



HUON AQUACULTURE GROUP LIMITED (ABN 79 114 456 781)

PRIVACY AND CREDIT REPORTING POLICY

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Privacy Policy

1 AIM

Huon Aquaculture Group Limited (ABN 79 114 456 781) (**we, our or us**) is committed to complying with its obligations under the *Privacy Act* 1988 (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**).

We are committed to respecting your privacy and protecting your personal information. Our staff are trained to protect your personal information in accordance with our policies, procedures and systems.

2 POLICY

This policy outlines how we manage and secure your personal information. It also describes the kinds of personal information that we hold and for what purposes, and how that information is collected, held, used and disclosed.

This policy also includes our credit reporting policy. It contains additional information on how we manage your personal information collected in connection with a credit application, or a credit facility. We refer to this credit-related information as **credit information**.

This policy is easy to access and is available on our website at www.huonaqua.com.au/privacy. You may request a copy of the policy by contacting the Privacy Officer in accordance with paragraph 16.1 of this policy.

Please read this policy carefully before you provide us with any personal information.

We will review this policy from time to time. We encourage you to check our website regularly as any updated policy will be available on our website.

3 TYPES OF INFORMATION THAT WE COLLECT AND HOLD

3.1 General information

We may collect and hold the following types of personal information about you:

- (a) identification information, including your name, date of birth, postal address, email address, fax number, telephone number, tax file number and drivers licence number;
- (b) billing and payment details;
- (c) complaint details;
- (d) information about goods and/or services ordered;

- (e) information about any enquiries you have made;
- (f) occupation;
- (g) employment information;
- (h) income details;
- (i) Centrelink reference numbers,
- (j) passport numbers;
- (k) health care identifiers;
- (l) pensioner and customer concession status;
- (m) details of references;
- (n) credit information such as details relating to your credit history, eligibility for commercial credit and credit capacity; and
- (o) any other information that we consider to be reasonably necessary.

3.2 Credit reports

When you apply for commercial credit, we need to know if you will be able to meet repayments under your commercial credit contract with us. As such, we may need to obtain a credit report about you.

Credit reports contain information about your credit history which helps us to assess your commercial credit application, verify your identity and manage any accounts you hold with us. We can collect from and disclose this information to credit reporting bodies and other credit providers in certain circumstances, including when you make an application for commercial credit.

The Privacy Act limits the information that credit providers can disclose about you to credit reporting bodies, as well as the ways in which credit providers can use credit reports.

3.3 Credit information

In order to assess your credit worthiness we may need to collect certain information about you from, and give it to, credit reporting bodies. This information may include:

- (a) identification information, including names, an alias or previous name, sex, date of birth, current or last known address, 2 previous addresses (if any), name of current or last known employer and drivers licence number;

- (b) information request details (i.e. a record of us asking a credit reporting body for information in relation to a credit application, including the type and amount of credit applied for or a credit guarantee);
- (c) payment information (i.e. if we disclose default information about you to a credit reporting body and the overdue amount is paid, a statement that the payment has been made); and
- (d) court proceeding information, personal insolvency information and publicly available information that relates to your credit worthiness.

Please note that information we obtain from credit reporting bodies or information we derive from such information is known as **credit eligibility information**.

3.4 Sensitive information

We may need to collect sensitive information about you. Unless the collection of the sensitive information is permitted under the Privacy Act, we will only collect sensitive information with your consent where that information is reasonably necessary for our functions.

We may collect and hold the following types of sensitive information about you:

- (a) political opinions;
- (b) information about religious beliefs or affiliations;
- (c) membership of a trade union;
- (d) health information;
- (e) Criminal convictions disclosed or otherwise collected during the recruitment process.

3.5 Information required by law

We may collect personal information about you because the collection of the information is required or authorised by law or a court/tribunal order.

3.6 Website activity

We also collect de-identified information through cookies and Google analytics. Although the information collected does not identify you, it provides us with:

- (a) useful statistics so that we can analyse and improve our web services; and

(b) information about your visits to our website.

3.7 Cookies

Cookies are small strings of information that are stored on your web browsers. We may use cookies to gather information about your visits to our website and enhance your experience. We use cookies to provide you with a better and more user-friendly website experience. We may use cookies to maintain session information about you when you log into our website. That information helps us to understand your preferences and improve your website experience.

You can change your browser's cookie settings via your browser privacy settings. You can also block the use of cookies. However, if you chose to delete or block cookies, certain features of our website may not be available.

3.8 Social media

We may collect information about you when you interact with us through social media channels. Please note that we will only interact with you on confidential matters via a secure forum.

4 COLLECTING YOUR INFORMATION

4.1 Collecting personal information

We collect your personal information (including credit information) so that we can perform our functions and activities.

We will, if it is reasonable and practical to do so, collect personal information directly from you.

We may collect your personal information when:

- (a) you fill out a paper or electronic form;
- (b) you make an enquiry;
- (c) you request information;
- (d) you submit an order;
- (e) you provide feedback;
- (f) you make a submission;
- (g) you give us paper correspondence;

- (h) you participate in a competition or promotion run by us;
- (i) you send us electronic correspondence;
- (j) you give us information over the telephone, via fax or post;
- (k) you apply for employment or respond to an expression of interest for employment;
- (l) you interact with us electronically or in person;
- (m) you access our website; or
- (n) we supply goods and/or services to you.

4.2 Collecting personal information from other sources

Sometimes we collect personal information about you from other sources where it is necessary to do so. This may happen where:

- (a) you have consented to the collection of the information from someone else;
- (b) we are required or authorised by law to collect the information from someone else; or
- (c) it is unreasonable or impracticable to collect the information from you personally.

Examples of other sources that we may collect personal information from include, but are not limited to:

- (a) your former employers;
- (b) information that is publicly available;
- (c) our related entities;
- (d) agencies that we engage to administer community grants or consultations;
- (e) your references;
- (f) our suppliers, agents, representatives and service providers;
- (g) your authorised representatives, including any person who has authority to act on your behalf;
- (h) banks and financial institutions, including merchant services;

- (i) third party records verification agencies;
- (j) ASIC;
- (k) government departments and agencies; and
- (l) our business partners to whom you have provided your personal information.

4.3 Collecting credit information from third parties

Sometimes we collect credit information about you from the following third parties:

- (a) credit reporting bodies;
- (b) other credit providers;
- (c) debt collection agencies; and
- (d) your references.

4.4 What happens if you do not provide us with your personal information?

If you do not provide us with your personal information, we may not be able to:

- (a) verify your identity;
- (b) provide you with the goods and/or services you want;
- (c) provide you with any commercial credit;
- (d) respond to your enquiries or requests to do business with you or the organisation you are connected with;
- (e) manage your accounts; and/or
- (f) offer an applicant employment.

4.5 Unsolicited personal information

If we collect personal information about you that we did not ask for, we will check whether we could have collected that information ourselves. If we could have collected the information, we will handle it in the same way we handle other information we collect from you. If:

- (a) we could not have collected the personal information; and

(b) the information is not contained in a Commonwealth record,

we will destroy the information or de-identify the information provided it is lawful and reasonable to do so.

4.6 Notification of collection of personal information

When we receive personal information directly from you, we will take reasonable steps to notify you of the collection and the circumstances that surround the collection.

Sometimes:

(a) we collect your personal information from third parties; or

(b) you may not be aware that we have collected your personal information.

If we collect information that can be used to identify you, we will take reasonable steps to notify you of the collection and the circumstances that surround the collection.

5 PROTECTING PERSONAL INFORMATION

5.1 Storing personal information

We are committed to keeping your personal information secure.

We store your personal information in different ways, including in physical and electronic form, via cloud and other third party data storage providers.

We treat all personal information as confidential. We will take reasonable steps to ensure personal information is protected from:

(a) misuse, interference and loss; and

(b) unauthorised access, modification and disclosure.

5.2 How we store your information

Some of the ways we store your information are:

(a) in locked cabinets;

(b) document storage facilities;

(c) external tape service;

(d) online archives;

(e) confidentiality requirements for employees;

- (f) security measures for access to systems;
- (g) limiting access to personal information to those people who need to know that information;
- (h) control of access to buildings;
- (i) electronic security systems, such as firewalls and data encryption, user identifiers, passwords and other codes, antivirus and antispyware; and
- (j) backup and recovery of systems.

5.3 What happens if we no longer need your personal information?

If we no longer need your personal information for any purpose, we will take reasonable steps to destroy or permanently de-identify the information, unless:

- (a) the information is contained in a Commonwealth record; or
- (b) we are required by law, or a court/tribunal order, to retain the information.

6 PURPOSES FOR COLLECTING, HOLDING, USING AND DISCLOSING INFORMATION

We collect, hold, use and disclose your personal information for the purpose it was collected and related purposes, including:

- (a) to identify you;
- (b) to give you information about the goods or services we or our related entities provide,
- (c) to consider your request for us to supply goods or services;
- (d) to enable us to supply goods or services;
- (e) to manage your accounts;
- (f) to manage and deal with any possible legal actions, including dispute resolution;
- (g) for billing purposes;
- (h) to provide you with commercial credit;
- (i) to collect overdue payments;
- (j) to respond to complaints;

- (k) to administer community consultation;
- (l) to deal with any enquiries or any feedback you may have;
- (m) if you enter one of our competitions or promotions, to administer your participation in that competition or promotion;
- (n) to manage and respond to requests for information;
- (o) to assess your application for a community grant (if applicable);
- (p) for general administrative purposes;
- (q) for research, analysis and statistical purposes;
- (r) for direct marketing;
- (s) to perform risk assessments;
- (t) to assist in monitoring and reviewing customer service;
- (u) to establish and maintain customer records;
- (v) for workplace health and safety purposes;
- (w) for employment and recruitment purposes;
- (x) to manage relationships with our business customers, suppliers, services providers and contractors;
- (y) to comply with any applicable laws, regulations or codes of practice;
- (z) to obtain a credit report;
- (aa) to consider your credit worthiness;
- (bb) to assess and process your commercial credit application; and
- (cc) for any other purpose for which you have given your consent.

7 USE AND DISCLOSURE OF INFORMATION

7.1 Use and disclosure of personal information

We will not use or disclose personal information we hold about you that was collected for a particular purpose for another purpose, unless:

- (a) you have consented to the use or disclosure of the information for another purpose; or
- (b) the use or disclosure is otherwise permitted under the Privacy Act (e.g. you would reasonably expect us to use or disclose the information for another purpose or the use or disclosure of the information is required or authorised by law or a court/tribunal order).

7.2 Disclosure to third parties

Sometimes we may disclose personal information about you to third parties. Examples of third parties that we may disclose your personal information to include, but are not limited to:

- (a) our service providers, suppliers, agents and representatives;
- (b) our related entities;
- (c) your representatives, including any person acting on your behalf;
- (d) government departments and agencies;
- (e) credit reporting bodies;
- (f) other credit providers;
- (g) debt collection agencies;
- (h) banks and financial institutions for payment processing;
- (i) as required or authorised by law or a court/tribunal order; and
- (j) any other person where you have given your consent.

7.3 Credit information

We will not disclose credit information unless the use or disclosure is permitted under the Privacy Act.

7.4 Disclosure of credit information to credit reporting bodies

As outlined above, we may disclose your credit information to one or more credit reporting bodies. The contact details of the credit reporting body we currently use are outlined below:

Veda Advantage Ltd

Telephone: 1300 921 621

Address: Veda, PO Box 967, North Sydney NSW 2059

Online: www.veda.com.au

The credit reporting body outlined above has a credit reporting policy about how it handles your credit information. For more information, or to request a copy of its credit reporting policy, you can contact it directly.

7.5 Overseas recipients

We may need to disclose your personal information to recipients outside Australia in limited circumstances, including to our overseas service providers. These recipients are likely to be located in Japan, China, Indonesia and New Zealand.

We may store your personal information outside Australia via cloud and with our service providers. If so, this information is likely to be stored in Malaysia, Singapore and the United States. As data storage can be accessed from various countries via an internet connection, it is not always practicable for us to know what country your personal information may be held in. As such, disclosure may sometimes occur in countries other than those listed.

7.6 Disclosure

Where your personal information is disclosed, we will:

- (a) take reasonable steps to ensure that the overseas recipient does not breach the APPs, unless an exception in the Privacy Act applies; and
- (b) seek to ensure that information is used, held and disclosed consistently with the Privacy Act and any other applicable laws.

8 DIRECT MARKETING

8.1 Direct marketing

We may use or disclose your personal information (excluding sensitive information) for direct marketing purposes.

8.2 Sensitive information

We will only use or disclose your sensitive information for the purposes of direct

marketing if you have consented to the information being used or disclosed for the purposes of direct marketing.

8.3 Method of direct marketing

We may conduct direct marketing:

- (a) via email;
- (b) in person;
- (c) when you complete a form; and
- (d) via social media platforms.

8.4 Opt-out

If at any time you decide you:

- (a) do not want to receive any more direct marketing material from us;
- (b) do not want us to use or disclose the information for direct marketing in the future; and/or
- (c) want to know where we obtained the information,

you may:

- (d) contact the Privacy Officer in accordance with paragraph 16.1 of this policy; or
- (e) opt-out of receiving any more marketing material via any opt-out mechanism contained in our marketing correspondence.

All our marketing correspondence will display a clearly visible and user-friendly opt-out mechanism. We may imply consent to receive direct marketing material if you do not use the opt-out mechanism.

8.5 Processing requests

If you request to no longer receive direct marketing material we will process your request within a reasonable period after the request is made.

8.6 Pre-screening

A credit reporting body may use credit information it collects about you to pre-screen you for direct marketing at the request of a credit provider, unless you ask them not to. The credit reporting body uses this information to assess whether or not you are eligible to receive direct marketing from the credit provider. At any time you can ask a credit

reporting body not to do this.

9 QUALITY OF PERSONAL INFORMATION

We will take reasonable steps to ensure that any personal information we collect, use or disclose is accurate, complete, up-to-date and relevant to our functions or activities.

If you believe that your personal information is not accurate, complete or up to date, please contact the Privacy Officer in accordance with paragraph 16.1 of this policy.

10 ACCESS TO PERSONAL INFORMATION

10.1 Requesting access

You may at any time request access to personal information (including credit eligibility information) we hold about you. We will give you access to that information, unless an exception in the Privacy Act applies.

You can request access to your personal information by contacting our Privacy Officer in accordance with paragraph 16.1 of this policy.

10.2 Dealing with access requests

We will respond to a request for access within a reasonable time (usually 30 days), and give you access in the manner you request, if it is reasonable and practicable to do so.

We may need to verify your identity before we give you access to your personal information.

10.3 Access fees

Depending on the nature of the request, we may charge you a small fee to access that information.

10.4 Refusal to give access

If we refuse to give you access, we will:

- (a) take reasonable steps to give you access in a manner that meets our needs as well as yours; and
- (b) provide you with the:
 - (i) reasons for our decisions as required by the Privacy Act; and
 - (ii) mechanisms available to complain about the refusal.

11 ACCESS TO CREDIT ELIGIBILITY INFORMATION

11.1 Dealing with access requests

If you request access to credit eligibility information, we will:

- (a) take reasonable steps to provide you with an easy way to obtain access to the information;
- (b) provide you with access within 30 days of the request (unless unusual circumstances apply);
- (c) make the information clear and accessible;
- (d) provide reasonable explanations and summaries of the information; and
- (e) ask you to check with credit reporting bodies what information they hold about you to ensure that you have access to the most up-to-date information.

11.2 Refusal to give access

If we refuse to give you access to your credit eligibility information, we will give you a written notice that:

- (a) sets out the reasons for the refusal provided it is reasonable to do so; and
- (b) states that, if you are not satisfied with the response to the request, you may complain to the Office of the Australian Information Commissioner (**OAIC**).

12 CORRECTING PERSONAL INFORMATION

12.1 Requesting correction

If you think that any personal information we hold about you is incorrect, inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request us to correct the information by contacting the Privacy Officer in accordance with paragraph 16.1 of this policy.

12.2 Correcting information

We will take reasonable steps to correct that information.

12.3 Dealing with correction requests

We will respond to a correction request within a reasonable time (usually 30 days).

We may need to verify your identity before we correct your personal information.

12.4 Notification of correction to third parties

If we correct your personal information that we have previously disclosed to another

entity, and you ask us to tell the other entity about the correction, we will take reasonable steps to tell the other entity about the correction, unless it is impractical or unlawful to do so.

12.5 Refusal to correct information

If we refuse to correct the personal information, then we will provide you with the:

- (a) reasons for our decision as required by the Privacy Act; and
- (b) mechanisms available to complain about the refusal.

13 CORRECTION OF CREDIT INFORMATION

We are required to do some additional things if you ask us to correct credit information.

13.1 Dealing with correction requests

We will take reasonable steps to correct your credit information within 30 days (or such other period as you have agreed in writing).

13.2 Consultation

Where necessary to resolve the correction request, we will consult other credit reporting bodies or credit providers.

13.3 Correction

If we are able to correct your credit information, we will provide you with a written notice of the correction within 5 business days.

If we correct credit information we have previously disclosed to a third party, we will give each recipient of the information written notice of the correction within a reasonable time, unless it is impracticable or unlawful to do so.

13.4 Correction fees

We will not charge you a fee for making a request to correct information.

13.5 Refusal to correct

If we refuse to correct the credit information, we will provide you with a written notice that:

- (a) states that the correction has not been made;

- (b) sets out the reasons for the refusal; and
- (c) states that, if you are not satisfied with the response to the request, you may complain to the OAIC,

unless we are required by law or a court/tribunal order, not to give this notice.

14 ANONYMITY

You have the option to remain anonymous, or to use a pseudonym when dealing with us where it is lawful and practical to do so.

15 GOVERNMENT RELATED IDENTIFIERS

In certain circumstances we may be required to collect government-related identifiers such as your tax file number, Medicare number, Centrelink reference number, drivers licence number, passport number and individual healthcare identifiers.

We will not use or disclose this information unless the use or disclosure is permitted under the Privacy Act.

16 COMPLAINTS ABOUT PERSONAL INFORMATION

16.1 Complaints

If you:

- (a) have any issues about the way we handle your personal information after reading this policy;
- (b) become aware of a potential breach of privacy; or
- (c) wish to make a complaint,

please contact our Privacy Officer.

Complaints can be made in writing or orally to:

Privacy Officer

Telephone: (03) 6295 8111

Address: Level 13, 188 Collins Street, Hobart, TAS 7000

Email: yourprivacy@huonaqua.com.au

16.2 External complaint mechanism

If you are not happy with the outcome of the Privacy Officer's investigation or we have

not replied to you within a reasonable time, then you can raise your concern with the OAIC.

Complaints can be made to OAIC in the following ways:

OAIC in the following ways:

Office of the Australian Information Commissioner

Telephone: 1300 363 992

Email: enquiries@oaic.com.au

Postal: Office of the Australian Information Commissioner

GPO Box 5218 Sydney NSW 2001

Online: www.oaic.gov.au/privacy/making-a-privacy-complaint

17 ADDITIONAL CONSIDERATIONS FOR COMPLAINTS ABOUT CREDIT INFORMATION

17.1 Access and correction requests

If your complaint relates to how we have handled your access and correction requests, you may take your complaint directly to the OAIC.

17.2 Complaints about credit information

If you make a complaint about credit information (other than access or correction requests), we will give you a notice outlining how we will deal with it within 7 days.

17.3 Extensions of time

If a decision about the complaint cannot be made within 30 days, we will ask you for an extension of time to resolve the complaint.

A decision must be made in relation to the complaint within 30 days or longer period agreed to by you in writing. If you have any concerns you may complain to the OAIC.

Last updated in September 2018