

# Privacy Management Plan

## Control

<b>Policy Name:</b>	Privacy Management Plan		
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<b>Policy Owner:</b>	Company Secretary & Legal Counsel	<b>Next Review:</b>	December 2021

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## 1. Introduction

- 1.1 SRA collects, stores, uses and discloses a range of personal information for the purposes of:
- (a) providing products and services to interested stakeholders;
  - (b) communicating and providing information to interested stakeholders;
  - (c) maintaining relationships with suppliers and contractors and where appropriate obtaining copies of their privacy management plans and policies to ensure their compliance with APPs and the Privacy Act (if applicable);
  - (d) undertaking its business as usual functions, including the fulfilment of any legal requirements;
  - (e) facilitating the exchange and sale of SRA sugarcane varieties;
  - (f) evaluating its business with the view to enhancing and/or developing new features, products and/or services; and
  - (g) undertaking any other relevant activities and functions, including conducting sugar research, development and adoption.
- 1.2 SRA is committed to ensuring that the personal information it collects, stores, uses and discloses is handled in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) including the Australian Privacy Principles (**APPs**). SRA understands that personal information is a valuable asset and SRA's privacy values are reflected in, and supported by, the way it does business.

## 2. Purpose

- 2.1 The purpose of this Privacy Management Plan (**PMP**) is to provide a framework that sets out how SRA will meet its obligations under the Privacy Act, including the APPs, in respect of its handling of personal information.

## 3. Application

- 3.1 This PMP applies to all business undertaken by SRA, or on SRA's behalf.
- 3.2 All officers, employees and contractors of SRA must comply with this PMP.

## 4. Privacy Obligations

- 4.1 SRA is an organisation that is an APP entity for the purposes of the Privacy Act. As such, SRA must comply with the Privacy Act, and in particular, the APPs at Schedule 1 to the Privacy Act. The APPs set out specific obligations that APP entities must meet when collecting, storing, using and disclosing personal information.
- 4.2 Personal information is defined in the Privacy Act as *“any information or an opinion about an identified individual, or an individual who is reasonable identifiable whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.”*

- 4.3 In respect of the handling of personal information, SRA will, at a minimum:
- (a) Take a 'privacy by design' approach, meaning that SRA will consider privacy compliance throughout the lifecycle of all projects and processes. If a project or process involves a significant change in the way that SRA handles personal information, SRA will consider whether it is necessary to undertake a Privacy Impact Assessment (**PIA**).
  - (b) Publish and maintain a Privacy Policy on its website, which will clearly notify individuals of how SRA will collect, store, use and disclose personal information, and notify individuals of how they may seek access to, or correction of, their personal information. This Privacy Policy will be reviewed by the Privacy Officer regularly (no less than every 2 years).
  - (c) Ensure that SRA's operates in a manner consistent with its requirements under the APPs, including by:
    - (i) only collecting personal information which SRA reasonably requires for its functions and activities;
    - (ii) only using and disclosing personal information for the purpose for which it was collected, unless SRA is satisfied that the use or disclosure is permitted by the Privacy Act;
    - (iii) ensuring that reasonable steps are taken to ensure personal information is stored securely and protected from unauthorised access; and
    - (iv) ensuring that individuals can access and correct their personal information in accordance with their rights under the Privacy Act.
- 4.4 SRA will ensure that it will comply with obligations in relation to notifiable data breaches under Part IIIC of the Privacy Act (**NDB Scheme**), by maintaining and implementing a Data Breach Response Plan which requires SRA to:
- (a) identify, contain, escalate, assess and respond to potential and actual data breaches in a timely manner, in accordance with the relevant timeframes in the NDB Scheme;
  - (b) proactively help mitigate and remediate potential harm to affected individuals;
  - (c) document its data breach processes and responses;
  - (d) identify staff roles and responsibilities and reporting lines in the event of a potential or actual data breach; and
  - (e) ensure ongoing compliance with its security obligations in respect of personal information.

## 5. Privacy Officer

- 5.1 The Chief Executive Officer of SRA will appoint a Privacy Officer who will ensure that SRA complies with the Privacy Act and the APPs, this PMP and the Privacy Policy.
- 5.2 The Privacy Officer will have the responsibilities set out in the table at section 6.2 below.

## 6. Roles and Responsibilities

- 6.1 All officers, employees and contractors of SRA are expected to comply with this PMP and any privacy training or guidance provided to them from time to time.
- 6.2 The following table sets out key roles and responsibilities:

Role	Responsibility
Board	<ul style="list-style-type: none"> <li>• Reviewing and approving this PMP.</li> <li>• Reviewing and approving SRA's Privacy Policy.</li> <li>• Reviewing and considering reports from the Privacy Officer regarding compliance with this PMP, the Privacy Policy, other privacy-related documents and with the Privacy Act, APPs and any other applicable privacy legislation.</li> </ul>
Chief Executive Officer	<ul style="list-style-type: none"> <li>• Overall responsibility and accountability for implementing this PMP.</li> </ul>
Company Secretary and General Counsel	<ul style="list-style-type: none"> <li>• Ensuring that this PMP is reviewed annually.</li> <li>• Reporting to the Board and/or relevant Board Committee in relation to progress against this PMP and SRA's compliance with the Privacy Act, APPs and any other applicable privacy legislation.</li> </ul>
Executive Managers and Managers	<ul style="list-style-type: none"> <li>• Providing direction and guidance within their areas of accountability to ensure that this PMP is adhered to by any employees or contractors reporting to them.</li> <li>• Reporting to the Privacy Officer any complaints relating to privacy related matters or access to personal information.</li> <li>• Liaising with the Privacy Officer as necessary in relation to matters arising under this PMP.</li> </ul>
Employees	<ul style="list-style-type: none"> <li>• Reporting to the Privacy Officer any complaints relating to privacy related matter or access to personal information;</li> </ul>
Privacy Officer	<ul style="list-style-type: none"> <li>• Managing requests by individuals for access to and/or correction of their personal information held by the SRA, in compliance with APPs 12 and 13.</li> <li>• Managing internal and external privacy enquiries and complaints.</li> <li>• Ensuring that SRA complies with this PMP and SRA's Privacy Policy.</li> <li>• Providing input into related policies that require privacy consideration.</li> <li>• Answering questions about this PMP, or about SRA's privacy obligations more generally, from SRA personnel or stakeholders, or the general public.</li> <li>• Reporting to the Chief Executive Officer, Board and/or the Company Secretary in relation to the development, review and implementation of this PMP, the Privacy Policy and any collection notices.</li> <li>• Maintaining a record of the personal information held by SRA.</li> <li>• Assisting with the preparation of any Privacy Impact Assessments.</li> </ul>

## 7. Training

- 7.1 Privacy training will be included in all induction programs. This training will cover the privacy responsibilities of officers, employees and contractors of SRA and will also cover the key points of this PMP.
- 7.2 SRA will also ensure that all staff with access to personal information as part of their role at SRA are required to undertake privacy training on an annual basis.

## 8. Review

- 8.1 The Privacy Officer must ensure that the following documents are regularly reviewed, considered and approved by the Board and the Chief Executive Officer:
- (a) this PMP;
  - (b) the Privacy Policy;
  - (c) any collection notices being used by SRA; and
  - (d) all of SRA's internal privacy-related policies and processes (e.g. its processes for ensuring that personal information is protected from misuse and harm).
- 8.2 Additionally, the Privacy Officer must monitor compliance with this PMP and any associated documents on an ongoing basis. The finding of these reviews should be provided to the Board and the Chief Executive officer prior to the annual review of the PMP in accordance with section 8.1 above.
- 8.3 The Privacy Officer must ensure that the review process, and SRA's ongoing compliance with the PMP and related documents are documented in writing.

## 9. Definitions

Term	Definition
<b>Australia Privacy Principles or APPs</b>	means the Australian Privacy Principles at Schedule 1 to the Privacy Act, as amended from time to time.
<b>personal information</b>	means 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 (see section 6 of the Privacy Act).
<b>PMP</b>	means this Privacy Management Plan.
<b>Privacy Act</b>	means the <i>Privacy Act 1988</i> (Cth), as amended from time to time.
<b>Privacy Impact Assessment</b>	means a systematic assessment of a project that identifies the impact that the project might have on the privacy of individuals, and sets out recommendations for managing, minimising or eliminating that impact.
<b>Privacy Officer</b>	means the individual holding that role, as appointed by the Chief Executive Officer from time to time.

<b>Privacy Policy</b>	means SRA's privacy policy, made available to the public on its website at <a href="http://www.sugarresearch.com.au">www.sugarresearch.com.au</a> .
<b>SRA</b>	means Sugar Research Australia Limited ABN 16 163 670 068.