

Privacy Policy

This Privacy Policy sets out how South Pacific Seeds ("we", "our" and "us") collects, stores, uses and discloses personal information. It also explains how individuals can seek to access and correct their personal information and make a privacy complaint.

Specific information about how we handle your [credit-related personal information](#) is contained in the section titled '[Credit-related personal information](#)'.

This Privacy Policy may be updated from time-to-time. Changes will be updated on this website <http://www.spssales.com.au/site/privacy/>. This version of our Privacy Policy was last updated on 14 April 2014.

What kinds of personal information do we collect and hold?

The personal information collected and maintained by us will depend on our interaction with you and generally includes your name, contact details and, where you purchase our seeds, credit card or debit card information.

We may also collect and maintain your [credit-related personal information](#). For more information, see the section titled '[Credit-related personal information](#)'.

For employment applications, we may collect your name, address, contact details, current and past employment information, and educational qualifications. For contractors and suppliers, we may collect your name, contact details, ABN, and bank account details for payment purposes.

How do we collect your personal information?

Where it is possible, we collect your personal information directly from you in person, in writing, over the telephone, by facsimile or by email. In some circumstances, we may also collect it from third parties such as from referees listed on your CV.

We may also collect your personal information from third parties for the purpose of assessing your credit application. For more information, see the section titled '[Credit-related personal information](#)'.

Cookies

We may collect information about your visit to our site through cookies. Cookies are data that a website transfers to an individual's hard drive for record-keeping purposes. Cookies, which are industry standard and are used by most websites, including those operated by us, can facilitate a user's ongoing access to and use of a site. They allow us to customise the website to your needs. Examples of information that we collect through cookies include: day and time of your visit, whether you have visited our website previously, whether you used a search engine to find us and some geographical information about what country and state you are in.

If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. But you should note that cookies may be necessary to provide you with some features of our on-line services.

For what purposes do we collect, hold and use your personal information?

The main purpose for which we collect personal information is to enable us to produce, market and sell our seeds.

We may use and disclose your personal information for this and other purposes, including conducting our business; communicating with you; assessing your credit application (for more information see the section titled '[Credit-related personal information](#)'); employing staff; informing you about our seed products which we think may be of interest to you; improving our seeds; and meeting our legal obligations.

If you wish to stop receiving information about our seed products, please contact us on the details at the end of this Privacy Policy or by using the unsubscribe facility contained in the particular communication in which we send the information.

Who do we disclose your personal information to and why?

We may disclose your personal information to others for the purposes specified in the section above. This may include disclosure to our related companies located in Australia; our seed business partners; where required or authorised by law to do so; and to anyone else to whom you authorise us to disclose it.

We may also disclose your personal information to third parties for the purpose of assessing your credit application. See the section below for more information.

We do not currently disclose your personal information to recipients located outside of Australia.

Credit-related personal information

We are a credit provider within the meaning of the *Privacy Act 1988* (Cth), and the Credit Reporting Privacy Code registered under that Act. We provide *commercial credit only* to approved companies, partnerships and sole traders who apply for a commercial credit account with us. In order to assess applications for commercial credit and to administer those accounts, we may collect, hold, use and disclose credit-related personal information about you.

What kinds of credit-related personal information do we collect and hold?

The kinds of credit-related personal information that we collect and hold are:

- identification information, such as your name and address(es);
- the type and amount of commercial credit sought from us;
- the fact that you receive, or have received, consumer credit from other credit providers, the of type and amount of credit received, and the date on which it was paid or otherwise terminated;
- the fact that we have sought information about you from a credit reporting body:
 - in connection with an application for commercial credit; or
 - for a credit guarantee purpose;
- whether you have met, or failed to meet, your repayment obligations in connection with consumer credit provided by other credit providers;

- details of you defaulting on a repayment of consumer credit provided by other credit providers (ie. a repayment that is at least 60 days overdue and over \$150 in value) and information regarding you having paid any amount previously reported as being in default;
- information regarding whether you have entered into a new arrangement with another credit provider in relation to consumer credit provided to you by the other credit provider;
- the opinion of a consumer credit provider that you have committed a serious credit infringement;
- personal insolvency information;
- court records that relate to credit provided to, or applied for by, you;
- publicly available information about your credit worthiness; and
- information that we obtain from credit reporting bodies about you such as reports, records, credit scores or assessments and any information that we then derive from that information which has a bearing on your creditworthiness (such as internally generated credit scores, assessments, summaries or evaluations).

How do we collect credit-related personal information?

We collect credit-related personal information about you through our credit application form and from other sources, such as:

- the credit reporting body, Dun & Bradstreet;
- other credit providers (including our related bodies corporate and seed business partners who are credit providers);
- publically available sources; and
- from our own records, from which we derive information we consider relevant, such as internally generated credit scores, assessments, summaries or evaluations.

For what purposes do we collect, hold and use credit-related personal information?

We collect, hold, use and/or disclose credit-related personal information for the purpose of assessing applications for commercial credit and managing commercial credit accounts. This includes:

- obtaining references from other credit providers;
- assessing whether to accept an individual as a guarantor in relation to commercial credit;
- assisting those who we provide credit to avoid defaulting on repayment obligations;
- managing the collection of overdue payments; and
- complying with our obligations under Australian law, including under the Privacy Act and the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

We also collect, hold, use and/or disclose this information to:

- notify our related bodies corporate and seed business partners who are credit providers of a default in relation to commercial credit provided by us;
- provide a reference to other credit providers in relation to their assessment of an application for credit with them; and
- undertake such other activities as required or authorised by an Australian law or court/tribunal order.

Who do we disclose credit-related personal information to?

For the purposes above, subject to our obligations under the *Privacy Act*, we may disclose credit-related personal information to other credit providers (including to our related bodies corporate and seed business partners who are credit providers), debt collection or recovery service providers, and guarantors or prospective guarantors.

We may also disclose your identification information to the credit reporting body, Dun & Bradstreet.

We do not disclose credit-related personal information to recipients located overseas.

The following sections of this Privacy Policy apply to all personal information, including credit-related personal information.

How we hold personal information (including credit-related personal information) and keep it secure

We hold your personal information in a combination of hard copy and electronic files.

We strive to ensure the security, integrity and privacy of personal information submitted to our sites, and we review and update our security measures in light of current technologies. We will endeavour to take all reasonable steps to protect personal information from risks such as misuse, interference and loss, and from unauthorised access, modification or disclosure.

We have systems and procedures in place to safeguard information, including the use of technical measures such as encrypted servers and maintaining physical security in order to prevent unauthorised access to records, documents and materials.

In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us.

We will take steps to destroy or de-identify your personal information where we no longer require it.

Access to, and correction of, personal information (including credit-related personal information)

If you would like to request access to, or correction of, the personal information we hold about you, please contact us on the details set out at the end of this Privacy Policy.

We will provide you with access to the information we hold about you, including for the purpose of correcting or updating that information, unless there is an exception which applies under the *Privacy Act*.

We may recover from you our reasonable costs of supplying you with access to this information. However, we will not charge you for the making of the request or to correct or update your personal information.

Your request for access and/or correction will be dealt with as soon as reasonably practicable. Where the request relates credit-related personal information, we will generally provide access or

correct the information (where we are satisfied that the information is incorrect) within 30 days, unless:

- in respect of access requests, unusual circumstances apply; or
- in respect of correction requests, we agree another period with you in writing.

If we refuse to provide you with access to, or correct, the information, we will generally notify you of our reasons for refusal to the extent required and how you may complain about the refusal.

Links to other sites

We provide links to websites outside of our websites, as well as to third party Web sites. These linked sites are not under our control, and we cannot accept responsibility for the conduct of companies linked to our website. Before disclosing your personal information on any other website, we advise you to examine the terms and conditions of using that websites and its privacy statement.

Privacy complaints and further information

If you have any further queries relating to our Privacy Policy, or you have a problem or complaint (including about our compliance with the *Privacy Act* or the Credit Reporting Privacy Code), please contact us on the following details:

The Company Secretary
South Pacific Seeds Pty Ltd
PO Box 934, Griffith NSW 2680
Tel: 02 69627333

We will respond to your query or complaint as soon as reasonably practicable.

If your complaint relates to [credit-related personal information](#), we will, within 7 days, acknowledge your complaint in writing and explain how we will deal with and investigate it. Depending on the nature of your complaint and the information to which it relates, we may need to consult with and/or notify particular credit reporting bodies or other credit providers. We will make a decision about your complaint following our investigation, and will advise of this in writing within 30 days of your complaint or such longer period as we agree with you in writing.

If you are not satisfied with our response, you may also contact the Office of the Australian Information Commissioner.

For more information about privacy issues in Australia and protecting your privacy, visit the Office of the Australian Information Commissioner's web site. <http://www.oaic.gov.au/>