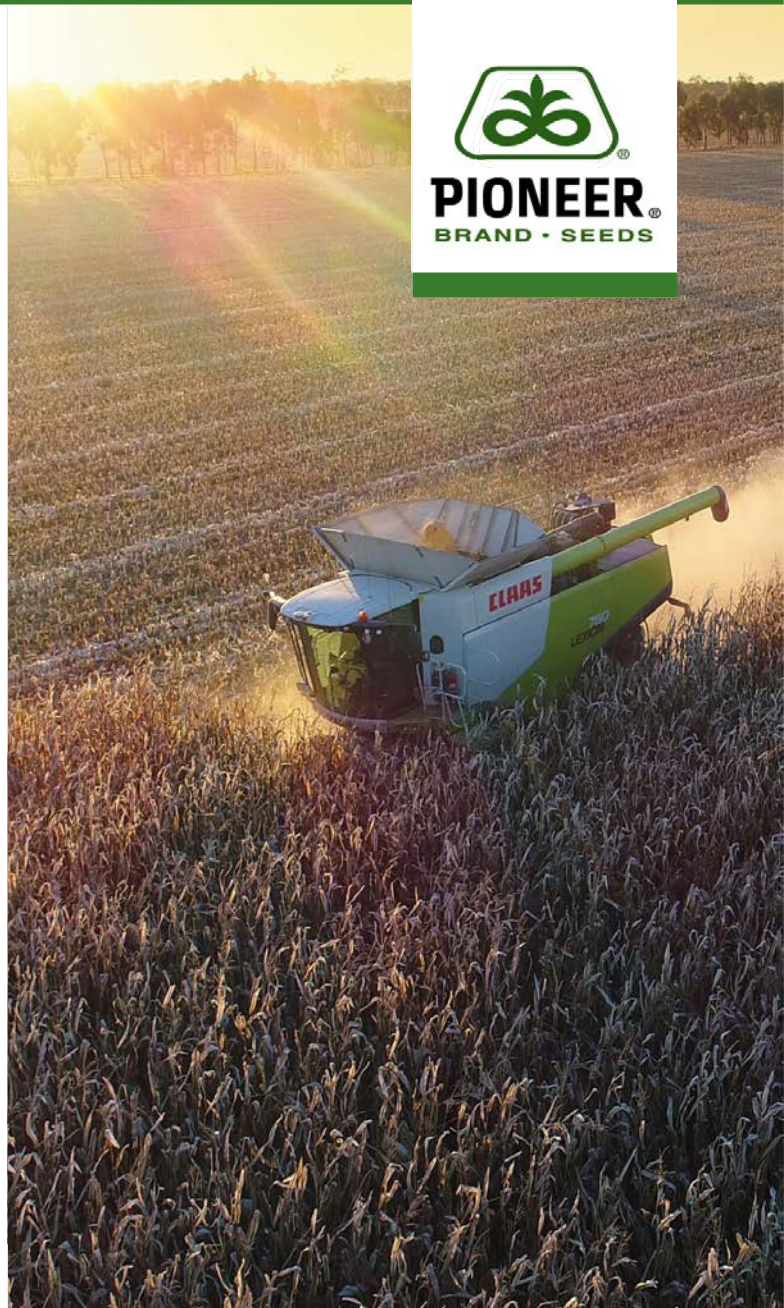


# PRIVACY POLICY



**PIONEER**  
BRAND • SEEDS



WITH YOU  
FROM  
THE WORD  
**GO**



# OUR PRIVACY COMMITMENT

GenTech Seeds is the exclusive producer and supplier of Pioneer® brand canola, corn, grain, sorghum, summer forage hybrid seed and inoculant in Australia.

To do this we need to collect, store, use and disclose a variety of information.

Privacy is important to us. Therefore, we are committed to protecting your privacy by keeping your personal information secure.

We are bound by the Australian Privacy Principles  
(**APPs**) found in the  
*Privacy Act 1988 (Cth)* (**Privacy Act**)



## Our Privacy Policy

Our Privacy Policy explains how and why we collect, use, hold and disclose your personal information. It applies to all business under the control of GenTech Seeds Pty Ltd.

We may need to update this policy in the future. When we do, the updated version will be available on our website (<https://www.pioneerseeds.com.au>). It is your responsibility to review this page from time to time.

Our Privacy Policy may be downloaded in PDF format at: <https://www.pioneerseeds.com.au>.

## What personal information do we collect?

The types of personal information we collect depends on your relationship with us. It differs depending on whether you are a shareholder, customer, supplier, employee, job applicant or referee. It may include sensitive information.

**Customers:** We collect and hold personal information about individuals that may include your name, address, email address, telephone number and the place and type of your business. When assessing a new individual's credit application, we may collect and hold various information about you and your financial position, including credit information, credit eligibility information, and credit references (please see our credit reporting policy for further information). For individuals who are existing customers, we may collect and store your payment history.

**Suppliers:** We collect and hold personal information about individuals that may include your name, address, email address, contact telephone number and information about the goods or services that you supply.

**Job Seekers:** We collect and hold personal information including your name, address, email address, contact telephone number, gender, age, qualifications, employment history, references and details of referees. We may also collect and store other sensitive information.

**Referees:** We collect and hold personal information about you if a job seeker uses you as a referee when applying for a position with us. The information will include your name, contact details, employment position and professional opinion of the candidate.

**Employees:** This can include personal information like your name, date of birth, contact details (including address, email address, phone number or mobile telephone number), occupation, driver's licence number, and financial information (such as your tax file number, bank account number and superannuation fund details).

**NOTE:** The handling of your personal information that is directly related to your current or former employment with us or your employee records (if any) is exempt from the rules of the Privacy Act. That means we do not have to comply with those rules when handling your employee record for something that is directly related to your employment relationship with us.

We do not have to grant you access to your employee record under the Privacy Act.

**Sensitive information:** Examples include information or an opinion about a person's racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, membership of a trade union, sexual orientation, criminal history, health, genetic and biometric information. We will only collect sensitive information where you consent to the collection of the information. Sensitive information is only collected where it is reasonably necessary for one or more of our functions or activities. Under applicable laws, such as the Privacy Act, we are subject to strict requirements in relation to sensitive information.

You might also need to provide personal information about other individuals to us (e.g. about your authorised representatives). If so, we rely on you to have informed those individuals that you are giving their personal information to us and to have advised them about this statement.

## How do we collect your information?

There are four ways that we can collect your information.

### *Directly*

1. You give it to us when you, or your representatives, interact with us. This may be through simple means such as a telephone call, email, through our Company website, an application or a form. It might happen when you set up a customer account with us to buy our products. It may occur when we set you up as a supplier to whom we'll make payments. It may be when you apply for a job with us, when you start or during your employment with us.
2. We collect your information via technology. This may be through lawful surveillance means such as the sign in out register at our sites or security alarm systems.

### *Indirectly*

3. There may be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We collect information from our industry networks. This may be from industry organisations, such as the Australian Fodder Industry Association (AFIA) or Australian Oilseed Federation (AOF). It could be via referrals from other customers, suppliers or employees, with whom you have interacted.
4. We obtain information from outside sources like credit reports, marketing mailing lists, publicly available information (e.g. from the internet or social media sites) and commercially available information. This can also include information gained from our third-party partners if you deal with them. These partners include our commercial partners, credit checking bodies and retail or other customers and suppliers.

We will take reasonable steps to tell you about such collection at or before the time of collection or, if that is not practicable, as soon as practicable after it occurs.

## How do we keep your information?

We may store your information in hard copy or electronic format.

We take all reasonable measures to ensure that your personal information is stored safely to protect it from interference, misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures. We use a combination of the latest industry standard technical solutions, security controls and internal processes to help us protect your information and our internal network from unauthorised access and disclosure.

## How do we use your information?

We may use and disclose your personal information for a wide range of purposes including:

**Business/Service Management** - Your information helps us to ensure our business relationship with you is mutually rewarding. For example, we may need your personal details to provide you with our goods and services, to provide you with information about our goods and services, for verification, payment, billing, payroll purposes, and facilitating our internal business operations. We also need to communicate with you to provide you with a high standard of service that meets your needs. Having your up to date contact information helps us enhance this process for both you and us.

**Credit account:** If you apply for a credit account with us, we use and disclose your personal information to conduct a credit assessment of you, to assess your creditworthiness, and to report on your creditworthiness. Please see our credit reporting policy for further information.

**Research/Improvement** - We're constantly working to maintain and improve our products and services and to develop new ones. We use the information we collect to help us do this in several ways. For example, to monitor the quality of our hybrid seed sold, analysing trends in the market, and analysing the provision of our goods and services and customer needs. Whenever possible, information used for research or improvement purposes is de-identified prior to use.



**Direct Marketing** - We want to make sure that you know about all our products and special offers that are relevant and are of interest to you. So, we may use the information we hold to market and promote them directly to you. We will only use or disclose sensitive information about you for direct marketing purposes if you have consented to that use or disclosure. To opt out of Direct Marketing, see the How to contact us section below.

**Recruitment & Selection** - We review and retain personal information provided by you within a resume, cover letter or email. We gather this information to assess your job application. We do not retain personal information of unsuccessful job applicants for longer than is necessary. Some examples of information collected could include: educational level, qualifications & licensing, work history, experience and referees.

**Employee Management** - We may review and record personal information about you during your employment with us. This information could be in regard to employee engagement, training, safety hazards/ incidents, team and/or supervisor discussions, performance reviews, investigations and end of employment. We may also use your biometric data for the provision of uniforms or promotional gear.

**Compliance** - There are several circumstances where we are required to collect, use or disclose employee information to comply with Australian law. These include collection of information for taxation, superannuation and certification purposes.

## When do we share your information?

We use and disclose personal information about you for the purposes for which it was collected. We may disclose your personal information to:

- our employees or contractors may access your personal information when there is a legitimate work-related purpose to facilitate our internal business processes;
- our related entities or affiliated organisations, to facilitate our and their internal business processes
- service providers, who assist us with providing our products and services and operating our business, such as banking and financial services, professional advisors (including legal services), insurance services, and IT services, and these service providers may not be required to comply with our privacy policy;
- specific third parties authorised by you to receive information held by us;
- the police, national security agency, any relevant authority, or enforcement body if required by law or where we reasonably suspect you have been engaged in any unlawful activity and believe that disclosure is necessary;
- third parties where required by law, binding regulation or court order;
- a purchaser of the assets and operations of our business, if those assets and operations are purchased as a going concern; and
- third parties otherwise with your consent.

**Customers/Suppliers:** In addition to the list above, we may share your information with additional service providers such as transport and shipping providers, and, if you have a credit account with us, we may also disclose your information to credit reporting bodies, other credit providers, and third parties to whom we assign your debt (please see our credit reporting policy for further information). Such service providers may not be required to comply with our privacy policy.

**Shareholders/Employees:** In addition to the list above, we may also disclose your information to:

- your authorised representatives or advisers, or others (e.g. your tax agent, bank, or other credit provider) when you ask us to do so;
- our superannuation clearing house, to enable payment to your superannuation fund;
- others who assist us in managing or developing our business. For example, as an employee, we may give some of your details to a staff training organisation so you can participate in training activities.

## Disclosure of personal information overseas

Our Australian business shares resources (including technical resources such as Salesforce) with Pioneer seeds businesses in other countries, such as New Zealand. Personal Information may be available to those businesses via those shared resources.

We are assisted by a variety of external service providers to deliver our services, some of whom may be located overseas. These third parties are too numerous to list, and they change from time to time. Some examples of the types of third parties include:

- technology service providers including cloud, data, and service providers such as Salesforce located in the US; and
- promotion or marketing service providers, such as Campaign Monitor located in the US.

Wherever possible, we endeavour to impose contractual restrictions at least equivalent to those imposed on us under the Privacy Act in respect of collection and use of personal information by any third parties. In some cases, such as social media networks and third parties with non-negotiable terms and conditions, our ability to impose contractual restrictions is limited. In those circumstances, we endeavour to carefully consider the risks to the protection of personal information when entering into arrangements with third parties.

## Third party privacy practices

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

Some of our services may be integrated with external services, including social media networks. This may mean that information, for instance about your interests and activities, is tracked or pulled from other places (such as Twitter or LinkedIn). If you are signed in to one of our services which is integrated with other media tools, this information may be available to others depending on the privacy settings you have in place on other platforms.







## How can you access or correct your personal information?

It's important that you make sure the personal information we hold for you is accurate, up-to-date and complete. You can access the personal information we hold about you, or ask that your personal information be corrected by written request. If any of your details change, or you would like a copy of your personal information held by us, you can contact our Privacy Officer using the details in the How to contact us section below. We can then consider and respond to your request within a reasonable time. We may charge you a reasonable fee for processing your request (but not for making the request for access).

We may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we will give you a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

If, upon receiving access to your personal information or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

If we refuse to correct your personal information, we will give you a written notice that sets out our reasons for our refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

## How can you make a privacy complaint?

If you wish to make a complaint about a breach of the Privacy Act, the APPs, or a privacy code that applies to us, please lodge your complaint with our Privacy Officer using the contact details found in the How to contact us section, below.

We will acknowledge your complaint in writing as soon as practicable within 7 days. We will aim to investigate and resolve your complaint within 30 days of receiving it. If we need more time, we will notify you about the reasons for the delay and indicate a new estimate time frame.

We hope that we will be able to resolve your complaint without needing to involve third parties. If you are not satisfied with our response, you can lodge a complaint with the Office of the Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)). To lodge a complaint, visit the 'Complaints' section of the OAIC's website to obtain the relevant complaint forms, or contact the OAIC's office.

## How to contact us.

If you have any questions about our Privacy Policy, our management of your information, to get a copy of this statement sent to you, or to lodge a privacy complaint, please contact our Head Office.

Phone: 07 4637 3600

204 Wyreema Rd, LMB 9001, Toowoomba Qld 4350, Australia

[hello@gentechseeds.com](mailto:hello@gentechseeds.com)

**OPTING OUT** – If you do not wish to receive any future Direct Marketing contact from us, you may opt out by leaving a message on our website: <https://www.pioneerseeds.com.au/contact-us>, or through the unsubscribe link found in all direct marketing emails we send.



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BUSINESS**

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