

Privacy Policy

Stahmann Farms Enterprises Pty Ltd and its related bodies corporate (together “**Stahmann Webster Group**”) takes seriously the privacy of those that visit our website. We have established this Privacy Policy to communicate what information we collect and how that information is used and safeguarded. You will also find information about how to contact us if you have any questions about privacy issues including how to update or access your personal information or make a complaint.

1. Our obligations

Stahmann Webster Group is bound by privacy laws in Australia, including:

- the Australian Privacy Principles set out in the *Australian Privacy Act 1988* (“**Privacy Act**”); and
- the credit reporting provisions of the Privacy Act and the *Credit Reporting Privacy Code 2014* (collectively the “**Privacy Laws**”).

Terms not defined in this policy have the same meaning given to them under the applicable Privacy Laws.

2. What information is collected, and why?

When you visit our website, www.stahmannwebster.com.au, we collect information about the visit that does not identify you personally. We track information such as the domain from which you are visiting and your browser type. We also collect specific information regarding your session on our website. This includes items such as the date and time of the visit and the pages viewed.

The information we collect is information we consider necessary for our business activities and based on our relationship with you. The kinds of personal information collected by Stahmann Webster Group includes:

- **Enquiries or feedback:** information you give us including your name, contact details (such as phone, email or address), enquiry details, opinion of our products and records of your communications with us;
- **Supply:** information you give us if you supply a product or service to us, or we supply product or services to you;
- **Credit:** information necessary for us to process applications for credit including any personal guarantees, payment information and account login information;
- **Social media:** any information which you allow to be shared with us that is part of your public profile on a third party social network, or information you create and share with us by posting it to one of our social networks;
- **Recruitment and contractors:** information you give us if you apply for a job with us. For recruiting purposes and/or if we engage you as a contractor, it may be necessary for us to request sensitive information from you; and
- **Third parties:** generally speaking, we only collect personal information directly from you and our interactions with you in our business. We may obtain information from third parties, for example, businesses we acquire, and businesses we partner with for promotional purposes or third party institutions during consumer credit applications;

Sometimes we ask you to voluntarily provide personally identifiable information. This information generally includes, but is not limited to, your name, e-mail address, postal address, and telephone number. Wherever possible, Stahmann Webster Group collects personal information from the person concerned, but we may obtain information about a person from others. Collection of information via third persons may take the form of details held by:

- credit reporting bodies;
- organisations that Stahmann Webster Group has an arrangement with to jointly provide or offer products;

- related entities within the Stahmann Webster Group; or
- third party referrals.

Stahmann Webster Group does not collect any personally identifiable financial or health-related information. We do not intentionally collect information from children under the age of 13.

3. Collection of unsolicited Personal Information

From time to time Stahmann Webster Group may receive personal information from others which was not solicited. If Stahmann Webster Group receives unsolicited personal information, Stahmann Webster Group is required to determine whether it could have collected the information in accordance with Australian Privacy Principle 3 dealing with the collection of solicited information. If this requirement cannot be met, Stahmann Webster Group will destroy or de-identify the information, if it is lawful and reasonable to do so. However, if Stahmann Webster Group can satisfy Australian Privacy Principle 3, Stahmann Webster Group will retain the personal information and handle it in accordance with this Privacy Policy and the Australian Privacy Principles.

4. How do we manage and protect your Personal Information?

The personal information and credit information we collect from you may be stored in:

- Computer systems;
- Electronic databases;
- Digital archives;
- Telephone recordings; and
- Hard copy or paper files.

Privacy protection is an essential component of the operational requirements and business integrity at Stahmann Webster Group. We will take all reasonable steps to ensure that:

- personal information held in paper or electronic form is safe and secure and that it is protected from misuse, interference, loss, unauthorised access, modification or disclosure; and
- personal information is only used by employees or disclosed to other organisations to the extent necessary for Stahmann Webster Group's business purposes.

We will take all reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. The ways we do this include:

- Limiting access to our premises and the information we collect about you;
- Requiring any third party providers to have acceptable security measures to keep personal information secure;
- Putting in place physical, electronic, and procedural safeguards in line with industry standards (ie. firewalls, virus and intrusions detection etc); and
- Destroying or de-identifying personal information pursuant to the law and our record retention policies where relevant.

Our storage mechanisms may be managed in a number of ways. These may be managed or administered internally by Stahmann Webster Group and may be held locally in Australia, or, they could be managed by a third party storage provider with whom Stahmann Webster Group has a contractual relationship and be either managed locally or overseas.

5. How is the information used?

Non-personally identifiable information is collected to allow us to analyse how our website is used and to improve the content and service the website provides. Personally identifiable information is collected for analysis to improve the content of the website and the services we provide you.

Stahmann Webster Group owns the collected information and will not sell, trade or rent the information to others. We may use the information to continue contact with you. This may include contact such as follow-up calls, e-mail correspondence, or mail correspondence to follow-up on the contact.

Stahmann Webster Group may use and disclose your personal information and credit information for the following purposes:

- **Verification:** We may use and disclose personal information to verify your identity when engaging with us;
- **Offers:** We may use personal information to inform you about other products and services offered by us which we consider may be of interest to you;
- **Marketing:** We may use and disclose personal information for any marketing, promotional, publicity or direct marketing that we or others may undertake. However, we will not do this by email (except as part of an email which facilitates, completes or confirms a transaction with you, or provides updates regarding the products and services we provide) unless we have your consent. These emails will always include an “unsubscribe” facility (or further details on how to unsubscribe – see “How to opt out of correspondence” below);
- **Legal requirements:** We may disclose personal information to legal and accounting firms, auditors, contractors, consultants and other advisors for the purpose of administering, and advising on, our business and for associated actions, including third parties in some circumstances or mergers or acquisitions of our business;
- **Credit reporting:** If you apply for credit we will collect from you personal information and disclose your personal information (and other information you provide in connection with your credit application) to other credit providers, trade referees and credit rating service providers;
- **Service providers:** At times we may engage third party companies to provide support for our various business functions including website hosting, cloud based providers and promotional agencies. Information may be accessed by those providers if necessary and on the basis that they comply with this Privacy Policy; and
- **Other:** We may use and disclose personal information for any other use associated with such purposes or for which you have given permission.

6. Do we disclose your personal information overseas?

Where necessary for its business purposes, Stahmann Webster Group may disclose your personal information overseas, which may include transferring your information to our agents, business partners and service providers located outside Australia. We will take reasonable steps to ensure that any overseas recipients of personal information have appropriate safeguards to ensure the integrity and security of that information.

7. Credit reporting

Stahmann Webster Group provides certain goods and services to customers on commercial credit terms. Stahmann Webster Group may need to handle personal information about customer credit worthiness in connection with those arrangements (“**credit-related personal information**”). Note that other sections of this Privacy Policy are also relevant to credit-related personal information including dealing with access, correction, complaints, cross-border disclosures of personal information and how Stahmann Webster Group collects and holds personal information. Further Stahmann Webster Group may be subject to further obligations under the Privacy Act and to the extent applicable, the Privacy (Credit Reporting) Code (collectively, the “**Privacy Law**”), and this Policy is not intended to limit or exclude those obligations.

If you apply for customer credit with Stahmann Webster Group or you will be guaranteeing the obligations of a credit applicant, we may request a credit report about you from a credit reporting body (“**CRB**”). We use these reports to assess your application and ability to repay credit. To obtain these reports, Stahmann Webster Group will disclose credit related personal information so that the CRB can accurately identify you.

We may, to the extent permitted under the Privacy Law collect, hold and disclose any types of credit-related personal information about a person, including:

- (i) name, sex, date of birth, driver's licence number, employer name and three most recent addresses;
- (ii) the fact that the person has applied for credit and the amount and type of credit limit;
- (iii) confirmation of previous information requests to CRBs made by other credit providers, mortgage insurers and trade insurers;
- (iv) details of the person's credit providers;
- (v) start and end dates of credit arrangements and certain terms and conditions of those arrangements;
- (vi) permitted payment default information, including information about related payment arrangements and subsequent repayment;
- (vii) information about serious credit infringements (e.g. fraud);
- (viii) information about adverse court judgments;
- (ix) publicly available information about the person's credit worthiness;
- (x) certain insolvency information from the National Personal Insolvency Index; and
- (xi) any credit score or credit risk assessment indicating a CRB or credit provider's analysis of your eligibility for credit.

Where we have collected credit-related information about you from a CRB, we may use that information to produce our own assessments and ratings in respect of your credit worthiness. Stahmann Webster Group may exchange credit-related personal information with CRBs as may be permitted under the Privacy Law to:

- (i) assist CRBs to maintain information about you to provide to other credit providers in order for credit assessments to be undertaken;
- (ii) assess a credit application made by you or an application to be a guarantor;
- (iii) manage credit; and
- (iv) create assessments and ratings of your credit worthiness.

Under the Privacy Law, you have the right to request CRBs not to:

- use your credit-related personal information to determine your eligibility to receive direct marketing from credit providers; and
- use or disclose your credit-related personal information, if you have been or are likely to be a victim of fraud.

8. Are "Cookies" used on the website?

"Cookies" are small pieces of information that are placed on a web user's hard drive. We may use cookies to provide you with better service. Cookies are pieces of information that a website transfers to your computer's hard disk for record-keeping purposes. Cookies can make the website more useful by storing information about your preferences for a particular site. The use of cookies is an industry standard, and many major websites use them to provide useful features for their customers. Cookies in and of themselves do not personally identify users, although they do identify a user's computer. Most browsers are initially set to accept cookies. If you prefer, you can set your browser to refuse cookies. However, you may not be able to take full advantage of the functionality of the Stahmann Webster Group site if you do so.

9. Links to other websites

Stahmann Webster Group's website may contain links to other websites. Stahmann Webster Group neither controls nor endorses external sites and is not responsible for the content of such sites. This policy does not cover the privacy policies and data collection practices of non-Stahmann Webster Group websites.

10. How to opt out of correspondence

We are committed to full compliance with the *Spam Act 2003* (Cth). Based on the information you have provided, Stahmann Webster Group may send e-mail correspondence to you. By subscribing to our email communications, or otherwise providing us with your email address and/or mobile number, you consent to receiving emails which promote and market our products and services, or the products and services of others, from time to time.

Each correspondence will contain an easy means to opt out of further correspondence by utilising the corresponding “unsubscribe” or “opt out” facility. Once you have unsubscribed from our email communications, we will remove you from the corresponding marketing list as soon as is reasonably practicable.

11. How do you access your personal information and update it?

You can ask us for access to the personal information we hold about you. You can also ask us to update or change any personal information we hold about you, if that information is wrong, missing parts or out of date. You can also ask us to delete your personal information, which we will do unless we are legally required or otherwise permitted to continue storing your information.

If you wish to update or delete your personal information, please email us at marketing@stahmannwebster.com.au or call us on (07) 4699 9400. We will respond as quickly as possible. Please note that we may need additional time to respond to requests for large amounts of information.

12. How do you make a complaint?

We take your concerns seriously. If you have any concerns about privacy or the use or collection of your personal information by Stahmann Webster Group, please email us at info@stahmannwebster.com.au or call us on (07) 4699 9400. We will respond as quickly as possible and handle all complaints in a way that is fair and consistent. If you are not satisfied with our response, you can make a formal complaint with the relevant privacy regulator:

Australia:

Director of Compliance
Office of the Australian Information Commissioner
Phone: 1300 363 992
Mail: GPO Box 5218
Sydney NSW 2001

13. Updates to our Privacy Policy

It may become necessary for us to update the terms of this policy. We reserve the right to change this policy at our sole discretion and without notice. Your continuing relationship with us following any updates constitutes acceptance of this policy as amended.