



PRIVACY POLICY

Mackay Sugar Limited ("Mackay Sugar") is committed to complying with the Australian Privacy Principles as provided for in the federal Privacy Act 1988 to govern the way in which we manage the personal information collected through our normal business interactions. This Privacy Policy applies to Mackay Sugar employees who are involved in the management of personal information and to those individuals and entities with whom we do business. The policy sets out how we collect, use, disclose and otherwise manage this personal information.

What is Personal Information? - Personal Information is defined in the Act as being information or an opinion about an individual whose identity is apparent or can reasonably be ascertained from that information or opinion.

Mackay Sugar may collect, store, use and hold personal information from growers, employees, contractors, consultants, customers, suppliers, job applicants and visitors to our website.

What sort of information do we collect? - The personal information we collect will vary depending on the circumstances, but in all cases we will only collect information about you which is relevant to our business relationship with you. For example, we may collect your name, gender, address, phone number, or any other information about our interaction with you and other relevant details that will assist in our business dealings and associated business development. Mackay Sugar may collect more specific information from employees, contractors, consultants, customers, suppliers and other persons who work in Mackay Sugar's workplace such as their date of birth, bank account details, tax file number and taxation information, work history, health history, emergency contact details, references, superannuation information and contract specific information.

How do we collect personal information? - Mackay Sugar collects information in various ways, including directly from you through dealings in person or via the telephone, as well as through normal business correspondence, online dealings, completion of business-specific forms (e.g. job applications, grower details forms, creditor data forms) and occasionally through third-parties such as recruitment agencies or other agents or representatives.

How is online privacy managed? - You can generally browse Mackay Sugar's website without telling us who you are or revealing any personal information about yourself. When browsing or searching our site, our server automatically collects navigational data to help us improve our website content and navigation. One way which navigational data is collected is by placing "cookies" in your browser file on your hard drive. Cookies do not capture or track any personal information and cannot identify you as an individual. You can usually modify your browser to prevent this happening.

Sometimes our website contains links to third party websites for your convenience and information. When you access a third party website, please understand that we are not responsible for the privacy practices of that site. We suggest that you review the privacy policies of each site you visit.

The Internet is not a secure environment as data transmission over the internet or any wireless network cannot be guaranteed to be 100% secure. If you use Mackay Sugar's website to send us any information (other than for the purposes of applying for a job), you acknowledge that:

- a. there are security and privacy limitations of the Internet which are beyond our control;
- b. the security, integrity and privacy of any and all information and data exchanged between you and us through our website cannot be guaranteed; and
- c. such information and data may be viewed or tampered with in transit by a third party.

How do we use personal information? - In general, Mackay Sugar collects and uses personal information to enable us to carry out our various business activities such as our day-to-day operations and maintaining our employee, grower, customer, supplier and community relationships. We may also collect information for statistical analysis and monitoring, payment for goods and services, communication (e.g. Newsletters), and responding to enquiries or complaints.

We will not use the information for any other purpose unless this is disclosed when we collect the information.

We endeavour to make sure that the personal information which we hold is accurate, complete and up to date. If we are notified that the information we hold is not accurate, complete or up-to-date, we will take steps to ensure that it is corrected or the changes to the information are noted.

Do we disclose personal information to others? - Mackay Sugar will only disclose personal information to a third party where we have consent to do so or the disclosure is permitted or required by law. For example, we may disclose information to:

- External service providers, such as contractors, consultants or suppliers, auditors, taxation and legal advisers who we may engage. These service providers are only permitted to use the information for the services or function for which they have been engaged; and
- Regulatory bodies, government agencies and law enforcement bodies, such as the Australian Tax Office.

What do we do to keep personal information secure? - We take all reasonable steps to protect personal information (both physical and electronic) from misuse, loss and unauthorised access, modification or disclosure using physical, electronic and procedural safeguards. We destroy or delete personal information if it is no longer needed for the purposes for which it was collected or if we are no longer required by law to retain it, using secure methods to destroy or de-identify the information. Hard copy documents are properly disposed of and all electronic information is deleted from our systems.

If a data breach occurs, such as if personal information that we hold is subject to unauthorised loss, use or disclosure, we will respond in line with the Office of the Australian Information Commissioner's [Data breach notification – A guide to handling personal information security breaches](#). We will aim to provide timely advice to you to ensure you are able to manage any loss – financial or otherwise – that could result from the breach.

Do we allow access to personal information? - In most circumstances, Mackay Sugar allows you to access the personal information we hold about you. However, there are exceptions to this right so that access may be denied where we feel that making the information available:

- Would reveal a commercially sensitive decision making process;
- Would reveal personal information about another person; or
- We are legally prevented from disclosing.

Mackay Sugar will require you to verify your identity prior to providing or amending any personal information. Where personal information is not readily accessible due to our back up and archiving processes, we may charge you for the cost of providing this access. We may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we will provide you with a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).

Do we disclose personal information overseas? - Mackay Sugar engages several providers whose servers may be located overseas. This means that in some instances, your information may be stored on these providers' overseas cloud-based servers. Mackay Sugar has taken reasonable steps to ensure that your personal information will not be held, used or disclosed by these providers in any manner which does not comply with the Australian Privacy Principles.

What is our procedure for handling privacy enquiries? -

Any questions, complaints or enquiries relating to our Privacy Policy, practices or procedures, including requests for access to personal information or amendments to information, should be directed to the Company Secretary:

By Post:	PO Box 5720, Mackay Mail Centre Qld 4741
By phone:	07 4953 8241
By fax:	07 4953 8340
By email:	d.rasmussen@mkysugar.com.au



Executive Chairman & Managing Director
Mark Day
2 February 2018

More information

For more information about privacy in general, you can visit the federal Information Commissioner's website at www.oaic.gov.au.