

# Privacy Policy

## Control

<b>Policy Name:</b>	Privacy Policy		
<b>Number:</b>	BP BRD 009	<b>Version:</b>	4
<b>Policy Approver:</b>	Board	<b>Approved Date:</b>	7 April 2015 (Reviewed May 2018)
<b>Policy Owner:</b>	Company Secretary & Legal Counsel	<b>Next Review:</b>	May 2020

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## 1. Context

- 1.1 SRA is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is defined in the *Privacy Act 1988 (Cth)* 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.”
- 1.2 SRA is committed to the adoption of the Australia Privacy Principles in carrying out its activities.

## 2. Purpose

- 2.1 The purpose of this document is to provide a framework for SRA in dealing with privacy considerations.

### 3. Application

- 3.1 This Policy applies to the conduct of all SRA operations by its Officers, Employees and authorised contractors.

### 4. Policy

- 4.1 SRA collects and administers a range of personal information for the purposes of:
- (a) providing products and services;
  - (b) communication and provision of information;
  - (c) maintaining relationships with suppliers and contractors;
  - (d) business as usual, including fulfilment of any legal requirements;
  - (e) facilitating the exchange or distribution of SRA sugarcane varieties; and
  - (f) evaluating our business with the view to enhancing and/or developing new features, products or services.
- 4.2 SRA recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by the way we do business.
- 4.3 SRA is bound by laws which impose specific obligations when it comes to handling information. The Australian Privacy Principles outline these obligations and SRA adopts the following as minimum standards in relation to handling personal information. SRA will:
- (a) maintain and publish a Privacy Policy Statement providing clear disclosure to third parties in relation to the collection, use, protection and access to personal information collected by SRA;
  - (b) collect only information which the organisation requires for its primary function;
  - (c) ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
  - (d) use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
  - (e) store personal information securely, protecting it from unauthorised access; and
  - (f) provide stakeholders with access to their own information, and the right to seek its correction.
- 4.4 The Chief Executive Officer of SRA will appoint a **Privacy Officer** who will be responsible for:
- (a) managing access to and correction of personal information by individuals;
  - (b) managing any complaints relating to privacy or access to personal information; and

- (c) ensuring regulatory compliance across the organisation to this policy, the Privacy Statement and influencing the content of related policies.

4.5 In order to meet the statutory obligations SRA has under the new mandatory data breach notification scheme (**DBN Scheme**) in Part IIIC of the Privacy Act that came into effect from 22 February 2018, SRA has developed a Data Breach Response Plan to enable SRA to:

- (a) Identify, contain, escalate, assess and respond to data breaches in a timely manner;
- (b) Proactively help mitigate and remediate potential harm to affected individuals;
- (c) Document its processes and data breach responses;
- (d) Identify SRA staff roles and responsibilities and reporting lines in the event of a data breach and who SRA staff can contact;
- (e) Identify the relevant SRA staff responsible for managing any data breach response; and
- (f) Ensure SRA's ongoing compliance with its data security obligations in Australian Privacy Principle 11.1.

4.6 SRA maintains as part of its insurance portfolio a Cyber, Privacy and Media Risks insurance policy which insures SRA against, inter alia, cyber and privacy liability, system damage and/or interruption, consequential reputational harm, regulatory actions/investigations, Privacy breach notification costs, cyber crime liability, technology errors and omissions and Court attendance fees.

## 5. Roles and Responsibilities

	Role	Responsibility
5.1	Board	<ul style="list-style-type: none"> <li>• Approving SRA's Privacy Policy; and</li> <li>• Reviewing and considering reports from the Company Secretary and/or Privacy Officer regarding this Policy and SRA's compliance with the Privacy Act, Australian Privacy Principles and any related regulations.</li> </ul>
5.2	Chief Executive Officer	<ul style="list-style-type: none"> <li>• Overall responsibility and accountability for implementing this Policy.</li> </ul>
5.3	Company Secretary	<ul style="list-style-type: none"> <li>• Ensuring annual review of this Policy; and</li> <li>• Reporting to the Board and/or relevant Board Committee in relation to this Policy and the Privacy Act, Australia Privacy Principles and any related regulations.</li> </ul>
5.4	Executive Managers and Managers	<ul style="list-style-type: none"> <li>• Providing direction and guidance within their areas of accountability to ensure this Policy is adhered to by Employees reporting to them;</li> </ul>

		<ul style="list-style-type: none"> <li>Reporting to the Privacy Officer any complaints relating to privacy related matters or access to personal information; and</li> <li>Liaising with the Privacy Officer as necessary in relation to matters arising under this Policy.</li> </ul>
5.5	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>
5.6	Privacy Officer	<ul style="list-style-type: none"> <li>As per clause 4.4 of this Policy; and</li> <li>Reporting to the Chief Executive Officer and/or the Company Secretary in relation to this Policy.</li> </ul>

## 6. Definitions

	Term	Definition
6.1	Australia Privacy Principles or APPs	The Australian Privacy Principles as contained in the Privacy Act.
6.2	Personal Information	Any 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.
6.3	Privacy Act	<i>Privacy Act 1988</i> (Cth) (as amended from time to time).
6.4	Privacy Officer	The privacy officer appointed by the SRA Chief Executive Officer from time to time.
6.5	Privacy Policy Statement	SRA's privacy policy statement made available to the public on its website at <a href="http://www.sugarresearch.com.au">www.sugarresearch.com.au</a> .
6.6	SRA	Sugar Research Australia Limited ABN 16 163 670 068.

## 7. References

7.1	Australian Privacy Principles
7.2	Privacy Act
7.3	Office of the Australian Information Commissioner
7.4	SRA Privacy Policy Statement at <a href="http://www.sugarresearch.com.au">www.sugarresearch.com.au</a> .

## 8. Review

8.1 This Policy and the Privacy Policy Statement must be reviewed every two years.