

This is the privacy and credit reporting policy of Beerenberg Pty Ltd ACN 158 498 974 ('Beerenberg'). The purpose of this policy is to ensure that any individual who provides information to Beerenberg is protected under Australian law, in accordance with the *Privacy Act 1988* (Cth) ('Privacy Act').

Beerenberg will be considered a credit provider in relation to providing credit under the Privacy Act when it provides credit terms of more than 7 days to its customers who are sole traders (individuals) or in a partnership. Beerenberg will in such circumstances comply with the *Privacy (Credit Reporting) Code* in relation to the credit.

Words defined in the Privacy Act have the same meaning when used in this policy.

This Privacy Policy (**Policy**) describes how we collect, hold, use and disclose your personal information, and how we maintain the quality and security of your personal information.

What is personal information?

"Personal information" means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g., your name) or indirectly.

What personal information do we collect?

The personal information we collect about you depends on the nature of your dealings with us or what you choose to share with us.

The personal information we collect about you may include:

- Name, gender and date of birth;
- Contact details including address, email address and telephone number;
- If you apply for employment with us, details regarding your employment history, basic medical information relevant to the role, educational qualifications, information derived from background checks, current employment and income details;
- Tax file declarations
- Driver's licence number
- Superannuation details
- Identification document details working visa and licences;
- Bank account or other payment details;
- Credit related personal information;
- Images from video surveillance and marketing purposes;
- Network and device data such as IP address; and
- Other personal information you provide to us.

If we collect your sensitive information, we will do so only with your consent, if it is necessary to prevent a serious and imminent threat to life or health, or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information.

You do not have to provide us with your personal information. Where possible, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you choose to deal with us in this way or choose not to provide us with your personal information, we may not be able to provide you with our services or otherwise interact with you.

How do we collect your personal information?

The way we collect information depends on the nature of the interaction with you. We will usually collect personal information directly from you, for example you may:

- Interact with us over the phone;
- Interact with us in person;
- Participate in surveys or questionnaires;
- Attend a Beerenberg event;
- Apply for a position with us as an employee, contractor or volunteer;
- Access one of our websites;
- Submit a contact form via one of our websites;
- Subscribe to receive communications from us;
- Place an order with us;
- Apply for credit terms with us;
- Share your personal information with the Beerenberg customer services team or other Beerenberg representative;
- Undertake a customer survey or provide feedback; or
- Otherwise communicate with us.
- We may also collect personal information about you from third parties, for example from: publicly available sources AND/OR;
 - Recruitment agencies, referees and pre-employment screening check providers;
 - Your representatives; and
 - Credit reporting bodies.

We collect information when you use our website. Please refer to the website section of this policy for further details. We do not collect sensitive information about you such as your racial or ethnic origin, political opinions, religious beliefs or affiliations.

If there is another person named in any correspondence, you may need to provide their personal information and you warrant that the other person has consented to the collection of their personal information for the reasons it is being collected.

Credit-Related Personal Information

Beerenberg sometimes provides goods and services to customers on credit. In connection with this credit, Beerenberg does in some cases handle certain consumer credit related personal information described below ('credit-related personal information'), including information from credit reporting bodies ('CRBs').

For example, Beerenberg may handle this information in providing credit to sole traders, or where individuals such as directors provide personal guarantees for credit Beerenberg provides to their companies.

We may collect credit-related personal about you such as:

- Name, sex, date of birth, driver's licence number, employer and three most recent addresses;
- Confirmation of previous information requests to CRBs made by other credit providers and credit insurers about the individual;

- Details of previous credit applications, including the amount and type of credit and credit limit;
- Details of current and previous credit arrangements, including credit providers, start/end dates and certain terms and conditions;
- Permitted payment default information, including information about related payment arrangements and subsequent repayment;
- Information about serious credit infringements (e.g., fraud);
- Information about adverse court judgments and insolvency;
- Publicly available information about the individual's credit worthiness;
- Any credit score or credit risk assessment indicating a CRB's or credit provider's analysis of the individual's eligibility for consumer credit

If you do not provide personal information

The main consequence for you, if some or all of the above personal information is not collected by us is that we may not be able to provide goods, services (including on credit) or information to you or be able to provide them to the same standard as if we had the information requested.

Collecting personal information from third parties

We may also collect your personal information from third parties or through publicly available sources.

How do we use your personal information?

Other than as permitted under the Privacy Laws, Beerenberg will only use your personal information for the purpose for which it was collected, which may include:

- to provide products or services to you;
- to administer and manage those services and products including charging, billing, delivery and collecting debts;
- to provide you with information, products or services that you request from us;
- to maintain relationships with suppliers, contractors and other service providers;
- to verify your identity;
- to maintain and update our records;
- to perform our business functions;
- for analytic and statistical purposes;
- to monitor our sales of products and services and for quality control purposes;
- to monitor and measure the use of our websites or apps;
- to undertake product recalls or withdrawals;
- to assess credit worthiness and provide credit;
- to provide information to and communicate with our shareholders;
- to comply with legal obligations and protect our lawful interests;
- to assist us in ensuring security, health and safety and customer protection in our stores; and
- any other purpose made known to you at the point of collection.

Disclosure of personal information to third parties

We may disclose your personal information to companies within the Beerenberg Group, third parties engaged by Beerenberg and our business partners who assist us to perform our business functions including providing information, goods or services to you. We may disclose to:

- our employees, consultants, temporary workers or other representatives;
- payment processors;
- logistics providers;
- professional advisers such as bankers, solicitors, business advisors and auditors;
- service providers who provide operational services to Beerenberg or who help provide our services to you, such as accounting, consumer analysis, archiving, cloud storage and processing, debt collection, data processing and data analysis, information broking, insurance, marketing and consumer analysis, telecommunications, research, fraud detection and monitoring, website, information technology or other relevant services;
- credit reporting bodies;
- government agencies or regulatory bodies;
- third parties in connection with the sale or some or all of our business; and
- any other party whom you authorise us to disclose your personal information to.

We may also disclose your personal information to comply with legislative and regulatory requirements or in connection with law enforcement requirements or as otherwise required or permitted by law.

Beerenberg may use Veda, PO Box 964 North Sydney 2059, www.mycreditfile.com.au, 1300 762 207 as a CRB.

Transfer of personal information overseas

Some of the third-party service providers we disclose personal information to may be based in or have servers located outside of Australia.

Where we disclose your personal information to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained. We will only disclose to overseas third parties if:

- you have given us your consent to disclose personal information to that third party; or
- we reasonably believe that:
 - The overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the APPs; and
 - the law or binding scheme can be enforced; or
- the disclosure is required or authorised by an Australian law or court / tribunal order.

How do we protect your personal information?

Beerenberg will take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by:

- having a robust physical security of our premises and databases / records;
- taking measures to restrict access to only personnel who need that personal information to effectively provide services to you;
- having technological measures in place (for example, anti-virus software, fire walls);

Online activity

Cookies

The Beerenberg website uses cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise when your device has visited our

website(s) before, so we can distinguish you from other users of the website. This improves your experience and the Beerenberg website(s).

We do not use cookies to identify you, just to improve your experience on our website(s). If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

Website analytics

Our website uses Google analytics to help us better understand visitor traffic, so we can improve our services. Although this data is mostly anonymous, it is possible that under certain circumstances, we may connect it to you.

Direct marketing

We may send you direct marketing communications and information about our services, opportunities, or events that we consider may be of interest to you if you have requested or consented to receive such communications.

These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Australian Spam Act 2003* (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt-out of receiving marketing communications from us at any time by following the instructions to "unsubscribe" set out in the relevant communication contacting us using the details set out in the "How to contact us" section below.

For complaints about how Beerenberg handles, processes or manages your personal information, please contact Beerenberg's privacy officer. Note we may require proof of your identity and full details of your request before we can process your complaint.

Please allow up to 30 days for Beerenberg to respond to your complaint. It will not always be possible to resolve a complaint to everyone's satisfaction. If you are not satisfied with Beerenberg's response to a complaint, you have the right to contact the Office of Australian Information Commissioner (at www.oaic.gov.au/) to lodge a complaint.

How to contact us

If you have a question or concern in relation to our handling of your personal information or this Policy, you can contact us for assistance as follows:

Email

compliance@beerenberg.com.au

Contact number

08 8388 7272

Post

Attention: Beerenberg Privacy Officer
Address: PO box 240 Hahndorf, South Australia 5245