



Introduction

DailyGrain Pty Ltd (**DailyGrain**) is a wholly-owned subsidiary of Co-operative Bulk Handling Limited (**CBH**).

CBH is committed to treating the personal information it collects in accordance with the Australian Privacy Principles outlined in the Privacy Act 1988 (Cth) (**Privacy Act**).

This Privacy Policy sets out how CBH handles personal information about you in a fair and responsible manner.

CBH may modify this Privacy Policy from time to time to reflect its current privacy practices.

A reference to “CBH” in this Privacy Policy means a reference to one or more members of the CBH Group which includes all of CBH’s 100%-owned subsidiaries such as DailyGrain.

What personal information does CBH collect and hold?

The type of personal information CBH collects and holds will depend on how you interact with CBH. CBH may collect personal information about you which allows CBH to carry on its business and provide services to you, including names, addresses, dates of birth, occupation, banking information, type of grain grown, amount of grain grown, interests, hobbies and similar information. CBH may also collect and hold credit information.

This information may be collected directly from you in a number of ways, for example, as a response to a request for information made by CBH, as part of any forms you may need to submit to CBH or during the process of entering into an agreement with CBH for the purchase or sale of goods and services.

Collection Statements

At or before the time CBH collects personal information, CBH will take reasonable steps to ensure that you are made aware of who CBH is, the purpose of the collection, the organisations to who CBH would usually disclose information as part of providing services to you, the fact that you are able to gain access to the information held about you and the main consequences for you if all or part of the information is not collected.

What sensitive information does CBH collect and hold?

In some circumstances CBH may have to collect sensitive information (as defined in the Privacy Act), specifically health information related to individuals who have been involved in an accident or incident on the CBH premises. CBH will not collect this sensitive information without the consent of the individual concerned and CBH will only retain that information as a record related to the accident or incident. With respect to sensitive information related to employees or potential employees CBH will only use the sensitive information contained in its employee records in a manner and for a purpose consistent with the employment or former employment (as the case may be) of the individual concerned.

How does CBH use personal information?

The primary purposes for which CBH collects and uses personal information are:

- providing you with services focused on the marketing, handling, optimisation, storage and transport of grain and oil seed;
- identifying people authorised to deal with grain entitlement;
- purchasing grain from you;
- providing you with grain you have purchased from CBH;
- maintaining records in relation to entitlement to grains, oilseeds and pulses;
- making payment to you and receiving payment from you;

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- measuring, developing and implementing products and services for you;
- activities and initiatives within the agriculture and transport industries; and
- studying the promotion and development of Australian agricultural resources.

CBH may also use personal information to provide you with industry and marketing information, benefits and offers. If CBH does use personal information in this way you will have the right to opt-out from receiving this information by following the details of any opt-out procedures contained within the material or by contacting CBH as outlined in this Privacy Policy.

You can also opt-in, that is you may elect to receive certain materials that CBH have available for distribution. Please see the CBH website for details of the information or promotional materials that you may elect to receive. If you do elect to receive certain materials and provide us with personal information to allow us to do so, we will not disclose that information.

When does CBH disclose personal information?

CBH only discloses personal information in accordance with the purpose for which it was collected, as permitted by law or otherwise with your consent which may at times be implied from your dealings with CBH. For instance, if you transfer grain owned by you and held within CBH to a particular marketer CBH is entitled to assume that you will want CBH to notify that marketer that you have transferred an entitlement to a specified portion of grain.

CBH may also disclose personal information in the promotion and development of Australian agricultural resources either internally or through consultants. Generally CBH will de-identify and aggregate any information provided to people or organisations external to CBH such that you cannot be identified. In addition, CBH will require any external service provider to maintain the confidentiality of that personal information.

Disclosure to overseas recipients

In general CBH does not provide any of your personal information to overseas recipients unless permitted by law. However, CBH may be required to disclose information to its related bodies corporate which are located overseas in jurisdictions currently including, but not limited in the future to, the United States, Japan, the Netherlands and Hong Kong.

It is possible that you may also elect to transact with a foreign entity registered in and doing business in Australia. In those circumstances, where CBH provides information to that entity as expressly or impliedly authorised by you, it is possible that the information may be transmitted overseas. CBH is not able to specify the countries to which that information is transmitted and you should check the privacy policy of any party with which you are transacting.

CBH may use cloud computing solutions or data storage located overseas, in which case information may be stored under the control of CBH on computer servers located outside of Australia. Where this occurs it is predominantly located in the United States of America and Canada.

Cookies and Beacons

CBH may store some information (**cookies**) on your web browser. This is to enable you to view and log in to all CBH services, to allow CBH to tailor services to individual preferences and to save you time if you visit the site again. They may also help CBH study the browsing patterns of website users and improve the website design and content.

Most internet browsers allow you to set them to warn you before a cookie is stored or block cookies altogether. If you decline some cookies it may impede your ability to properly view or log into all the facilities on the website.

How does CBH manage my credit information?

CBH may collect your credit information as part of a credit application form submitted by you in the course of doing business with CBH, for example as part of the Pre-Pay Advantage Application. CBH may ask for your information (for example, name, address, statement of assets and liabilities) in order to allow CBH to conduct a commercial credit check to determine your credit eligibility.

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CBH may disclose your credit information to the credit reporting body with whom it works, which is www.veda.com.au.

CBH does not disclose your credit information to third parties located overseas.

You can access your credit information, seek to correct your credit information or make a complaint as outlined in this Privacy Policy.

How does CBH keep your personal information secure?

Once CBH receives your personal information it takes reasonable steps to keep your personal information secure and protect it from unauthorised access, modification, disclosure, loss and misuse.

CBH implements both physical and technological security measures to protect personal information. Physical measures include secure storage and use of security passes to access the CBH office while technological security measures include firewalls, the use of encryption and passwords and restriction of access to personal information unless necessary for the uses outlined in this Privacy Policy.

However, CBH cannot guarantee that any information that can be accessed or transmitted on the internet is entirely secure. Ultimately you are solely responsible for keeping your passwords and/or account information confidential and you should be careful and responsible whenever you are online.

CBH retains your personal information only for as long as necessary to fulfil the purposes for which the information was collected, as required by law or in accordance with CBH records management procedures.

How do I access my personal information?

If you believe that CBH has personal information relating to you please send your enquiry to:

[post]	CBH Privacy Officer Gayfer House 30 Delhi Street WEST PERTH WA 6005
[fax]	(08) 9322 3942
[phone]	(08) 9237 9600
[email/web option]	privacy@cbh.com.au

CBH will investigate whether it holds any relevant information on you, and if so, notify you of the types of information that it holds. CBH will endeavour to respond to you as quickly as is reasonably possible, but in any event will ensure that you have a response within 30 days of your request, including any reasons for refusing to allow access to all, or part, of the personal information.

CBH may be entitled to withhold all or some of the information from you where it considers that:

- to provide access would:
 - in the case of personal information, pose a serious and imminent threat to the life or health of any individual; or
 - in the case of health information, pose a serious threat to the life or health of any individual;
- to provide access would have an unreasonable impact upon the privacy of other individuals;
- the request for access is unreasonable or frivolous;
- the information relates to existing or anticipated legal proceedings between CBH and you and the information would not be accessible by the process of discovery in those proceedings;
- providing access would reveal CBH's intentions in relation to negotiations with you and would prejudice those negotiations;
- providing access would be unlawful, likely to prejudice an investigation of possible unlawful activity, or likely to interfere with the administration of the law or impact on related matters (for example, where an enforcement body has lawfully requested CBH do not disclose the information for national security reasons); or
- the provision of the information would reveal a commercially sensitive decision making process. In these circumstances CBH may provide an explanation for the commercially sensitive decision rather than direct access to the information.

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Costs

CBH will not charge you for making a request for access to personal information. However, CBH may, at its discretion, charge you for the reasonable costs incurred in providing you access to that information (for example, staff costs in searching for, locating and retrieving the information, copying and sending the information, etc.).

How do I correct personal information?

If, following access to personal information stored by CBH, you consider that the information is incorrect, you may ask CBH to correct the information. CBH will respond to any such request within a reasonable time. If CBH refuse to amend the information stored it will provide you with the reasons for its refusal, unless it would be unreasonable to provide those details (for example, where providing reasons would prejudice an investigation of unlawful activity or enforcement action by an enforcement body).

How do I make a complaint?

If you are unhappy with the decision:

- to refuse access to personal information; or
- to refuse to correct the personal information,

you may advise CBH in writing and CBH will respond within a reasonable timeframe. If you are still unhappy with the decision you may make a complaint to the Australian Information Commissioner or to a recognised external dispute resolution scheme of which you are a member.

Contact details for the Australian Information Commissioner are:

Office of the Australian Information Commissioner

Website: www.oaic.gov.au

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Links

The CBH website may contain links to other websites and those third party websites may collect personal information about you. CBH are not responsible for the privacy practices of other businesses or the content of websites that are linked to the CBH website. CBH advises you to read the privacy statements of each and every website that you access through the CBH website.