

Privacy Policy

Lark Distilling Co. Ltd

ACN 104 600 544

Reviewed/Approved by the Board	
Adopted	25 November 2019
Reviewed & Approved	26 November 2020

1. Purpose

- 1.1 Lark Distilling Co. Ltd ACN 104 600 544 (**Company**) and its subsidiary companies (collectively, the **Group**) recognises the importance of privacy and is committed to protecting your privacy when handling your personal information. This Privacy Policy explains how the Company and Group will collect, hold, use, disclose, protect and otherwise handle your personal information in accordance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth).

2. What is personal information?

- 2.1 Personal information is information or an opinion about you from which you can be reasonably identified.

3. Why does the Group collect personal information?

- 3.1 The Group collects personal information so that it can administer your investment in the Company, provide facilities and services that you request and comply with its legal obligations. If the Company or Group does not collect your personal information, it may not be able to provide you with these services.

4. What personal information does the Group collect?

- 4.1 In the course of administering your investment and providing you with associated products and services the Company and Group may collect and hold the following personal information about you:
- (a) your name;
 - (b) address and other contact details;
 - (c) date of birth;
 - (d) tax file number (**TFN**); and
 - (e) banking details.
- 4.2 Generally, the Group will not collect sensitive information about you (such as your race or ethnic origin, political beliefs or religion). If the Group needs sensitive information, it will ask your consent when it collects this information and comply with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth).

5. How does the Group collect your personal information?

Collecting information from you

- 5.1 How the Group collects your personal information will largely depend on whose information it is collecting. If it is reasonable and practicable to do so, the Group will collect personal information directly from you.
- 5.2 Depending on how you choose to interact with the Group, the Group may collect your personal information when you contact the Group or its service providers by telephone, by email, through the Group's websites or when you complete a form or document and provide it to the Group.

Collecting information from third parties

- 5.3 The Group may also collect information about you from other people (e.g. a third party administrator) or independent sources. For example, the Group may collect personal information about you from its services providers, including the Company's share registry, Boardroom Pty Ltd. However, the Group will only do so where it is not reasonable and practicable to collect the information from you directly. Where the Group has collected your information from a third party, such personal information will be held, used and disclosed by the Group in accordance with this Privacy Policy.
- 5.4 When you provide the Group with personal information you consent to the use, disclosure and handling of your personal information in accordance with this Privacy Policy and any subsequent amendments.

Collecting information from visits to the Group's websites

- 5.5 The Company and Group may collect information based on how you use their websites including through 'cookies', web beacons and other similar technologies. Cookies are small text files that websites or apps may place on your computer or device and collect non identified/anonymous information about the users of its website such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to the website.
- 5.6 The Group uses cookies to provide you with a more consistent experience across our services and reserves the right to ask advertisers or other partners to serve ads or services to your devices, which may use cookies or similar technologies placed by us or the third party. This information is collected to analyse and improve the Group's websites, its marketing campaigns and to record statistics on web traffic.
- 5.7 No attempt is made by the Group to use this information to personally identify you. We record a variety of information from interactions with our online services including IP address, locations data (where available and not disabled by the user), dates, times, and other user activity. In most cases we will not be able to reasonably identify an individual from the information collected. However, if cookie information is linked with personal information we hold about you as set out above, this cookie information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.
- 5.8 You can remove or reject cookies by adjusting the settings on your web browser.

Unsolicited information

- 5.9 If the Group receives personal information that it has not requested, or it determines that the personal information received is not reasonably necessary to provide its services, the Group will take reasonable steps to de-identify or destroy that personal information.

6. How does the Group hold your personal information?

Storage and security of your personal information

- 6.1 The security of your personal information is of paramount importance to the Group and it takes reasonable steps to protect the personal information it holds about you from misuse, loss, unauthorised access, modification or disclosure. The Group has a number of safeguards in place to protect the personal information we hold, including password protected databases, staff training and system firewalls. The Group maintains password security and restricted access to all electronic documents containing personal information and stores hard copy documents in secured locations.

- 6.2 The Group will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for the purpose for which the information was used or disclosed.

7. How does the Group use your personal information?

- 7.1 The Group may hold, use or disclose your personal information so that it can administer your investment in the Company and provide facilities and services that you request.
- 7.2 The Group may also collect, hold, use or disclose your personal information to:
- (a) consider any concern or complaint that you raise against the Group or to manage any legal action between you and the Group;
 - (b) prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
 - (c) identify you or establish your tax status under any Australian or foreign legislation; or
 - (d) comply with any relevant laws, regulations, codes or practice and court orders.
- 7.3 The Group may also use your personal information to identify a product or service that may be of interest to you. If at any time you no longer wish to be notified about other services or promotions, please unsubscribe by using the opt out link in the communication or contact the Group via the privacy specific contact details provided at the end of this Privacy Policy.

8. How is personal information disclosed to others?

- 8.1 The Group does not sell, rent or trade personal information to, or with, third parties.
- 8.2 The Group's websites may contain links to other websites. The Group does not share your personal information with those websites and it is not responsible for their privacy practices.
- 8.3 In some circumstances your personal information may be disclosed to service providers that perform a range of services on behalf of the Group including:
- (a) mailing houses and printing companies;
 - (b) auditors and solicitors;
 - (c) registry providers (including Computershare Limited);
 - (d) information technology vendors; and
 - (e) other consultants.
- 8.4 Personal information may be disclosed to third parties in Australia and overseas.
- 8.5 If the Group transmits your personal information over the internet (for example to third parties who hold data outside Australia) we will take reasonable steps to maintain the security of any personal information to prevent misuse and unauthorised access. Despite these protection mechanisms, you should be aware there are inherent risks associated with the transmission of data over the internet and we cannot guarantee any transmission will be completely secure.
- 8.6 Where the Group discloses your personal information to its service providers, it will take steps to ensure that they are authorised to only use personal information in order to perform the functions required by the Group and in accordance with the Privacy Act 1988 (Cth).
- 8.7 The Group may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements. In particular, the

Corporations Act 2001 (Cth) requires certain information about you to be included in the Company's registers which are able to be accessed by the public.

9. How you may access or correct your personal information

- 9.1 You may contact the Group to request access to the personal information that it holds about you at any time. You may also ask the Group to correct information about you that you may believe is inaccurate, incomplete or out of date.
- 9.2 Please contact the Group using the contact details below if any of the personal information that the Group holds about you is not correct or complete, or if you wish to request access to the personal information which the Group holds about you. The Group will need to verify your identity before giving you access to, or correct, your personal information.
- 9.3 In certain circumstances, the Group may not be able to correct or provide you with access to your personal information. In these circumstances, the Group will write to you to explain and provide the reasons why.

10. How you may complain if you have concerns about how the Group has managed your personal information

- 10.1 If you have a complaint related to how the Group has managed your personal information, please contact the Group using the contact information below. The Group may ask you to place your concerns in writing in order for it to fully understand and investigate the issues you have raised. We will endeavour to respond to your request within 30 days. All such complaints will be handled with the appropriate discretion.
- 10.2 If a complaint remains unresolved, you may access an external dispute resolution service or apply to the Office of the Australian Information Commissioner (**OAIC**) at www.oaic.gov.au to have the complaint heard and determined.
- 10.3 Further information on the Act and the Australian Privacy Principles, can be found at www.privacy.gov.au.

11. How to contact us

- 11.1 If you have any questions about this Privacy Policy, if you wish to complain about how the Group handled personal information about you or if you wish to access or correct your personal information, please contact the Company Secretary on:

Tel: +61 3 6231 9088
Mail: Lark Distilling Co. Ltd
Level 1, 30 Argyle Street
Hobart TAS 7000
Australia

12. Changes to this privacy policy and information handling practices

- 12.1 This Privacy Policy is subject to change at any time. If the policy changes an updated version will be posted on the Company's website to notify you on this change. Please check the Privacy Policy on its

website <https://larkdistillery.com/> regularly for any changes. By continuing to use the Group's services you will be deemed to have accepted any changes to its Privacy Policy.