

General Privacy Policy (Aus & NZ)

Effective date	11 March 2014
Policy owner	Group Legal
Applies to	All GWF employees, contractors, customers & visitors Australia New Zealand
Contact Officer	Your Privacy Officer

This signed statement of Policy confirms our commitment to making George Weston Foods Limited workplaces legally compliant for ALL and is to be displayed at all work locations.

Purpose and aims

George Weston Foods Limited, George Weston Foods (NZ) Limited and their related companies (**GWF, we, us, our**) recognise the importance of your privacy and is committed to protecting personal information which we hold.

We are bound by a range of privacy laws including applicable privacy principles under the *Privacy Act 1988* in Australia and the *Privacy Act 1993* in New Zealand.

This General Privacy Policy (**Policy**) describes how we manage personal information and safeguard the privacy of people who are not our current or former employees (**you, person, people**).

If you are a current or former employee of George Weston Foods Limited whether on a full-time, part-time or casual basis, the **GWF Employee Privacy Policy** applies. Please see the People Portal or contact GWF's People and Performance department for details.

This Policy may be reviewed, varied, added to or withdrawn by GWF at any time, at our absolute discretion. This Policy, and any amendments to it, does not form part of your employment contract or agreement or your independent contractor agreement (as the case may be).

Collecting personal information about you

We may collect personal information that is necessary for us to perform our functions or as otherwise authorised by law. The kinds of personal information we collect and hold depends on your relationship with us, including the type of products and services we provide to, or acquire from, you. It may include, for example:

- your name, contact details, identification information, enquiry/complaint details and details of your dealings with us;
- information you give us when you request a product or service from us or enter one of our competitions or surveys;
- information you give us when you provide a product or service to us;
- credit related information necessary to assess applications for credit and personal guarantees;
- records of communications between us and you (including monitoring and recording of telephone, email and online communications for quality and record-keeping purposes);
- if you have or had one of our products, information you have provided about the use of that product or your opinions about that product; and
- if you apply for a position with us, information about your qualifications, experience, character and screening checks (including health, reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks).

We may collect personal information about you from third parties including related companies, credit reporting agencies, your agents or representatives, publicly available sources of information and the parties with whom we exchange information as described here.

If you apply for a position with us, we may collect your personal information from third parties such as recruitment service providers, referees, former employers, educational institutions and, if appropriate, health and psychometric testing providers and police. We may use that personal information to assess suitability for positions with GWF and to make contact about relevant position.

If you are a contractor working at a GWF workplace, we may use biometric technology such as finger print swipe technology. The information collected will be in accordance with this Policy and will be used for time recording and payroll purposes. All biometric information will be collected through the secure Kronos system, which is electronically encrypted and to which access is strictly limited to staff whose tasks require access. All biometric information is securely destroyed upon termination of a contractor's engagement with GWF.

If you visit a GWF site, surveillance cameras may be in use to improve and monitor the safety and security of GWF staff, property and resources and to monitor and investigate compliance with legal requirements and GWF policies. Images may also be used in connection with legal proceedings.

If you use a GWF website (e.g. georgewestonfoods.com.au) we may use cookies to collect information such as the pages you visit or the information you request.

If the information sought is not provided, we may not be able to provide products or services to you, or otherwise interact with you, effectively or at all.

Using & disclosing your personal information

In some circumstances we may use or disclose personal information to improve our products or services, including our websites, or to provide you with information about products and services offered or distributed by us.

We may use contractors' personal information for payroll, superannuation, health and safety, administration, insurance (including WorkCover or Worksafe), contact and staff management purposes. Some of that information we are required to collect under the Fair Work Act, the Taxation Administration Act, the Income Tax Assessment Act, the Superannuation Industry (Supervision) Act, the Work Health and Safety Act and any other relevant laws. In extreme circumstances we may need to restrict an individual's access to the workplace or take disciplinary action.

We may exchange your personal information with:

- providers of mail house, credit reporting agencies, debt collection, legal advisory, accounting, business consulting, banking, payroll, surveillance, archiving, delivery, training, security, data processing and other services, including such parties based overseas;
- your representatives including your legal advisers and unions;
- if you apply for a position with us, providers of recruitment, health and psychometric testing services and your educational institutions, referees and former employers;
- parties involved in a purchase or prospective purchase of any part of our business;
- third parties which you allow us to exchange your personal information with.

Information processed by these third parties may include sensitive information. We require these third parties to handle the personal information strictly in accordance with the Privacy Act

When we no longer require personal information for any of the purposes for which it was collected we will, subject to any on-going legal requirements to retain it, take reasonable steps to destroy or de-identify it.

The use, collection and disclosure of your information described above may involve us disclosing your personal information to third parties in countries including Australia, New Zealand, United Kingdom, Netherlands, Finland, Germany, Belgium, Poland, Austria, France, Italy, Turkey, Portugal, Spain, United States, Mexico, Canada, China, India, Pakistan, Sri Lanka, Thailand, Vietnam, Indonesia, Malaysia, Singapore, South Africa, Tanzania, Malawi, Zambia, Mozambique, Swaziland, Columbia, Ecuador, Peru, Uruguay, Brazil, Chile and Argentina. Where we disclose personal information to other countries, we are often subject to cross-border disclosure privacy requirements which are designed to protect your privacy in these situations.

Protecting your personal information

We have obligations to take reasonable steps to protect personal information from misuse, interference, loss and from unauthorised access, modification and disclosure, irrespective of whether we hold the information physically, electronically or with the assistance of our service providers. These steps include confidentiality obligations on our staff and the use of security measures for access to our computer systems.

Access to your personal information

You can request access to personal information that we hold about you. We will deal with all requests for access as quickly as practicable. Requests for a large amount of information, or information which is not currently in use may require further time before a response can be given. You may be required to pay a reasonable charge to access your personal information.

If you request us to do so we will amend any personal information about you held by us which is inaccurate, incomplete or out of date. If we disagree with you about the accuracy, completeness or currency of a record of your personal information held by us, and if you ask us to record your request, we will take reasonable steps to associate a statement to that effect with the relevant record.

Changes to our Privacy Policy

From time to time it may be necessary for us to change this Policy. We will notify any changes by posting an amended version on our website.

Who to contact

If we become aware of any concerns or problems with information held by us, we will take these issues seriously and work to address them. If you would like to access personal information that we hold about you, or have a question or complaint, please contact us at

GWF Consumer Information Centre (CIC)

PO Box 555

Enfield NSW 2136

Phone: 1800 645 515

Email: consumer@gwf.com.au

In the case of complaints, GWF will endeavour to respond as soon as possible, within 14 working days, to let you know who is responsible for managing your query. GWF will try to resolve the complaint within 30 working days. When this is not possible GWF will contact you to provide an estimate of how long it will take to handle the complaint.

Last Modified: March 2014