

PRIVACY POLICY

IDENTITY OF COLLECTING ORGANISATION

We are National Grower Register Pty Ltd (NGR, We, Our or Us).

You, your, is a reference to a Grower, Trader, User, Data Subscriber and their Authorised User as the case may be.

Words and phrases (including defined words) used in this Policy have the same meaning as that word or phrase is used and defined in our Terms, including Data Subscriber Terms and Grower & User Terms.

We provide Data Subscribers (typically agricultural commodity buyers) with a centralised national register of Grower Data, and offer the NGR Card to facilitate transfer of information between Buyers and Growers. NGR will not make information available to a Data Subscriber unless that Data Subscriber has received the Grower's NGR Card Number from the Grower and has also committed to NGR in writing that it will abide by our Terms and observe this Privacy Policy.

By submitting a Data Subscriber Application Form, a Data Subscriber is agreeing to be bound by our Terms, which impose obligations on the Data Subscriber and their Authorised Users as to the use of a Grower's Data.

For an up-to-date list of Data Subscribers please refer to our website www.ngr.com.au or contact the Privacy Officer (see below).

We do not handle or collect information relating to specific transactions involving the sale of Grain or other Agricultural Product. NGR does not become involved in the transaction but simply operates a database of NGR Card Information, associated Grower Data and Information of Users who have authority to act on behalf of the Grower.

OUR OBLIGATIONS UNDER THE PRIVACY ACT 1988

This Privacy Policy sets out how we comply with our obligations under the Privacy Act 1988 (Cth) and Australian Privacy Principles. NGR may collect, use, disclose, manage and store your Personal Information by you:

- completing your Registration as a User for any Grower for whom you have authority to act;
- using the NGR websites; and
- providing Personal Information to NGR, its officers, agents or employees in any way.

After this Policy has been brought to your attention, you acknowledge and consent to the use, storage or disclosure of your Personal Information by NGR in accordance with this Policy and the Privacy Act and our Terms.

If you do not agree to NGR handling your Personal Information in the manner set out in this Policy you must immediately cease to access Our Service Centre, our websites, and you should not provide NGR with any of your Personal Information.

1. WHAT IS PERSONAL INFORMATION?

We follow the definition of Personal Information given in the Privacy Act *as being*:

... 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.

Generally words and phrases in this Policy are used in accordance with or as they are defined in the Privacy Act and our Terms.

2. WHAT KINDS OF PERSONAL INFORMATION MIGHT WE COLLECT AND HOLD?

We may collect (and hold) different Personal Information from you depending upon how you interact with NGR.

NGR classifies Personal Information as Contact and Identification Information, Payment and Taxation Information, Voluntary Membership, Donation and Levy Information, and Subscription Data.

If you contact NGR, we will collect:

- your name;
- your residential and postal address;
- your email address;
- your phone number(s);
- your date of birth and other Security Questions and Answers to allow access to secured data on the NGR System including myNGR;
- your Login Name and Password;
- your signature specimen; and
- your Know Your Customer Information and Primary and Secondary Identification Documents to allow us to properly identify you during future contact.

For any Growers for whom you have authority to act, we may collect:

- the percentage split of payments to go to each of the Payee(s) and the associated Card(s);
- the preferred method of payment;

- Grower Data and Subscription Data (if applicable);
- the bank BSB and account number;
- the Australian Business Number (ABN), and other ABN associated details such as Entity Name, GST Status and GST Start and End Date, of the business entity (if provided);
- for a company, the name, address and contact details for each director, secretary and shareholder of the company;
- for a trust, the name, address and contact details for the trustee (and if the trustee is a company trustee, the name, address and contact details for the directors, secretaries and shareholders of the company trustee);
- Statement by a Supplier (if required);
- Recipient Created Tax Invoice consent (if applicable);
- Voluntary Membership Donations and Levy Deductions and/or End Point Royalties;
- location of main grain producing property contributing grain to be sold using the NGR Card;
- the SA Hundreds where the location is South Australia; and
- Third Party Identifiers (if provided).

For any Data Subscribers and their Authorised Users, we may collect:

- name, address and contact details of the individual or business entity that is a Data Subscriber as per the Data Subscriber Application Form;
- ABN of the business entity (if provided); and
- name, address and contact details of the Authorised Users of a Data Subscriber, (including Know Your Customer Information and Primary and Secondary Identification Documents) to allow us to properly identify you during future contact.

If you access our websites and or the myNGR application, we may collect the following information about how you have used our site, including but not limited to:

- the Confirmation Code, Login Name and Password when you register with myNGR;
- browser information;
- Internet Protocol 'IP' address;
- documents downloaded, access date and time and length of session;
- installed software; and
- hardware type.

3. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect Personal Information:

- directly from you when you contact NGR;
- when we contact you;
- when you complete your Registration as a User and create a Grower Account;
- when you complete a Data Subscriber Application Form.

When you telephone us or we telephone you, we may monitor and or record calls for the purpose of:

- confirming your consent to collect, store, use and disclose Personal Information;
- staff training;
- verifying statements made during the phone call;
- assisting us in the operation of the NGR System; and
- addressing any of your concerns.

If we receive unsolicited information, we will make a determination within a reasonable period of time as to whether the information could have been collected through normal means, including direct from you. In order to make that determination however, we may use or disclose your Personal Information to others including using your Personal Information to contact you.

If we determine that the information could not have been collected through normal means, including having being solicited direct from you, we will securely destroy the information or de-identify it as soon as is practicable, and if it is lawful and reasonable to do so.

This includes destroying or de-identifying information that is not strictly necessary for our business activities.

4. HOW DO WE HOLD AND SECURE YOUR PERSONAL INFORMATION?

We store your Personal Information in a number of ways including:

- digitally on site;
- with third party storage providers;
- in hard copy or paper format; and
- in telephone recordings.

We secure your Personal Information in a number of ways, including:

- all hard copy material is secured on NGR premises and at archive sites by locks and security systems;
- all digital material is secured using up-to-date computer and network security systems with appropriate firewalls, encryption technology, virus software, and access Login Names and Passwords or Confirmation Codes;
- any digital transfer of Personal Information is secured using a range of secure methods including but not limited to encryption;
- the use of secure Passwords, Login Names, Confirmation Codes and Security Questions and Answers;
- limiting access to your Personal Information only by you and by those to whom you have authorised access; and
- ensuring all NGR employees and third parties are bound by confidentiality obligations.

NGR uses, or may in the future use, hosting and data storage providers located in Australia. Where appropriate, NGR has agreements with its hosting and data storage providers to keep all Personal Information they store secure, using reasonable and appropriate security measures.

Whilst our website and myNGR rely on the highest levels of technology to ensure maximum security, no data transmission over the internet can be guaranteed to be totally secure.

To assist us in protecting your Personal Information, we expect you to:

- keep confidential your Confirmation Code, Password and Login Name,
- destroy any communication we send to you containing your Confirmation Code, Passwords, Login Names and Security Questions and Answers;
- ensure that you log out properly when you leave your computer and electronic devices such as mobile phones or tablets; and
- take all reasonable steps to ensure security of your Personal Information.

5. WHY DO WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION?

We will only ask for Personal Information relevant to our business relationship with you and for the operation of the Register.

If you do not provide some of your Personal Information, we may not be able to provide you with the services that we are fully capable of providing to you.

We will seek Personal Information from you:

- to operate the Register, myNGR and my eDOCS;
- to register you as a User;
- to create a Grower Account;
- to record any Growers for whom you have authority to act, and the NGR Cards attached to that Grower Account;
- to record those details on the Register or to allow you to record those details on myNGR;
- to provide your Grower Data, Subscription Data and Personal Information to a Buyer and End User, Data Subscriber and their Authorised Users;
- to allow a Data Subscriber to provide NGR Card information and other Grower Data of a Data Subscriber's Grower to another Data Subscriber, with your approval, and in accordance with the Grower and User Terms.
- to assist you with your enquiries or concerns relating to the Register;
- to verify your identity and undertake Grower, User or Data Subscriber due diligence;
- for research, training, product development, risk assessment, risk modelling and marketing requirements; and
- for any other purpose required or authorised by law.

Our use of Personal Information may extend beyond these uses, but will be restricted to purposes that we consider to be related to our functions and activities.

6. DO YOU USE MY INFORMATION FOR DIRECT MARKETING?

We may use your Personal Information to communicate directly with you, and to send you information about products and services offered by us or those provided by Data Subscribers that may be of interest to you.

From time to time NGR may appoint an agent and provide NGR's mailing list to that agent to contact Users with information that could add value to the User's business.

NGR will divulge and make use of the Contact and Identification information for purposes referred to the goods or services NGR and the Data Subscribers provide, for example marketing purposes, administration purposes or as required by law.

Any agent is required to sign a Confidentiality Agreement, preventing disclosure of that information to a third party.

We will provide the mailing list directly to our authorised agent (mailing house) to ensure the security of our Users' Personal Information.

You will always be given the opportunity to opt out of the use of the information for any purposes, including direct marketing.

If you receive direct marketing material from NGR, and do not wish to continue receiving it, please notify us and we will cease direct marketing to you. Where your Personal Information is used or disclosed for direct marketing by us or for the purpose of facilitating direct marketing by a Data Subscriber, you may request the following:

- not to receive direct marketing communications;
- for your information not to be used or disclosed to facilitate direct marketing;
- the source of the information.

If you request that your Personal Information not be used for direct marketing, we will cease direct marketing to you.

You will not be charged for this request and our request will be completed within thirty (30) days of the date of receipt of your request, unless it is impracticable or unreasonable for us to do so.

7. WHAT DO WE DO WITH YOUR PERSONAL INFORMATION?

If we collect Personal Information from you, we may:

- Use that Personal Information for any reason or purpose as per Sections 5, 6 and 7 of this Policy;
- Store that information in accordance with this Policy.

Contact and Identification Information

NGR may provide your Contact and Identification information in accordance with the Grower and User Terms, Data Subscriber Terms, and this Policy, in connection with a transaction with that Data Subscriber. The Data Subscriber may use this information for the following purposes:

- facilitating commercial transactions (for example invoicing) between a Grower for whom you have

- authority to act, their associated NGR Cards and the Data Subscriber;
- allowing a Data Subscriber to provide the information on the face of the NGR Card and the contact number for the User of a Grower, for the purposes of allowing another Data Subscriber to List on the Grower Registration Number and view the Grower's CVD Details or other Subscription Data with your Approval;
 - communicating issues of importance to you and any Grower for whom you have authority to act;
 - preparing statistical information and research;
 - monitoring commercial activity for shareholding purposes; and
 - any other purpose authorised by you.

You will always be given the opportunity to 'opt-out' of the use of the information for any purpose not otherwise related to the provision by the Data Subscriber of goods or services, by contacting the Data Subscriber directly.

Payment and Taxation Information

NGR recognises the sensitive nature of Payment and Taxation Information and undertakes that it will not use or divulge to any third party Payment and Taxation Information other than with your consent pursuant to the Grower and User Terms and Data Subscriber Terms, this Policy or as required by law. NGR may contact the supplier of this Payment and Taxation Information (the User) when necessary on issues relating to the accuracy and currency of myNGR or the Register.

You acknowledge that Grower Data may be provided to a Data Subscriber and its Authorised Users during the financial year or Subscription Period (as the case may be) in which the Data Subscriber has listed on the relevant Grower Registration_Number of a Grower for a variety of reasons, including:

- membership;
- sale;
- transfer; and
- identification purposes.

Payment and Taxation Information may only be used by the Data Subscriber, and its Authorised Users to:

- make payment for the purchase of Agricultural Product;
- provide mandatory returns to the Australian Tax Office or other government bodies as required by law; and
- any other purpose approved by you.

NGR and the Data Subscribers will not use this Payment Information for any purpose which is not related to the goods or services NGR and the Data Subscriber provides to you or for any other purpose for which you would not reasonably expect NGR or the Data Subscriber to use the information. NGR does not rent, sell or release Payment and Taxation Information to third parties (except as stated in Sections 6, 7 and 8 of this Policy).

Voluntary Membership, Donation and Levy Information

Should the recipient of a Voluntary Membership, Donation or Levy preference collected and held on the Register be a Data Subscriber of NGR, NGR may provide them with a NGR Card Number for the purposes of listing onto the NGR secure Data Subscriber interface. The Data Subscriber may use this information to:

- maintain a membership or subscribers register; and
- communicate issues of importance to you.

Combined Harvest Declaration

This includes the specific information relating to a Combined Harvest Declaration completed using our Services. We will supply this information to the relevant participating Data Subscriber and its Authorised Users, where a variety for which the Data Subscriber is managing the royalty collection, is supplied during the Combined Harvest Declaration process. The Data Subscriber and its Authorised Users may use this information for End Point Royalty reconciliation and invoicing if required.

Subscription

This relates to the information collected when you use our Services to complete an electronic form using our electronic document management system known as myeDOCS, powered by myNGR and which forms part of the Register.

In the case of a Commodity Vendor Declaration, where you have indicated a registered Data Subscriber as the Buyer, we will supply the provided Subscription Data to the Data Subscriber and its Authorised Users where they maintain a Listing against the relevant Grower Registration Number.

In the case of an ISCC Declaration, we will supply the provided Subscription Data to any of the registered Data Subscribers and their Authorised Users where they maintain a Listing against the relevant Grower Registration Number.

8. DO WE DISCLOSE YOUR PERSONAL INFORMATION TO THIRD PARTIES?

We may disclose your Personal Information to third parties as part of the operation of the Register and in accordance with the Grower and User Terms, the Data Subscriber Terms and this Privacy Policy.

A Data Subscriber may provide your CVD Details to another Data Subscriber subscribed to, or Listed against the relevant Grower Registration Number, with your Authority.

You consent to us using your Personal Information to operate the Register.

Where your Personal Information is disclosed to third parties, we will require agreement from that third party that the information is held, used or disclosed by that third party consistently with the Australian Privacy Principles and the Privacy Act 1988 (Cth).

Types of third parties include:

- a Document Verification Service Manager or third party engaged by us to provide a Document Verification Service;
- a Data Subscriber subscribed to or Listed against a Grower Registration Number, including a Buyer nominated by you or an End User approved by you;
- parties involved in providing, managing or administering our Services to you including Mail Houses and bulk mail services;
- parties maintaining, reviewing and developing our business systems, procedures and infrastructure including testing or upgrading our computer systems; and
- advisors or agents which may include our legal, tax audit and accountancy advisors.

We may also disclose your Personal Information including Confirmation Code, Login Name, Password and Security Questions and Answers to third parties if compelled by law, where it is necessary in proceedings before a Court or Tribunal or when it can be reasonably inferred from the circumstances that you consent to your Personal Information being disclosed to a third party.

NGR may exchange a Data Subscriber's information (including personal and commercial credit information) with credit agencies to enable NGR to conduct a financial/credit check on the Data Subscriber. NGR uses this information to confirm the Data Subscriber's identity, and to assess the financial viability of the Data Subscriber.

NGR may also exchange this information to collect overdue payments and help the Data Subscriber avoid defaulting on obligations under the Data Subscriber's Terms or this Privacy Policy.

9. DO WE SEND YOUR INFORMATION OVERSEAS?

We do not send your Personal Information outside Australia.

10. CAN YOU ACCESS YOUR PERSONAL INFORMATION OR REQUEST THAT IT BE CORRECTED?

It is your obligation to maintain the quality of your Personal Information by taking reasonable steps to ensure that the information collected, used and disclosed is accurate, complete and up-to-date.

You may request access to your Personal Information at any time by telephoning our Service Centre on 1800 556 630 or online at www.ngr.com.au using your own Login Name and Password.

We may require you to establish your identity prior to providing you with access to your information.

In most cases, we will provide you with access to your information. However, there are some circumstances where we may not give you particular Personal Information, for example, including where provision of information is dependent upon the consent of other persons, if we are unable to verify your identity to our reasonable satisfaction, or where it would otherwise be unlawful to do so or for any other reason notified to you.

If we don't give you your Personal Information, we will tell you the reasons why.

If access is not provided, or is not provided to you in the manner requested, we will take reasonable steps to give access in a way that meets the needs of both you and NGR. This may include the use of a mutually agreed intermediary for provision of access.

If access is not provided, we will provide you written notice that includes:

- the reason for the refusal;
- how you may object to that refusal.

You may also correct and update your information at any time by calling us on 1800 556 630 or on our website or www.ngr.com.au using your own Login Name and Password.

If information is corrected that has previously been disclosed to an external party, we will, on your request, take reasonable steps to notify that external party of the change in information, unless it is impracticable or unlawful to do so.

We may refuse your request to correct information. If we refuse your request to correct information, we will provide to you with notice stating:

- the reason for the refusal, except if it would be unreasonable for us to do so;
- how you may object to that refusal.

If your request to correct information is refused, and you subsequently request us to associate a statement to that information that the information held is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps to associate that statement in such a way that the statement appears to users of that information. Alternatively, we may remove your information from the Register in our discretion.

We will respond to your requests and provide a written statement outlining the reason for the refusal and how you may object to that refusal, within thirty (30) days of receiving your written request for access to or correction of your information, or associating any statements with information we hold about you.

We also conduct an annual data quality verification process with all Users, to confirm the information held is accurate, up to date and complete. We may use your Personal Information to contact you to conduct that annual verification process.

11. DO WE EVER MAKE CHANGES TO OUR PRIVACY POLICY?

From time to time we may need to review our Privacy Policy and make changes to it.

We reserve the right to change our Privacy Policy at any time and to notify you by posting an updated version on our website at www.ngr.com.au.

12. WHAT HAPPENS IF YOU WANT TO DEAL WITH NGR ANONYMOUSLY OR USING A PSEUDONYM?

It is impractical for us to deal with Growers, Users or Data Subscribers who have not identified themselves or have used a pseudonym.

13. WHAT HAPPENS IF YOU HAVE A QUESTION OR COMPLAINT ABOUT HOW WE HAVE HANDLED YOUR PERSONAL INFORMATION?

If you have any concerns or questions about our Privacy Policy, or the way in which we manage your Personal Information, including if you think we have breached the Australian Privacy Principles, you may contact us by:

- sending a letter addressed to the Privacy Officer, National Grower Register Pty Ltd, PO Box 3526, Toowoomba Qld 4350;
- calling NGR on 1800 556 630;
- emailing admin@ngr.com; or
- going to our website www.ngr.com.au and clicking on 'contact us' and completing the details asked of you.

You may also obtain further information about privacy (including general privacy information, answers to frequently asked questions and links to the Australian Privacy Principles) on the Office of the Australian Information Commissioner's website at www.oaic.gov.au.

14. HOW WILL YOUR COMPLAINT BE HANDLED?

While we resolve as many complaints as possible through our Service Centre, complaints regarding privacy are referred directly to NGR's Privacy Officer.

The matter will be investigated by the Privacy Officer and the outcome communicated to you.

The complaint will be acknowledged within five (5) business days of receipt although we will seek to acknowledge the complaint sooner.

The complaint will be investigated and steps taken by us to resolve the complaint within thirty (30) days of receipt of your complaint.

Unless there are exceptional circumstances involved in the resolution process, the Privacy Officer's investigation into the complaint will be completed within forty-five (45) days of receiving the complaint.

If we are unable to resolve your complaint to your satisfaction within forty-five (45) days of receipt, you may be eligible to escalate the complaint to an external dispute resolution service. This may include contacting the Office of the Australian Information Commissioner, details of which may be located on the Office of the Australian Information Commissioner's website at www.oaic.gov.au.

In addition to our complaint handling procedure, complaints regarding the use of Personal Information by any Data Subscriber should be directed to that party. Each Data Subscriber is obliged to have a mechanism in place to deal with complaints regarding the misuse of information on the Register.