



1. Purpose of this Privacy Policy

Wilmar recognises the need for privacy when it collects, stores, uses, discloses and handles Personal Information about its employees, customers, suppliers and other individuals that it deals with in the ordinary course of its business.

Wilmar respects the privacy of individuals and recognises the need to handle information about people responsibly and confidentially in accordance with its obligations under privacy law. Consistent with this position, Wilmar aims to protect the privacy of individuals by implementing and promoting practices which ensure compliance with this policy and its obligations under privacy law.

This Privacy Policy (**Policy**), outlines the way in which Wilmar collects, holds, uses, discloses and handles Personal Information. It also explains how to request access to and correction of Personal Information we hold, how to make a privacy complaint and how Wilmar will deal with such complaints.

When used in this Policy, the term "Personal Information" has the meaning given to it in privacy law. In general terms, it is any information about you where you are identified or reasonably identifiable. Your Personal Information may include your name, address, telephone number, email address and the kinds of products you like. In this Policy, 'Wilmar', 'we', 'us' and 'our' means Wilmar Australia Holdings Pty Ltd and each of its subsidiaries including amongst others Wilmar Sugar Australia Limited, Wilmar Sugar Pty Ltd, Wilmar BioEthanol (Australia) Pty Ltd, Sugar Australia Pty Ltd, New Zealand Sugar Company Limited and Wilmar Ingredients (Australia) Pty Ltd.

2. Collection and Handling of Personal Information

Wilmar may collect, store, use and hold Personal Information about:

- its employees;
- its contractors;
- its consultants;
- its customers;
- its growers;
- its suppliers;
- job applicants;
- other people who may come into contact with Wilmar or one of Wilmar's businesses; and
- people who visit its websites.

The information that we collect depends on the nature of your interactions with us. We generally collect Personal Information from you directly (when you provide your details to us), from you indirectly (for example, through our website) and from third parties in some instances (for example, to analyse traffic on our website and for marketing purposes).

The kinds of Personal Information Wilmar may collect includes a person's name, address, contact details, interest in areas of Wilmar's business, credit information, trading history and marketing information (including for the purposes of event registrations, competitions, donations and sponsorships).

If we are not able to collect your Personal Information, we may be partly or wholly unable to provide you with information, products or services and you may be unable to access and enjoy all the features of our websites.



2.1 Wilmar websites and cookies

By using our websites and services, or otherwise providing us with your information, you consent to us collecting, holding, using and disclosing your Personal Information as described in this Policy. While you can deal with us anonymously or using a pseudonym, if you do not provide the Personal Information that Wilmar has requested, Wilmar may not be able to provide you with our services or access to our website.

If you are a grower who has a Cane Supply Agreement (CSA) with Wilmar, your arrangements with Wilmar will be managed through a dedicated website managed by Wilmar. We will collect and manage Personal Information of growers for the purpose of Wilmar performing its obligations under the CSA and any associated agreements with the grower.

Our websites use cookies. A cookie is a small text file placed on your computer or mobile device when you visit a website. Cookies collect information about users of the website and their visit, such as their internet protocol (IP) address, how they arrived at the website (for example, through a search engine or a link from another website) and how they navigate within the website. We use cookies to facilitate your internet sessions, offer you services according to your preferred settings, track visitor use of our websites and to compile statistics about website activities.

You can set up your web browser to block cookies. You may also remove cookies stored from your computer or mobile device. However, if you do block cookies, you may not be able to use certain features and functions of our websites.

2.2 Other websites

Our websites may contain links to other websites which are not maintained by Wilmar. This Policy applies only to the Australian and New Zealand websites of Wilmar, and not third party websites.

3. Job Applicants and Employees

If you apply for a role with us or if you are an employee, we will collect and manage your Personal Information in different ways.

We may collect and hold the following additional kinds of Personal Information about applicants, employees and contractors where they are relevant to a role:

- recruitment-related information such as your resumé, your education and employment history, details of professional memberships and other information relevant to potential recruitment; and
- information necessary for us to manage and administer our employment or contracting relationship with you including date of birth, tax file numbers and other tax-related information, Australian Business Numbers, superannuation details, bank account details, health information that relates to your role, biometric data (e.g. fingerprint scans), gender, passport and visa details, working rights, emergency contact details, drivers licence details, performance and disciplinary information, location details of electronic devices that we have provided to you, entitlements and benefits and other relevant information.

If we are not able to collect your Personal Information, we may not be able consider your application for a role with us (for example, for employment, promotion or engagement as a contractor) or provide you with entitlements or benefits or otherwise administer our employment or contracting relationship with you.

We collect, use and disclose your Personal Information for the following purposes relating to your application for a role with us or your engagement with us as an employee or contractor:

- To consider your application for employment or engagement, to manage your employment or contracting



relationship with us (including to pay you any salary, fees or other entitlements or benefits);

- To verify your Personal Information such as your work and educational experience;
- To administer any training or education that you may require as part of your role and to assess your performance and provide you with performance feedback, including to undertake disciplinary action and related investigations if necessary;
- If you were unsuccessful in seeking a role with us, we may retain your Personal Information for a period in case another role arises for which you may be suitable; and
- To comply with our legal obligations including in respect of laws relating to tax, superannuation, employment and health and safety.

4. Use and disclosure of Personal Information

We may collect, hold, use and disclose Personal Information about you for the following purposes:

- to assist in providing information, goods and services to you;
- to send direct marketing materials and personalised communications via any medium including post, email, telephone or other forms of communication;
- for our internal administrative, marketing, planning, product development and research requirements including compiling and analysing statistics, preferences and trends;
- to assist with any enquiries, calls, requests or complaints you make to us;
- to allow you to use and enjoy our websites and apps and to administer, customise and improve our websites and apps for your use;
- to assist with restructuring or selling parts of our business; and
- other purposes permitted by law.

Depending on the product or service concerned, Personal Information may be disclosed to:

- Wilmar's related companies;
- industry stakeholders;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes;
- service providers, contractors and specialist advisers to Wilmar who have been contracted to provide us with administrative or other services including web hosting providers, IT systems administrators, mailing houses, delivery and logistic providers, payment processors, data entry service providers and electronic network administrators. These services include supporting the operation of our websites, apps and our business, fulfilling requests by you, managing our business or our relationship with you and otherwise providing services to you;
- professional advisors such as accountants, solicitors, business advisors and consultants;
- insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law;
- credit reporting or reference agencies or insurance investigators;
- any relevant authority that is entitled by law or otherwise authorised to receive it including regulators and



law enforcement bodies; or

- a person authorised by the individual who is providing his or her Personal Information.

Wilmar uses reasonable efforts to ensure that organisations outside Wilmar who, as a result of their relationship with Wilmar, handle or obtain Personal Information comply with privacy law.

4.1 Disclosure overseas

We may in some circumstances also disclose your Personal Information to the following overseas recipients:

- other members of the Wilmar International group;
- other companies or individuals who assist us in providing services or who perform functions on our behalf;
- anyone else to whom you authorise us (give us your consent) to disclose it; or
- anyone else where we are required or authorised by law to do so.

These overseas recipients may be located in Australia, New Zealand, Singapore or Malaysia.

5. Storage of Personal Information

Wilmar collects and holds Personal Information in hard copy and electronic form. Wilmar will make every effort to ensure that the Personal Information it holds is protected from misuse or unauthorised access, modification or disclosure, including by the implementation and enforcement of various security measures. Those measures include organisation and technical measures.

Wilmar may destroy or permanently de-identify Personal Information as required by law and Wilmar will not store Personal Information for longer than necessary. Where Wilmar no longer requires any Personal Information that Wilmar holds, Wilmar may destroy that Personal Information or remove details which may identify individuals.

6. Access and correcting your Personal Information

You may request access to any Personal Information we hold about you at any time by contacting us (using the details in the 'Contacting us' section below). You also have the right to ask us to confirm whether we hold any Personal Information about you and to ask us to correct that information. Before we provide you with access to your Personal Information, we may require some proof of identity. When contacting us to request access to or correction of any Personal Information we hold about you, we ask that you provide us with as much detail as you can about the information in question as this will help us to retrieve it.

Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by posting or emailing a copy to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making an access request and will not charge for making any corrections to your Personal Information.

There may be instances where we cannot grant you access to the Personal Information that we hold about you or are not required to do so. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal and set out any mechanisms available to you to complain about our refusal of your request.

If you believe that Personal Information we hold about you is incorrect, incomplete or inaccurate, then you may



request that we correct it. We will then consider if the information requires correction. If we do not agree that there are grounds for correcting your Personal Information, then (if you so request) we will add a note to the Personal Information stating that you disagree with it. We will not charge you for making a request that your Personal Information be corrected, for correcting your Personal Information or adding a note to the Personal Information stating that you disagree with it.

7. What is the process for complaining about a breach of privacy?

If you believe that we have breached your privacy, please contact us using the contact details below and provide details of the incident so that we can investigate it. We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and your complaint is resolved within a reasonable time.

We will deal with any complaint by investigating it and providing a response to you within a reasonable time, provided that we have all necessary information and have completed any investigation required. In some cases, we may need to ask you to put your complaint in writing so that we are sure that we understand it and may also need to ask you for further information or to verify your identity. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome.

If you are dissatisfied with the outcome in respect of your rights or requests, please contact us. Alternatively, you may take your complaint to the privacy regulator in your country.

8. Contact details

If you have any queries about your privacy, please contact our Privacy Officer, via the following details:

Wilmar Sugar Australia Limited
Level 22, 300 Queen St
Brisbane QLD 4000

Email: privacy@au.wilmar-intl.com.

9. Updates to our Privacy Policy

Wilmar may amend or vary this Policy from time to time and we will post the updates on our website.