

Privacy Policy

This privacy policy (the **Policy**) sets out in accordance with the Privacy Act 1988 (Cth) (**Privacy Act**) the way in which Viterra Operations Pty Ltd and its associated entities (together **Viterra, We or Our**) may collect, store, use, manage and protect your Personal Information.

By:

- (a) using the Viterra website;
- (b) accessing, requesting, enquiring about, ordering or purchasing Viterra's products and services (either online or in person);
- (c) entering into agreements or other contracts with Viterra; or
- (d) providing Personal Information to Viterra, its officers, agents or employees,

after this Policy has been brought to your attention, you acknowledge and consent to the use, collection, storage or disclosure of your Personal Information by Viterra in accordance with this Policy and the Privacy Act.

If you **do not** agree to Viterra handling your Personal Information in the manner set out in this Policy you must immediately cease to access our website, our applications or our products and services, and you should not provide Viterra with any of your Personal Information.

1. WHAT IS PERSONAL INFORMATION?

We follow the definition of Personal Information given in the Privacy Act as *being*:

... information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

Generally words and phrases in this Policy are used in accordance with or as they are defined in the Privacy Act.

2. WHAT KINDS OF PERSONAL INFORMATION MIGHT WE COLLECT AND HOLD?

We may collect (and hold) different Personal Information from you depending upon how you interact with Viterra.

If you access our website or applications, we may collect information about how you have used our site, including but not limited to:

- Internet Protocol 'IP' address;
- device ID;
- MAC address;
- browser information;
- installed software;
- hardware type;
- access date and time; and
- length of session time.

If you access our applications we may also collect information about how you have used our applications, including but not limited to:

- application usage data; and
- interaction with other applications.

If you contact Viterra, or if you provide services to Viterra, we may collect:

- your name;
- your address;
- your e-mail address;
- your phone number;
- location, geographical and geo-tagged information;
- your contact details;
- details about your cropping area;
- details of your crop type; and
- your Drivers Licence or permits or other identification or documentation relating to your skills and qualifications.

If you attend any of our facilities or offices, we may use Closed Circuit Television Cameras and other photographic equipment to record:

- your image;
- the date and time of your attendance; and
- your actions whilst at the relevant site.

We may also collect information about:

- your demographic;
- your interests; and
- your purchases of products and services related to our activities.

3. HOW DO WE COLLECT PERSONAL INFORMATION?

We collect Personal Information:

- directly from you (when we contact you, when you contact Viterra, when we communicate with you, when

you visit one of our facilities or offices, when you post about Viterra on social media, attend an event we have organised or sponsored, or when you complete a survey); and

- from third parties who you have authorised to provide Viterra with information.

4. HOW DO WE HOLD AND SECURE YOUR PERSONAL INFORMATION?

We store your Personal Information using various methods such as hard copy format, digitally, on site, and with third party storage providers. All hard copy material is secured using industry accepted methods. All digital material is secured using secure company IT systems. Any digital transfer of Personal Information is secured using a range of secure methods including but not limited to encryption.

Viterra uses, or may in the future use, data storage providers located both inside Australia, and overseas as indicated in section 11. Where appropriate, Viterra has agreements with its storage providers to keep all Personal Information they store secure, using reasonable and appropriate security methods.

If you provide any personal information to Viterra via an online service or application, or if we provide information to you by such means, the privacy, security and integrity cannot be guaranteed during its transmission unless we have indicated to you beforehand that a particular transaction or transmission of information will be protected (for example by encryption).

5. WHY DO WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION?

Viterra may collect Personal Information for a number of reasons or purposes, including:

- establishing and maintaining a responsible commercial relationship with you;
- providing you with products or services;
- understanding your needs and preferences and/or determine your eligibility for products, services, loyalty programs, rebates and/or promotions;
- providing you with information about our products or services;
- developing, enhancing, refining or marketing products or services;
- managing and developing our business, operations and planning;
- providing you with marketing material;
- contacting you in relation to our business activities;
- better understanding our clients and customers;
- tailoring our marketing, services, promotions and operations;
- enabling Viterra to meet legal and regulatory requirements
- working with Government and non-Government departments to assist with research and the discharge of legislative functions; and
- corporate governance, auditing and record keeping.

Our use of Personal Information may extend beyond these uses, but will be restricted to purposes that we consider to be related to our functions and activities.

6. WHAT DO WE DO WITH YOUR PERSONAL INFORMATION?

If we collect Personal Information from you, we may:

- use that information for any of the reasons or purposes in section 5 of this Policy;
- store that information in accordance with this Policy;
- share that information amongst our subsidiaries and entities we work with, including our joint venture partners;
- pass that information to third parties who provide products or services to Viterra (including our accountants, auditors, lawyers, insurers, IT contractors, regulators and end point royalty managers); or
- provide that information to third parties as required by law.

7. DO YOU USE MY INFORMATION FOR DIRECT MARKETING?

We may use your Personal Information to communicate directly with you to promote a product or service (**Direct Marketing**). We use Direct Marketing to provide you with information about products or services that we believe you may be interested in. If you receive Direct Marketing material from Viterra, and do not wish to continue receiving it, please contact Viterra by any of the methods set out in section 17, below, asking to be removed from all future Direct Marketing programs. Once we have received your opt-out request, we will remove you from our Direct Marketing programs as soon as reasonably practicable.

8. WHAT ABOUT COOKIES?

When you access our website, we may receive information about you via a 'cookie'. A cookie is a piece of information that our web server may send to your computer when you visit the website. The cookie is stored on your machine, but does not identify you or give Viterra any information about your computer. A cookie helps Viterra to recognise when you re-visit the website, and to optimize your experience. We do not collect any Personal Information from you when you use cookies on our website.

9. WHAT ABOUT LOCATION DATA?

Viterra may collect and process your location data to provide location related services. The location data is processed and stored only for the duration that is required for the provision of the location related services.

Viterra may use, depending on the service:

- IP-based location based on the IP address presented by the end-user;
- fine geo-location data based on coordinates obtained from a mobile device's GPS radio; or
- coarse, network-based geo-location data based on proximity of network towers or the location of WiFi networks.

Fine GPS-based geo-location data is not accessed without your consent. Viterra will not share GPS geo-location with third parties without your consent unless required by law. To the extent that Viterra makes available GPS geo-

location to third parties in accordance with this Policy, it will be provided anonymously.

10. DISCLOSURE OF PERSONAL INFORMATION TO OTHER ORGANISATIONS

Viterra may disclose your personal information to:

- certain contractors or subcontractors of ours that provide administrative or promotional services to Viterra, for example, mail processing businesses, printers, or market research companies. We seek to enter into contractual agreements with these organisations to ensure that information we disclose is used only for the limited purposes for which we have provided it;
- our related company Glencore Agriculture Pty Limited, and its subsidiaries. Any information provided to Glencore Agriculture Pty Limited will be handled in accordance with this Policy;
- our parent company Glencore plc which is based in Switzerland. Any information provided to Glencore plc will be handled in accordance with this Policy;
- National Grower Register Pty Ltd or its agents.

11. DO WE EVER SEND YOUR INFORMATION OVERSEAS?

Viterra's operations are conducted primarily within Australia. Viterra does, however, at times pass information to Glencore plc, a Switzerland based company that controls Viterra. Glencore plc has a Privacy Policy which is governed by the laws of Switzerland.

We will take reasonable steps to ensure that any Personal Information that we provide to Glencore International plc, or any other overseas third party, is treated appropriately.

12. NATIONAL GROWER REGISTER

Viterra may obtain certain information about you from the National Grower Register (**NGR**), a centralised database of contract and payment information for grain producers and traders, which is operated by National Grower Register Pty Ltd.

If we collect information in this manner, we will treat that information in accordance with the NGR Privacy Statement, a copy of which is available at www.ngr.com.au. As a user of the NGR, Viterra is required to comply with the NGR Privacy Statement.

13. HOW DO WE DEAL WITH SENSITIVE INFORMATION?

If you have enquired about or applied for a job or position with Viterra, we may collect (and hold) Sensitive Information, which may include health information, about you. Sensitive Information will be collected for the purpose of pre-employment assessment and only with your consent.

By providing or enabling Viterra to collect Sensitive Information to us, you consent to our collection, use and storage of that information for the purpose of conducting a pre-employment assessment.

If we wish to use your Sensitive Information for any secondary purpose we will only do so with your consent.

Viterra will not disclose your Sensitive Information for the purpose of direct marketing without your consent.

14. CAN YOU ACCESS YOUR PERSONAL INFORMATION OR REQUEST THAT IT BE CORRECTED?

- You may request access to the Personal Information that we hold about you by contacting Viterra by any of the methods as set out in section 17 (an **Access Request**).
- Upon receiving an Access Request we may request further details from you to verify your identity. We reserve the right not to provide you with access to Personal Information if we cannot verify your identity to our reasonable satisfaction.
- An administrative fee may be charged to cover our costs in providing you with access to your Personal Information. This fee will be explained to you before it has been incurred.
- We will respond to your Access Request within a reasonable period of time by:
 - providing you with access to your Personal Information;
 - rejecting your Access Request, and providing you reasons for this rejection.
- Access Requests may be denied where:
 - we believe your request is frivolous or vexatious;
 - we are entitled to reject it by law;
 - we are unable to verify your identity; or
 - you have not paid the administrative fees referred to in paragraph 10c, above.
- If you believe that the Personal Information that we hold is inaccurate or otherwise requires correction, you may send Viterra a correction request by contacting Viterra by any of the methods as set out in paragraph [17], below. We will review your Personal Information and respond to the request within a reasonable period of time.

15. WHAT HAPPENS IF YOU WANT TO DEAL WITH VITERRA ANONYMOUSLY OR USING A PSEUDONYM?

You can deal with Viterra either anonymously or by using a pseudonym if you choose. If, however, you do so we may not be able to provide you with accurate or useful information, and you may not be able to access a full range of our products and services.

16. DOES THIS POLICY EVER CHANGE?

From time to time we may make changes to this Policy. When we do, we will highlight those changes in **bold**. Changes come into effect from the time when they are brought to your attention, or when you next log on to our website, whichever is earlier. You should review the Policy each time you visit our website to keep up to date on any changes.

17. WHAT HAPPENS IF YOU HAVE A QUESTION OR COMPLAINT ABOUT HOW WE HAVE HANDLED YOUR PERSONAL INFORMATION?

If you have a question or complaint, you can raise it with Viterra by:

Emailing; privacy@viterra.com

Calling Viterra on 1800 018 205; or

Sending a letter to: Level 1, 186 Greenhill Road, Parkside, SA 5063.

We take all complaints seriously and will respond to you within a reasonable period of time, unless we consider your complaint to be frivolous or vexatious.

Complaints will be dealt with in accordance with our standard Complaints Procedure Policy.

If you aren't satisfied with the way we have handled your complaint, you can make a complaint to the Office of the Australian Information Commissioner at <http://oaic.gov.au>.