



## **PRIVACY POLICY**

This policy outlines the requirements for handling personal information in accordance with the Privacy Act 1988 (Cth).

Approved September 2023

## Document Control

Version #	Reviewed By	Date	Endorsed By	Date	Approved By	Date	Summary of Change
01	GM BOP	July 2020	ARMC	August 2020	Board	September 2020	General update
02	GM BOP	July 2021	ARMC	August 2021	Board	August 2021	Incorporating updates recommended by DA's auditors (RSM) and other general updates
03	CFO	September 2023	ARMC	September 2023	Board	October 2023	Periodic review
<b>Policy Steward</b>							<b>Privacy Compliance Officer</b>
<b>Document Owner</b>							<b>CFO</b>
<b>Related Documents</b>							
Privacy Procedures							
IT Security Policy							
<b>Review Requirements</b>							
This document is next due for review in September 2025 by the Privacy Compliance Officer and CFO							
<b>Controlled Document Location</b>							
<a href="https://dairyaustralia.sharepoint.com/SitePages/documenthub.aspx">https://dairyaustralia.sharepoint.com/SitePages/documenthub.aspx</a>							

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## 1 Overview

This policy applies to all personal information (including sensitive information) collected by Dairy Australia. Dairy Australia understands the importance of protecting the privacy of your personal information. This policy sets out how Dairy Australia aims to protect the privacy of your personal information, your rights in relation to your personal information managed by Dairy Australia and the way Dairy Australia collects, holds, uses, discloses and handles your personal information.

## 2 Your Rights in Relation to Privacy

By providing your personal information to Dairy Australia you consent to Dairy Australia collecting, holding, using, disclosing and otherwise handling your personal information in accordance with this policy. In handling your personal information, Dairy Australia will comply with the *Privacy Act 1988* (Cth) (Privacy Act) and with the 13 Australian Privacy Principles in the Privacy Act.

You are under no obligation to provide your personal information to Dairy Australia. However, without certain information from you, Dairy Australia may not be able to provide its services to you.

We may review, change or update our privacy policy from time to time. Revised versions will be available on our website and any changes will take effect as soon as we publish this, but where we have already collected information about you, we may take additional steps to inform you of any material changes to our privacy policy.

## 3 What Kind of Personal Information Does Dairy Australia Collect?

Generally, the kinds of personal information Dairy Australia may collect includes your name, address, telephone number and email address. In some circumstances Dairy Australia may also hold other personal information provided by you. This may include device information, location information, log on information (whether you access our website, any of our social media platforms or other online forums or links) and other similar information using our application data caches, cookies (as noted below) and/or other browser web storage devices. With respect to staff, Dairy Australia may collect additional information such as tax file number, banking and superannuation details, qualifications, referee reports and performance appraisals, details of paid outside work or directorships and other information relevant to your employment and work-related matters. Sometimes our activities may also require us to collect sensitive information (which is subject to greater restrictions under law), for example, to facilitate your potential employment by Dairy Australia.

If at any time you provide the personal information of another person to us, then you must ensure that that person has read and understood this policy and separately consents to that personal information being collected, held, used, disclosed and otherwise handled by us as described in this policy.

## 4 How Does Dairy Australia Collect Personal Information?

### 4.1 Interactions with you

Dairy Australia may collect your personal information directly from you. This collection may take place in person, through telephone or email correspondence, through the completion of forms, or other communications. There may be other occasions when Dairy Australia collects your personal information from other sources such as from an information services provider or a publicly maintained record.

With respect to job applicants and staff, personal information is often collected from several sources. For instance, you may provide us with information when submitting an application, completing employment forms and when entering data directly into computerised human resources systems. Previous employers and nominated referees, may also provide us with information about your employment history and work-related matters. Generally, Dairy Australia will only collect your personal information from third-party sources if it is unreasonable or impracticable to collect the personal information directly from you.

### 4.2 Software applications and tools

Dairy Australia provides software and online applications and tools which can be used by members of the dairy industry. Unless indicated otherwise in the terms of use for that application or tool, personal information inputted by you when using such application and tool may be collected and used by Dairy Australia in accordance with this policy. Often such collection is necessary to facilitate your use of the application or tool. For example, if you create an account to use such an application or tool.

### 4.3 Cookies

Dairy Australia uses data collection devices such as 'cookies' to monitor usage of its online resources. Cookies are small files placed on your computer's hard drive when you access Dairy Australia's online resources. Cookies provide Dairy Australia with information about your computer's IP address, the date and time of your visit, and the resources or information you have accessed. This information assists Dairy Australia in monitoring and improving how its online resources are being used. In particular, Dairy Australia can use information obtained through cookies to tailor information made available to you and make your visits easier, more productive and more efficient.

While cookies do not generally collect personally identifiable information, in some circumstances they may enable Dairy Australia to identify you. As with any information Dairy Australia collects about you, any personal information obtained through the use of cookies will only be used for the purposes set out in this policy. You will always have the option of disabling cookies through your browser preferences. Please do note, however, that if you disable cookies on your browser, some parts of our online platforms, forums and/or links may not function as effectively, or at all, or may be considerably slower.

### 4.4 Social media

Dairy Australia often uses social media platforms and other interactive online forums through which to communicate and provide its services. Information you disclose to Dairy Australia through such forums may be read, collected and used by Dairy Australia in accordance with this policy. However, it may also be read, collected and used by other users, the actions of whom Dairy Australia cannot control and for whom Dairy Australia takes no responsibility.

You may also access third party websites, forums or links through our website or online resources, which will be subject to their own privacy policies and usage terms. Please refer to the privacy policies and usage terms of any third-party websites or entities for information on their privacy standards and procedures. We are not responsible for the privacy practices or the content of other websites to which any of our online platforms or forums may link or which link to our online platforms or forums.

## 5 Purpose of collection

Dairy Australia collects, holds, uses, discloses and handles your personal information where it is reasonably necessary for the purposes of carrying out its business and operations as the services body for dairy farmers and the dairy industry. This includes:

- undertaking surveys and questionnaires, providing submissions, and participating in information gathering sessions, which relate to the dairy industry, your experience with Dairy Australia and/or products, services and issues related to the dairy industry
- providing educational and awareness information about the dairy industry and dairy products
- distributing, or facilitating the distribution of, industry-relevant publications
- accounting, billing and other internal administrative purposes
- browser and other online information in order to optimise your use of our online platforms or forums and to maintain a record of your activity on our online platforms or forums (including as permitted under paragraph 4.2 (Cookies) above)
- identifying and informing you of resources (including health resources), products, services and/or issues that may be of interest or relevance to you. This may include providing you with information related to the dairy industry or other industries.
- improving promotional and online services
- to facilitate your use of software and online applications and tools provided by Dairy Australia
- any other legal requirements.

**Staff:** With respect to staff, the primary purpose for collecting personal information is to maintain your employee records and to administer your employment, salary and superannuation. Your personal information may also be collected and used for other related human resources processes, data analysis and quality assurance, and in an aggregate (non-identifying) form to report on workforce profiles.

**Job Applicants:** Personal information provided by job applicants is used to facilitate recruitment functions. It is disclosed only to staff and/or relevant panel members involved in the selection process and is treated confidentially. Personal information provided by job applicants may be used to notify them of other future vacant positions at Dairy Australia.

## 6 Who May Dairy Australia Disclose Your Personal Information To?

Dairy Australia may disclose your personal information to third parties for the purpose for which it is collected with your explicit consent or when your consent may reasonably be inferred from the circumstances. This may include disclosing your personal information to third parties engaged to perform administrative, recruitment, promotional, research, information technology or other services (including engaging third parties to store personal information collected by Dairy Australia). This disclosure is always on a confidential basis and subject to agreements prohibiting misuse of the personal information in line with the protections set out in this policy. Dairy Australia may also disclose your personal information to third parties if disclosure is required or authorised by law. With respect to staff, Dairy Australia may also share your information with external bodies

such as the Australian Taxation Office, and other government departments or regulatory authorities, to meet mandatory reporting requirements.

Where personal information is disclosed, Dairy Australia first takes steps reasonable in the circumstances to ensure the personal information is relevant to the purposes for which it is disclosed.

## 7 Overseas Disclosure

Dairy Australia may disclose personal information to overseas recipients for administrative or other business management purposes, including engaging third parties to store personal information collected by Dairy Australia.

Before disclosing any personal information to an overseas recipient, Dairy Australia will take steps reasonable in the circumstances to ensure the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme to the Australian Privacy Principles (unless you consent otherwise to the overseas disclosure or it is otherwise required or permitted by law).

## 8 Opt Out

In the event you do not wish to receive communications about products and services from Dairy Australia, you can opt-out by contacting Dairy Australia's Privacy Compliance Officer via [enquiries@dairyaustralia.com.au](mailto:enquiries@dairyaustralia.com.au) or by calling +61 3 9694 3777 or through any opt-out mechanism contained in a communication. Opting out of receiving such communications will be free of any charge.

## 9 Security of Your Personal Information

Dairy Australia takes all steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss; and from unauthorised access, modification or disclosure. Dairy Australia may hold personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff.

However, as the transmission of information across the internet is not completely secure, we cannot guarantee the security of your personal information provided by email, through our website, through social media interactions or other online forums. Any such transmission is at your own risk.

Dairy Australia will destroy or de-identify personal information in circumstances where it is no longer required for the purposes for which it was collected or for any secondary purpose permitted under the Australian Privacy Principles and the Privacy Act, unless Dairy Australia is otherwise required or authorised by law to retain the information.

## 10 Can You Access and Correct the Personal Information that Dairy Australia Holds About You?

Dairy Australia takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a

right to access and/or seek correction of your personal information that is collected and held by Dairy Australia.

If at any time you would like to access or correct the personal information that Dairy Australia holds about you, or you would like more information on Dairy Australia's approach to privacy, please contact Dairy Australia via the contact details set out in paragraph 11 below. Dairy Australia will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate. You will not be charged for the making of a request to access your personal information or correcting your personal information.

To obtain access to your personal information:

- you will have to provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected; and
- Dairy Australia requests that you be reasonably specific about the information you require.

If Dairy Australia refuses your request to access or correct your personal information, Dairy Australia will provide you with written reasons for the refusal and details of complaint mechanisms. Dairy Australia will also take steps reasonable in the circumstance to endeavour to provide you with access in a manner that meets your needs and the needs of Dairy Australia. In the event that you are dissatisfied with the outcome of your request to access or correct the personal information that Dairy Australia holds about you, you may refer a complaint to the Office of the Australian Information Commissioner ([oaic.gov.au](http://oaic.gov.au)).

## 11 How to Contact Us

For further information or enquiries regarding your personal information held by Dairy Australia please contact Dairy Australia's Privacy Compliance Officer via [enquiries@dairyaustralia.com.au](mailto:enquiries@dairyaustralia.com.au) or by calling +61 39694 3777.

## 12 Privacy Complaints

Please direct all privacy complaints to Dairy Australia's Privacy Compliance Officer. At all times, privacy complaints:

- will be treated seriously
- will be dealt with promptly
- will be dealt with in a confidential manner, and
- will not affect your existing obligations or affect the commercial arrangements between you and Dairy Australia.

Dairy Australia's Privacy Compliance Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation.

In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner ([oaic.gov.au](http://oaic.gov.au)).

## 13 Levy Payer Register

This section applies only to person information provided to Dairy Australia by the Commonwealth Government under section 27A of the Primary Industries Levies and Charges Collection Act 1991 (**PILCC Act**). Irrespective of anything else in this policy, personal

information provided to Dairy Australia by the Commonwealth Government pursuant to section 27A of the PILCC Act may only be used by Dairy Australia in accordance with the permitted uses detailed under the PILCC Act. Accordingly, the Privacy Policy does not apply to such information unless a duplicate version of that personal information has been collected by Dairy Australia by other means. For example, if the discloser has also provided such information to Dairy Australia when becoming a member of Dairy Australia or submitting a form to Dairy Australia.

## 14 Terms and Definitions

Term	Definition
'Dairy Australia', 'we', 'us' or 'our'	Dairy Australia Limited ACN 105 227 987 Level 3, HWT Tower, 40 City Road, Southbank, Victoria 3006
Personal information	<p>The Privacy Act defines personal information as 'information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <ul style="list-style-type: none"> <li>• whether the information or opinion is true or not, and</li> <li>• whether the information or opinion is recorded in a material form or not.'</li> </ul> <p>Essentially, personal information is information that identifies a person or from which an individual could reasonably be identified.</p>
Privacy Act	Privacy Act 1988 (Cth)
Sensitive information	Sensitive information is a sub-category of personal information which is afforded a higher degree of protection under the Privacy Act. Sensitive information includes information about health, criminal records, racial or ethnic origin, trade or professional memberships, political opinion or associations, religious or philosophical beliefs or affiliations, sexual orientation or genetic information.
'you' or 'your'	When we say 'you' or 'your' we mean any individuals about whom we process personal information from time to time including our staff, contractors, members, job applicants, any persons creating an account on our platforms, users of our website or services, individual dairy farmers and all other persons who may provide personal information to us from time to time.