

# PRIVACY POLICY

## 1 INTRODUCTION

Sugar Research Australia Limited (**SRA, we, us, our**) invests in, and manages, a portfolio of research, development and adoption projects that drive productivity, profitability and sustainability for the Australian sugarcane industry.

Your privacy is important to us. We are committed to ensuring that your personal information is collected, held, used and disclosed in accordance with applicable Australian privacy laws.

This Privacy Policy is intended to give you a greater understanding of how and why we collect, hold, use and disclose your personal information, and the steps that we take to protect your personal information. It also provides information about how you can access or seek correction of your personal information, and how you may make a complaint regarding our handling of your personal information.

This Privacy Policy applies to our collection, use and disclosure of your personal information (including via our website at [www.sugarresearch.com.au](http://www.sugarresearch.com.au) (**our website**)) and does not apply to the collection, use and disclosure of your information by any third parties.

## 2 PRIVACY ACT 1988 (CTH)

We are subject to the *Privacy Act 1988* (Cth) (**Privacy Act**) and the requirements of the Australian Privacy Principles (APPs), as set out in Schedule 1 of the Privacy Act (as amended from time to time). A copy of the APPs can be accessed from the Office of the Australian Information Commissioner (**OAIC**) at [www.oaic.gov.au](http://www.oaic.gov.au).

The APPs regulate, amongst other things, how we can collect, hold, use and disclose personal information, and how you can access and correct that information.

In some circumstances, records held by us in relation to current and former employees are exempt from the APPs.

## 3 WHAT IS PERSONAL INFORMATION?

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

## 4 WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

We only collect personal information that is reasonably necessary for us to undertake our functions and activities. These include matters described on our website from time to time.

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The types of information we collect will depend on the type of activity or function. We generally collect and hold personal information about:

- contractors who provide services to us;
- our customers;
- our suppliers;
- job applicants; and
- other people and businesses who we may work with.

The types of personal information we collect varies, depending on the purpose for collection and your interaction with us. The information we collect may include:

- your name;
- your contact details, including your address, phone/fax numbers and/or email address;
- information about your financial affairs (e.g. payment details, bank account details and information about business and financial interests);
- information about your identity (e.g. date of birth, country of birth, passport details, visa details, drivers licence); and
- farm, variety and crop information.

When you visit our website, our server makes a record of your visit and logs information for statistical purposes only. No attempt will be made by us to identify users of our website, or their browsing activities, unless we are lawfully required to do so for investigation or law enforcement purposes.

## 5 HOW DO WE COLLECT PERSONAL INFORMATION?

We will usually collect your personal information directly from you (i.e. via telephone or through our website), however we may collect your personal information from someone else if:

- it is unreasonable or impracticable for us to collect the information from you;
- you have consented to us obtaining the personal information from a third party; or
- we are authorised or required by law to collect the personal information from someone else.

## 6 WHAT HAPPENS IF YOU DO NOT PROVIDE PERSONAL INFORMATION?

You do not have to provide personal information to us. However, if you do not provide the personal information that we request, we may not be able to provide you with the relevant products or services.

In some cases, you will be able to remain anonymous or use a pseudonym. However, there may be occasions where it will be impractical for you to remain anonymous or use a pseudonym and we will advise you accordingly. For example, we may be unable to investigate and resolve a complaint you have made if you do not identify yourself.

## 7 HOW DO WE USE AND DISCLOSE YOUR PERSONAL INFORMATION?

We may use and disclose your personal information for the following purposes:

- to provide products and services that you have requested;
- to communicate with you;
- to provide you with information about other products or services that we believe may be of interest to you;
- to maintain relationships with our suppliers and contractors;

- to facilitate our internal business operations, including fulfilment of any legal requirements;
- to facilitate the exchange and sale of sugarcane varieties;
- to analyse our business or use of our website, enhance existing features, or develop new features, products and services; and
- to undertake our other activities and functions, including conducting sugar research, development and adoption.

We usually use and disclose your personal information for the primary purpose for which it was collected, which you are notified of at the time your information is collected. However, there are some circumstances in which we are permitted to use or disclose your personal information for another purpose (secondary purpose), such as where:

- you have consented to the secondary use or disclosure;
- you would reasonably expect us to use or disclose your personal information for a secondary purpose, and that purpose is related to the primary purpose of collecting the personal information;
- the secondary use or disclosure is required or authorised by or under an Australian law or a court/tribunal order; or
- as otherwise permitted by the Privacy Act.

We do not sell, rent or trade personal information about you to or with any third parties.

However, we may disclose your personal information to third parties for the purposes listed in this section 7, as need be, including to:

- our agents, contractors or third party service providers who provide services to us, or on our behalf;
- law enforcement agencies where the law requires or permits us to do so (e.g. for law enforcement purposes);
- third parties if you have provided your consent;
- if you are a grower, other growers, to facilitate the exchange and sale of sugarcane varieties;
- credit reporting or reference agencies or insurance investigators and underwriters; and
- a person authorised by you.

## **8 DISCLOSURE OF PERSONAL INFORMATION OVERSEAS**

From time to time we may disclose your personal information to an overseas recipient:

- for one or more of the purposes listed in section 7 above;
- to service providers or other third parties who operate or hold data outside Australia; or
- where required by law.

In each case, we will comply with the requirements of the Privacy Act that apply to the disclosure of personal information to an overseas recipient. We endeavour to use appropriate data handling and security arrangements for any information sent overseas.

For more information about which countries your information may be sent to, please contact the Privacy Officer at the address listed in section 12.

## **9 HOW IS YOUR PERSONAL INFORMATION STORED?**

We implement electronic and physical security measures to ensure that your personal information is stored in a secure environment and is protected from misuse, interference, loss, unauthorised access, modification or disclosure.

Our policy is to restrict access to your personal information to authorised persons who are our employees or contractors, on a need to know basis. We also take steps to destroy or delete your personal information when we no longer require it, as required by the APPs.

## 10 ACCESS TO PERSONAL INFORMATION

You can request access to, and corrections of, any personal information we hold about you at any time by submitting a written request to our Privacy Officer, using the contact details set out in section 12.

Upon written request, we will provide you with access to the personal information that we hold about you, unless providing access would be contrary to the Privacy Act.

We will endeavour to process your request within a reasonable time. There is no fee for requesting access to your personal information, but we may charge you a reasonable fee for processing your request or providing you with copies of your personal information, if complying with your request requires considerable time or expense on our part.

We seek to ensure that the personal information we hold is accurate, complete and up-to-date. We realise that this personal information may change frequently with changes of address and other personal circumstances. We encourage you to contact us as soon as possible if you need to update or correct any personal information we hold about you. Upon receiving your request, we will take reasonable steps to update and correct your personal information promptly.

If we refuse to provide you with access to, or are unable to correct, your personal information, we will provide you with a written notice that sets out our reasons for refusing your request.

## 11 MAKING A PRIVACY COMPLAINT

If you have a concern about your privacy, you have a right to make a complaint and we will do everything we can to address the issue.

To lodge a complaint, please contact our Privacy Officer at the address listed in section 12. In order to ensure we fully understand the nature of your complaint and the outcome you seek, please provide your complaint in writing.

We will acknowledge every complaint we receive and we will endeavour to resolve your complaint as soon as possible, noting that we endeavour to give you a final response within 45 days of receipt of the complaint. We will also keep you regularly up to date as to the progress of your complaint.

If you are not satisfied with our response, or the way we have handled your complaint, you may contact the OAIC at [www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/](http://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/).

## 12 CONTACT US

If you have any queries about the personal information that we hold about you, or the way we handle that personal information, please contact our Privacy Officer:

**Mail:** Sugar Research Australia Limited  
PO Box 86  
Indooroopilly QLD 4068

**Phone:** 07 3331 3333

**Email:** [sra@sugarrsearch.com.au](mailto:sra@sugarrsearch.com.au)

Further general information about privacy is available on the website of the OAIC at [www.oaic.gov.au](http://www.oaic.gov.au) or by calling the OAIC's enquiry line at 1300 363 992.

### **13 CHANGES TO THIS PRIVACY POLICY**

We may amend this Privacy Policy from time to time. A current version will be posted on our website and you may also obtain a copy by contacting our Privacy Officer on the details set out in section 12.

*[This Privacy Policy was reviewed in May 2020.]*