal Information overseas, for example, to our related companies or overseas web service providers. These countries may not have data protection laws similar to Australia. By providing us (or our service providers) 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; and
- b. that we or any of our related companies will not be accountable under the Privacy Act 1988 (Cth) (Privacy Act) or any other applicable 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 laws against us or any of our related companies for any breach of your privacy by the third party recipient located overseas.

#### **4. Sale of our brands or business**

In connection with the sale of one or more of our brands or a part of our business to a different company, we reserve the right to transfer your Personal Information to a new owner that agrees to comply with the APPs.

#### **5. You may access and update personal information**

If you wish to access, correct or update your Personal Information or if you have any complaints about the way we handle, or have handled, your Personal Information; or if you consider that we have breached the APPs, please contact our Privacy Officer at [privacyofficer@ffgl.com.au](mailto:privacyofficer@ffgl.com.au). Once the Privacy Officer has received your email, they will respond to your request or complaint as soon as possible. Please see our Privacy Policy for more information about accessing or correcting your Personal Information; and privacy complaints.

#### **6. Updates to Privacy Collection Statement**

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

#### **7. Note to parents and caregivers**

We care about the privacy of children. We recognise that children's use of the internet, social media and email raise special concerns regarding privacy and security of information.

We remind and encourage all parents to check and monitor their children's online activities. Help us protect the privacy of your children by ensuring that they never send email, engage in social media activities, or submit Personal Information on our websites without your permission.

For your children's enjoyment, we occasionally link to other sites or social media pages. We are not responsible for those other sites or social media pages, and we advise you to check their privacy policies as well.

#### **8. Variation**

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

#### **9. Additional information for employment candidates**

We and our related companies are committed to respecting the privacy of our online visitors and employment candidates. Please read our Privacy Policy and Privacy Collection Statement before you



provide any Personal Information for the purpose of applying for employment at our company.

This additional information for employment candidates describes what type of information we collect when you provide Personal Information to us online, via email, or via our website (including careers pages) and how we use that information.

#### **10. The personal information we collect and how we use it.**

‘Personal information’ may include your name, address, email address, job experience and history and any other Personal Information that you voluntarily provide about you and your skills and interests. This information will be used to evaluate your qualifications for available roles and possibly to contact you for further information.

By providing your Personal Information to us you acknowledge and agree that the information you provide is complete and correct to the best of your knowledge. If you do not provide requested Personal Information or provide false information during the application process your application may be rejected or terminated.

Unsuccessful job applications may be retained. If you do not want us to retain your Personal Information, please contact our Privacy Officer at [privacyofficer@ffgl.com.au](mailto:privacyofficer@ffgl.com.au).

#### **11. Consent and authorisation**

By submitting your Personal Information to us online, by email or via our website (including careers pages), you consent to us (and/or our service providers and authorised agents) undertaking a background investigation including, but not limited to, a criminal background check, reference checks, verification of any information that you have provided, and you authorise all companies, businesses, educational institutions, persons, law enforcement agencies, courts and former employers to release information that they may have about you.

#### **12. Disclosure of personal information**

We may share your Personal Information to our related companies, professional advisers and/or to third parties, such as service providers who assist us (for example, database administrators, or recruitment agents who assess your suitability for available positions or who offer professional advice to us).

Further, in some circumstances we or our related companies may be required by law to report Personal Information that you provide to us. Where such a requirement occurs, you consent to us disclosing your information (including Personal Information) to comply with such requirements.

Sharing this information in the ways described above may involve the transmission of your Personal Information overseas. These countries may not have data protection laws similar to Australia. 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; and
- b. that we or any of our related companies will not be accountable under the Privacy Act or any other applicable 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 laws against us or any of our related companies for any breach of your privacy by the third party

recipient located overseas.

## **Cookies Policy**

### **1. Adoption**

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

### **2. Cookies**

We use cookies, and similar technology, on our websites. This notice provides you with information about how we use cookies and how you can control them.

By using our website, you accept the use of cookies (and similar technology) in accordance with this Cookies Policy. In particular, you accept the use of analytics, advertising and functionality cookies for the purposes described below.

If you do not accept the use of these cookies, please see the section below entitled 'Managing and Deleting Cookies' for further instructions.

For information on how we handle your Personal Information, including any Personal Information processed via cookies on our websites, please see our Privacy Policy and Privacy Collection Statement.

### **3. What is a cookie?**

Cookies are small files of letters and numbers that are downloaded to your computer or mobile device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie.

Cookies are useful because they allow a website to recognise a user's device. Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving the user experience. They can also help to ensure that the adverts you see online are more relevant to you and your interests. We use two broad categories of cookies:

- a. First party cookies: served directly by us to your computer; and
- b. Third party cookies: served by a third party on our behalf. We use third party cookies to help us analyse our websites and their use, and to enable tailored advertising (as described below).

### **4. How we use cookies?**

We and third parties use cookies on our websites, including to:

- a. understand the total number of visitors to our sites on an ongoing basis and the types of internet browsers and operating systems used by our visitors;
- b. monitor our websites' performance, including how visitors navigate our websites, and to improve our websites;
- c. customise and enhance your online experience; and
- d. enable tailored advertising both on and off our websites.

### **5. What types of cookies do we use?**

The types of cookies used on our websites can be classified into one of four categories, namely 'essential website cookies', 'functionality cookies', 'analytics cookies' and 'advertising cookies'. The following table gives you further information about each category, and the purposes of the cookies we set:

Type	Purpose
<p><b>Essential website cookies</b> (from us)</p>	<p>These cookies are essential to enable you to move around our websites and use their features. These cookies don't gather information about you that could be used for marketing or remembering where you have been on the internet. These cookies are often session-specific, expiring after your visit to the website (session) has ended.</p>
<p><b>Functionality Cookies</b> (including from us and YouTube):</p>	<p>These cookies allow our websites to remember choices you make (such as your username, language or region you are in) and provide enhanced, more personal features.</p>
<p><b>Analytics cookies</b> (including from Omniture, Google Analytics, Fabric)</p>	<p>These cookies are used to collect information about how visitors use our sites, including the number of visitors, the websites that referred them to our websites and the pages that they visited on our websites, and certain websites that they visited after leaving our websites. We use this information to compile reports and help us improve our websites, for example, by letting us know if users find any errors and by ensuring that users find what they are looking for easily.</p>
<p><b>Advertising cookies</b> (including from Facebook, Twitter, Yahoo, Fabric)</p>	<p>These cookies are used to collect data about the websites and individual pages that users visit both on and off our websites (which might indicate, for example, your interests and other attributes). They are typically used to deliver advertisements and other marketing communications more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as to help measure the effectiveness of the advertising campaign. This information is shared with other organisations such as advertisers and our partners, who might use it with information about how you use other websites, including to identify shared interests and behaviours across groups of users who visit our (and other) websites.</p>

## **6. Managing and deleting cookies**

We understand that you may want to control which cookies are set as part of your visit to our sites. You can manage the use of cookies on your devices by using functions available on most internet browsers, and cookies can also be deleted by your device's storage medium at any time.

If you choose to delete or refuse cookies, please bear in mind that you may not be able to use the full functionality of our websites and any communications you receive from us may be less relevant to you than they might otherwise have been.

## **7. Policy review**

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