



## PRIVACY POLICY – ROGERS & COMPANY FOODS

Rogers & Co. Foods Pty. Ltd. ACN 007 432 804 as trustee for the D & H Rogers Family Trust ABN 64 545 853 194 (Rogers & Company Foods, we, us, our).

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### 1. Commitment

- 1.1. **Rogers & Company Foods** respects your privacy and is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.
- 1.2. We have adopted the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (**the Privacy Act**). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.
- 1.3. This Privacy Policy explains how we collect, use, store and disclose Personal Information in accordance with the Privacy Act and the APPs.
- 1.4. A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).
- 1.5. If you are not a natural person:
  - a) you warrant that any person that places an Order on your behalf is authorised to do so and will also do so as agent for each of your related entities that use or access our Products; and
  - b) you must procure that your Personnel comply with this Agreement, and you take responsibility for the acts and omissions of your Personnel.
- 1.6. We are committed to managing data breaches in accordance with the Notifiable Data Breaches Scheme under the Privacy Act. In the event of a data breach involving Personal Information that is likely to result in serious harm, we will:
  - a) take immediate steps to contain the breach;
  - b) conduct an assessment;
  - c) notify affected individuals and the Office of the Australian Information Commissioner as required.

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### 2. What is Personal Information and why do we collect it?

- 2.1. Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we may collect include:
  - a) names;
  - b) addresses;
  - c) email addresses;
  - d) phone and facsimile numbers;
  - e) Credit Information,
  - f) bank details;
  - g) Employee Information (subject to the exemptions contained in the Privacy Act);
  - h) Tax File Information;
  - i) information about your preferences, interests, and usage of our products or services;
  - j) information related to your interactions with us, such as inquiries or customer support requests;
- 2.2. We may collect Personal Information from you in many ways including interviews, correspondence, by telephone and facsimile, by email, via our website [www.rogersfoods.com.au](http://www.rogersfoods.com.au) (**Website**), your website, from media and publications, from other publicly available sources, from cookies- and from third parties. We don't guarantee website links or policy of authorised third parties.
- 2.3. We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.
- 2.4. When you visit and interact with our website, we use cookies, tags, pixels and other tracking technologies to collect your personal information.
- 2.5. For example, we may collect your Personal Information to:
  - a) process and deliver orders;
  - b) provide customer service and support;
  - c) issue invoices and receipts;



- d) manage payments and accounts;
  - e) send you product update and marketing communications (you can opt out at any time);
  - f) improve our products and website; and
  - g) comply with legal and regulatory requirements.
- 2.6. When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.
- 2.7. We do not sell or rent Personal Information to third parties.
- 2.8. If we receive Personal Information that we did not request, we will determine whether we are permitted to collect it under the Privacy Act. If we are not permitted to retain it, we will take reasonable steps to destroy or de-identify the information as soon as practicable.
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### **3. Sensitive Information**

- 3.1. Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.
- 3.2. We do not intentionally collect or use Sensitive Information. If you provide Sensitive Information to us for any reason, you do so voluntarily. We will not use or disclose Sensitive Information unless required or authorised by law, and we will take reasonable steps to delete or de-identify it.
- 3.3. Sensitive information will be used by us only:
- a) for the primary purpose for which it was obtained;
  - b) for a secondary purpose that is directly related to the primary purpose;
  - c) with your consent; or
  - d) where required or authorised by law.
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### **4. Third Parties**

- 4.1. Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.
- 4.2. We may use third party platforms such as Google Analytics, Meta tracking tools or similar services. These providers may store information on servers located outside Australia.
- 4.3. You can disable cookies in your browser settings, although some website features may not function correctly if you do so.
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### **5. Disclosure of Personal Information**

- 5.1. Your Personal Information may be disclosed in a number of circumstances including the following:
- a) third parties where you consent to the use or disclosure; and
  - b) where required or authorised by law.
- 5.2. We may disclose Personal Information to our service providers who operate or store data overseas, including in the United States, the United Kingdom, the European Union and the Asia-Pacific region. These providers assist us with IT services, website hosting, email distribution and data storage.
- 5.3. You consent to us disclosing your Personal Information to trusted service providers who assist us with:
- a) payment processing;
  - b) warehousing, delivery and logistics;
  - c) IT support and website hosting;
  - d) marketing and email distribution;
  - e) professional advisors (accountants, lawyers, auditors);
  - f) a prospective purchaser of our business provided they first undertake in favour of us to keep the Personal Information confidential and comply with the APPs with your Personal Information. The undertaking must be in a form approved by us.
- 5.4. We will make all reasonable attempts to de-identify your name when disclosing your Personal Information to third parties.
- 5.5. We take reasonable steps to ensure that the Personal Information we collect, use and disclose is accurate, complete and up to date. This may include requesting that you verify your details or update your account information.
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### **6. Security of Personal Information**

- 6.1. Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.



- 6.2. When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.
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#### **7. Access to your Person Information**

- 7.1. You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.
- 7.2. Rogers & Company Foods will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.
- 7.3. In order to protect your Personal Information we may require identification from you before releasing the requested information.
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#### **8. Website, cookies and analytics**

- 8.1. Our website uses cookies, tracking technologies and analytics tools to improve site performance, enhance your experience and support our marketing activities. These tools may collect information such as IP addresses, browsing behaviour, device identifiers and interaction with our website.
- 8.2. You can disable cookies in your browser settings, although some website features may not function correctly if you do so.
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#### **9. Direct marketing activities**

- 9.1. We may use your Personal Information to send you marketing and promotional materials, product updates or special offers. You may opt out of receiving such communications at any time by following the unsubscribe instructions or contacting us at [admin@rogersfoods.com.au](mailto:admin@rogersfoods.com.au).
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#### **10. Interpretation**

Capitalised words have the same meaning as the words ascribed to them in the Privacy Act.