Introduction

This Policy describes the handling of Personal Information collected by GrainCorp Limited and its related entities and bodies corporate ("**GrainCorp**" or "**GrainCorp Group**") within the Commonwealth of Australia.

GrainCorp recognises the importance of and is committed to the protection of personal privacy. GrainCorp is bound by the Australian Privacy Principles (APPs) as provided for in the federal Privacy Act 1988, which came into effect on 12 March 2014 to govern information collected from that date and prior collected information which is used from that date. This Policy has been developed as part of GrainCorp's ongoing commitment to the protection of the privacy of individuals with whom it deals.

The information in this Policy relates to GrainCorp's current privacy standards. GrainCorp may vary these standards from time to time. Any variation will be reflected in the Policy. GrainCorp encourages individuals to check this Policy from time to time to ensure they are aware of the most up to date privacy standards applying to the handling of their personal information.

Objectives

The objectives of this Policy are to:

- Establish a set of privacy standards to which GrainCorp will comply to protect the privacy of individuals whose personal information GrainCorp collects, uses, discloses, stores or handles;
- Demonstrate GrainCorp's ongoing commitment to protecting privacy and to address any privacy concerns individuals may have arising from its functions and activities;
- Describe the manner and purposes for which GrainCorp collects, uses, discloses, stores and handles personal information;
- Describe how an individual may access their personal information and seek correction of that information;
- Describe how an individual may complain about a breach of the APPs by GrainCorp;
- Ensure that GrainCorp complies with its obligations under the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012.

GrainCorp's functions and activities

The business of GrainCorp is described in detail in other documents such as the GrainCorp Annual Report. In summary, GrainCorp is involved in the provision of bulk grain storage and handling services and supply of grains / oilseeds, malt, edible oils and fats and other products to customer groups across the spectrum – from growers, to end consumers, in Australia and abroad. GrainCorp operates a grain marketing division which offers a range of marketing and contracting alternatives for grains, cereals, oilseeds and pulses. In conducting its business, GrainCorp carries out a range of activities including managing grain storage, manufacturing food products, building and maintaining its commercial and business relationships with customers, performing administrative functions, promoting its products and services and complying with legal requirements. GrainCorp may also facilitate the buying and/or selling of grain over its website, web based applications or an internet portal.

Collecting your Personal Information

GrainCorp collects information from individuals in order to conduct various aspects of business functions and activities.

These individuals include but are not limited to GrainCorp's customers, prospective customers, contractors, suppliers, agents, service providers and employees, depending on the service to be accessed.

The information we collect may include (but is not limited to): your name, address, telephone number/s, email address, date of birth, financial status, National Grower Register (NGR) details, credit history, transaction history, banking details, insurances, employment history, educational qualifications or personal references.

We may also collect the following sensitive information in certain circumstances, including but not limited to: your tax file number, criminal convictions, racial or ethnic origin. Refer to the section "Collection of Information for Employment Purposes" below.

GrainCorp collects personal information from documents such as application or registration forms, supplementary forms, competition forms, letters, e-mails or as derived in meetings, seminars, telephone conversations or written exchanges. GrainCorp may also collect personal information through an individual's use of the GrainCorp Group website/s, applications or web based tools. We may also collect your personal information if the law requires us to collect it.

With regard to personal information produced or transmitted by electronic communications (i.e. the internet, electronic devices or web based tools), GrainCorp may collect the following information: website access, use and/or viewing, GPS locations or handset details if GrainCorp's website or related applications are accessed on a mobile device.

GrainCorp may use Cookies when you access the GrainCorp website. Cookies are small files that a website writes to a user's hard drive when that user visits the website. Cookies cannot read information from the user's hard drive or read information from other cookies.

The type of information logged may include the following information captured from a user's browser:

- The type of browser and operating system used;
- The previous website the user visited;
- The user's server's IP address;
- Date and time of the user's visit;
- The address of the pages accessed;
- The documents downloaded and the size of the download; and
- User name and websites visited (GrainCorp employees only)

Via the use of a 'cookie', we can record the pages visited and the information accessed and viewed / used. This information is used anonymously and in aggregate, and is collected and logged for statistical purposes. Through analysis of these records, we strive to provide an improved service when users revisit our websites or use our applications or web tools.

You may set your browser(s) to provide notification when a cookie is received, and the opportunity to accept or reject the cookie. You can also refuse all cookies by turning the function off in your browsers. However, to ensure the full functionality of our website and applications/ web based tools the use of cookies is needed.

Wherever possible GrainCorp collects personal information from the person concerned, but we may obtain information about a person from others. Collection of information via third persons may take the form of details held by:

- credit reporting bodies;
- organisations that GrainCorp has an arrangement with to jointly provide or offer products;
- organisations where GrainCorp may have a relationship to share information for marketing purposes;
- related entities within the GrainCorp Group; or
- third party referrals.

The personal information collected may be used or disclosed for the GrainCorp Group's business purposes including (but not limited to):

- to administer and manage the commercial relationship between the individual and GrainCorp;
- to send e-mails or direct marketing material to the individual, providing general information about products or services offered by GrainCorp or available from other persons nominated by GrainCorp, but only with the express consent of the user to do so; and
- to efficiently and effectively manage GrainCorp's business operations.

Collection of unsolicited Personal Information (APP4)

From time to time GrainCorp may receive personal information from others which was not solicited.

If GrainCorp receives unsolicited personal information, the company is required to determine whether it could have collected the information in accordance with Australian Privacy Principle 3. If GrainCorp cannot meet this requirement, the company will destroy or de-identify the information, if it is lawful and reasonable to do so. However, if GrainCorp can satisfy the test, the company will retain the personal information and handle it in accordance with this Privacy Policy and the Australian Privacy Principles.

Collection of information for employment purposes

When you subscribe to our online job vacancy website, we will collect more specific personal information about you, such as your name, email address and telephone number, qualifications or career history. We may also ask you for other information, such as information on your interests and the types of jobs you are interested in. The personal information you provide to GrainCorp via this job vacancy website will only be processed for the purpose of considering employment or graduate positions with GrainCorp, and if you work for us, in any way connected to your employment.

Sensitive information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, sex life, litigation or convictions will only be collected and processed by GrainCorp if such processing is necessary to comply with equal opportunity laws and regulations. We recommend you only communicate such sensitive information if you believe it is required for GrainCorp to comply with such laws and regulations.

From time to time we may ask for sensitive information concerning your health. Health information is used by us to assess your suitability for conducting certain forms of work (i.e. manual handling, working at heights etc), to ensure your continued safety and the safety of others at our workplaces.

How do we manage your Personal Information?

The personal information we collect from you may be stored electronically or in hard copy. Privacy protection is an essential component of GrainCorp's operational requirements and business integrity, and we will take all reasonable steps to ensure that:

- Personal information held in paper or electronic form is safe and secure and that it is protected from misuse, interference, loss, unauthorised access, modification or disclosure; and
- Personal information is only used by employees or disclosed to other organisations to the extent necessary for GrainCorp's business purposes

GrainCorp has security systems in place to ensure your electronically stored personal information is kept secure (i.e. firewalls, virus and intrusion detection, etc). Hard copy information is retained at GrainCorp offices and facilities, and in some cases third party facilities, and we take all reasonable steps to ensure that the information is kept secure in its physical form.

GrainCorp may contain personal information about you that the business no longer needs. We will take reasonable steps to destroy or de-identify this personal information, in accordance with our document retention procedures, and any obligations under Australian Law.

If you access secured sections of our website, we employ encryption technology for storage and transmission of personal information using this medium.

Accuracy and quality of Personal Information (APP 10)

GrainCorp will take reasonable steps to ensure that the personal information we collect, use or disclose is correct, complete and up to date. From time to time we may contact / remind you to update your personal information, or implement other processes by which you can update your personal information yourself. Any inaccurate personal information held will be corrected promptly when it is identified.

Anonymity and Pseudonymity (APP 2)

Individuals may choose to remain anonymous or use a pseudonym when dealing with GrainCorp; however GrainCorp reserves the right to refuse all products and services if such anonymity or pseudonymity is impracticable to our operations.

There may be situations where it will not be impracticable for you to be anonymous or use a pseudonym. Such situations include:

- Telephone or email communications with GrainCorp that request general information about products and services we offer;
- Lodging complaints in writing or verbally; or
- Some circumstances where you can purchase goods for cash.

Direct marketing (APP 7)

GrainCorp offers a broad range of products and services, and from time to time we engage in direct marketing to communicate these offerings to you. Should you wish to "opt-out" of the direct marketing communication, you can do so by following the instructions in that communication, or alternatively contact the Privacy Officer (contact information at the conclusion of this policy) with details of the communication and your wish to "opt-out".

Consent to use or disclose your Personal Information

There may be circumstances in which we require your consent to use or disclose your personal information. We require your consent if we intend to use your information for a purpose unrelated to the purpose for which we collected it.

Your consent may be express (i.e. you agree to the specific use by signing a form or ticking a box), or it may be implied (i.e. your consent is granted if you have agreed to general terms and conditions which may contain information concerning use or disclosure).

Disclosure of personal information within Australia and overseas (APP 8)

Where necessary for its business purposes, GrainCorp may disclose personal information to other organisations such as its service providers, bulk handling and marketing companies, regulators, banks or other companies within the GrainCorp Group. GrainCorp will require these organisations to adhere to strict privacy protection requirements and also seek privacy protection obligations in relation to information disclosed by GrainCorp in these circumstances.

GrainCorp may also need to disclose information by law, for statutory reporting purposes or in order to prevent breaches of the law. Details of these disclosures will be included in the privacy statements given by GrainCorp, made in connection with grower deliveries and also in connection with associated financial and trading products.

From time to time we may disclose your personal information to the authorities; our advisors; suppliers of IT, recruitment, investigation or other third parties engaged by GrainCorp to provide services; to protect any intellectual property rights in any materials displayed on or otherwise available from our website; and to enforce our website Terms of Use.

GrainCorp is an international business that operates globally, and we may share all of the personal information you submit to us with any related body corporate of the GrainCorp Group. A list of related bodies corporate to GrainCorp Limited is attached to this Policy. GrainCorp has direct operations in the following countries: Australia, New Zealand, Singapore, China, the United Kingdom, Germany, the United States and Canada. GrainCorp entities in these countries are required to maintain the confidentiality of this information and are restricted from using it for any purpose other than the purposes set out in this Privacy Policy.

However, the cross-border privacy protection principles will not apply to the personal information we hold about you if a permitted general situation exists, which may include: lessening or preventing a serious threat to life health or safety; taking appropriate action in relation to suspected unlawful activity or serious misconduct; locating a missing person; necessary for diplomatic or consular function or activity; or, necessary for certain Defence force activities outside of Australia.

Destruction and de-identification of personal information

GrainCorp will take all reasonable steps to de-identify or destroy personal information when it is no longer required for one of GrainCorp's business functions or activities or for legal requirements.

Access to and correction of Personal Information and the complaint process (APP 12 & 13)

Individuals have the right to request access to or correction of their personal information held by GrainCorp, or to make a complaint in relation to GrainCorp's handling of their personal information. For access requests, no lodgement fees will be charged, however, a fee may be charged by GrainCorp for the reasonable expenses incurred (such as searches or photocopying costs) in providing the information requested. There are some situations where GrainCorp is not required to give you access to or correct the personal information. These situations are outlined

in APP 12.3 *Exception to Access* and APP13.3 *Refusal to Correct Information*. GrainCorp will explain in writing the reasons for refusing access or refusing correction and the mechanism available to complain about the refusal.

There may be circumstances in which GrainCorp is required to provide access to your personal information to third parties. Such circumstances could include an obligation to disclose your information under an Australian law or an order of a Court or Tribunal.

The Privacy Officer oversees privacy at GrainCorp, and is located at GrainCorp's head office in Sydney. Privacy related requests and complaints should be made in writing and referred directly to the Privacy Officer. Contact details for the Privacy Officer are outlined under *"Further Information"*. All reasonable endeavours will be made to resolve complaints within 30 days of the lodgement. If you believe that GrainCorp has not appropriately dealt with your request, you may refer this to the Office of the Australian Information Commissioner and the contact details are: phone, 1300 363 992 or email, enquiries@oaic.gov.au.

Credit reporting

GrainCorp provides certain goods and services to customers on commercial credit terms. GrainCorp may need to handle personal information about customer credit worthiness in connection with those arrangements. This section applies in relation to that sort of personal information ("credit-related personal information"). Other sections of this Privacy Policy are particularly pertinent to this section dealing with access, correction, complaints, cross-border disclosures of personal information and how GrainCorp collects and holds personal information. There may be cases where GrainCorp is subject to further obligations under the Privacy Act and to the extent applicable, the Privacy (Credit Reporting) Code (collectively, the "Privacy Law"), and this Policy is not intended to limit or exclude those obligations.

If you apply for customer credit with GrainCorp Limited or its related bodies corporate, or you will be guaranteeing the obligations of a credit applicant, we may request a credit report about you from a credit reporting body **("CRB")**. Credit reports contain credit related personal information about you, and we use these reports to assess your application and ability to repay credit. To obtain these reports, GrainCorp will disclose credit related personal information so that the CRB can accurately identify you.

We may, to the extent permitted under the Privacy Law collect, hold and disclose any types of credit-related personal information about a person, including:

(i) name, sex, date of birth, driver's licence number, employer name and three most recent addresses;

(ii) the fact that the person has applied for credit and the amount and type of credit limit;

(iii) confirmation of previous information requests to CRBs made by other credit providers, mortgage insurers and trade insurers;

(iv) details of the person's credit providers;

(v) start and end dates of credit arrangements and certain terms and conditions of those arrangements;

(vi) permitted payment default information, including information about related payment arrangements and subsequent repayment;

(vii) information about serious credit infringements (e.g. fraud);

(viii) information about adverse court judgments;

(ix) publicly available information about the person's credit worthiness;

(x) certain insolvency information from the National Personal Insolvency Index;

(xi) any credit score or credit risk assessment indicating a credit reporting body's or credit provider's analysis of your eligibility for credit.

Where we have collected credit-related information about you from a CRB, we may use that information to produce our own assessments and ratings in respect of your credit worthiness.

GrainCorp may exchange credit-related personal information with CRBs as may be permitted under the Privacy Law to:

(i) assist CRBs to maintain information about you to provide to other credit providers in order for credit assessments to be undertaken;

(ii) assess a credit application made by you or an application to be a guarantor;

(iii) manage credit;

(iv) create assessments and ratings of your credit worthiness.

The CRBs to which we may disclose credit-related personal information are:

Dun and Bradstreet (Australia) Pty Ltd

Level 24, 201 Elizabeth Street, Sydney NSW 2000
Phone: 1300 734 806
Web: www.dnb.com.au

QBE Insurance (Australia) Limited
Level 7, 2 Park Street, Sydney, NSW 2000
Phone: 133 723
Web: www.qbe.com.au

National Credit Insurance (Brokers) Pty Limited
Level 2, 165 Grenfell Street, Adelaide, SA 5000
Phone: 1800 882 820
Web: www.nci.com.au

Veda Advantage Information Services & Solutions Limited

Level 15, 100 Arthur St, North Sydney, NSW 2000
Phone: 1300 850 211
Web: www.mycreditfile.com.au

Under the Privacy Law, you have the right to request CRBs not to:

- use your credit-related personal information to determine your eligibility to receive direct marketing from credit providers; and
- use or disclose your credit-related personal information, if you have been or are likely to be a victim of fraud.

Third party websites

Other websites may be accessible via hyperlinks from the GrainCorp website however these third parties are not a party to or subject to GrainCorp's Privacy Policy. We recommend you review the privacy policy of such third parties if you wish to access their website from our links, and satisfy yourself of their procedures and policies regarding your personal information.

Compliance with this Policy

GrainCorp will implement this Policy through the use of proper procedures, staff training and audit provisions. Employees and contractors who handle personal information on behalf of GrainCorp are aware of the standards of this Policy and are required to uphold and protect individuals' privacy accordingly.

Changes to this policy will be made available on our website www.graincorp.com.au

Further information

For further information concerning this Privacy Policy please contact:

Privacy Officer
GrainCorp Limited
Level 28, 175 Liverpool St
SYDNEY NSW 2000
AUSTRALIA
P: +61 29325 9100
F: +61 29325 9180
E: privacy.officer@graincorp.com.au

Approval and Revision

This Policy & Procedure was approved by the Safety Health Environment and Governance Committee on 10 June 2015.

Overseas Disclosure to Related Bodies Corporate (APP 8) – List of GrainCorp Related Corporates

Related Body Corporate	Domicile / Country
GrainCorp Limited	Australia
GrainCorp Services Limited	Australia
GrainCorp Operations Limited	Australia
Vicgrain Pty Limited	Australia
Vicgrain (Assets) Pty Limited	Australia
Grainco Australia Pty Limited	Australia
GrainCorp Warehouse Cashflow Pty Ltd	Australia
Hunter Grain Pty Limited	Australia
Hunter Grain Transport Pty Limited	Australia
GrainCorp Australia Pty Ltd	Australia
GrainCorp Holdings Australia Pty Ltd	Australia
Australia Malt Holdco Pty Ltd	Australia
Australia Malt Finco Pty Ltd	Australia
Malt Real Property Pty Limited	Australia
Barrett Burston Malting Co. Pty. Ltd.	Australia
Barrett Burston Malting Company WA Pty Limited	Australia
GrainCorp Oils Holdings Pty Ltd	Australia
GrainCorp Foods Australia Pty Ltd	Australia
GrainCorp Commodity Management (Holdings) Pty Ltd	Australia
GrainCorp Commodity Management Pty Limited	Australia
GrainCorp Liquid Terminals Australia Pty Ltd	Australia
GrainCorp Oilseeds Pty Ltd	Australia
Auscol Pty Ltd	Australia
GSEST Pty Ltd	Australia
Champion Liquid Feeds Pty Limited	Australia
Flex Biofuels Pty Limited	Australia
Security Superannuation Fund Pty Limited	Australia
Agricultural Risk Management Services Pty Limited	Australia
GrainCorp AG Finance Limited	Australia
Containerlink Pty Limited	Australia
ABN 36 073 105 656 Pty Ltd (form. Globex International Pty Limited)	Australia
Allied Mills Australia Pty Limited	Australia
National Grower Register Pty Ltd	Australia
GrainCorp Foods NZ Limited	New Zealand
GrainCorp Commodity Management (NZ) Limited	New Zealand
GrainCorp Feeds Limited	New Zealand
Enzpro NZ Limited	New Zealand
GrainCorp Liquid Terminals NZ Limited	New Zealand
GrainCorp Operations Asia Pte Ltd	Singapore
Gardner Smith Commodities Trading (Shanghai) Co., Ltd (TBA)	China
Shanghai Grand Port Liquid Storage Terminals Co., Ltd (TBA)	China
GrainCorp (Canada) Holdings UK Limited	United Kingdom

Related Body Corporate	Domicile / Country
GrainCorp UK Limited	United Kingdom
GrainCorp Europe (UK) Ltd	United Kingdom
Malt UK Holdco Limited	United Kingdom
Ulgrave Limited	United Kingdom
Maltco 3 Limited	United Kingdom
Bairds Malt Limited	United Kingdom
Norton Organic Grain Limited	United Kingdom
Brewers Select Limited	United Kingdom
Scotgrain Agriculture Limited *(Dormant)*	United Kingdom
Mark Lawrence (Grain) Limited *(Dormant)*	United Kingdom
Saxon Agriculture Limited *(Dormant)*	United Kingdom
Moray Firth Maltings Limited *(Dormant)*	United Kingdom
Bairds Malt (Pension Trustees) Limited *(Dormant)*	United Kingdom
Canada Malting Co. Limited *(form. GrainCorp Canada Ltd)*	Canada
Coastal Containers Limited	Canada
GrainCorp Canada Inc.	Canada
GrainCorp Holdings USA	United States
GrainCorp USA	United States
Malt US Holdco, Inc	United States
Great Western Malting Co	United States
GrainCorp Europe Management GmbH	Germany
GrainCorp Europe GmbH & Co. KG	Germany
Schill Malz GmbH & Co. KG	Germany
Schill Malz Verwaltungs-GmbH	Germany
Rhein-Ruhr-Malz GmbH	Germany
Thüringer Malz GmbH	Germany