## **PRIVACY POLICY**

McCORMICK Foods Australia Pty. Ltd. (ABN 62 004 763 259) recognises the importance of safeguarding your personal information, in compliance with the Australian Privacy Principles established under the Commonwealth Privacy Act 1988 ("the Act").

We will collect, disclose, handle and use personal information as described in this privacy policy, as authorised by you and/or as required or authorised by law. By providing your personal information to us, you consent to the collection, use, transfer and disclosure of your information under the terms of this privacy policy.

We reserve the right to update this privacy policy from time to time. Any changes we may make to our privacy policy in the future will be posted on this website.

### **Collection of Personal Information**

We treat information as personal information if an individual person can be reasonably identified from that information. We will usually collect your personal information directly from you wherever it is reasonable and practicable to do so in the circumstances.

We usually collect personal information in the following ways:

- From users of our websites;
- From users of our consumer services (online, via phone, in person, via mail or any other method);
- From your dealings with us, including orders, employment applications and enquiries;
- If you enter or complete one of our competitions, offers, surveys or trade incentives;
- If you subscribe to our product electronic mailing lists; and
- If you are a member of our consumer advisory group/s.

The types of information we collect will depend on the nature of our relationship with you and may include, but is not limited to:

- name and contact details (including but not limited to your postal address, email address and phone numbers);
- demographic information (including but not limited to your age, gender, State or Territory of residence, occupation);
- product preferences, usage, attitudes and behaviour; and
- other information about your dealings with us.

You do not need to give us personal information, but if you don't, we may not be able to help you or provide you with the requested services/products or allow you to participate in an advertised activity.

## **Sensitive Information**

As a general rule we do not usually collect sensitive information. If you do provide sensitive information to us for any reason (for example, if you provide us with information about your allergies, dietary requirements or other health related information), you consent to us

collecting that information and to us using and disclosing that information for the reason that you provided it to us and as permitted by the Act.

## **Use of Personal Information**

Generally, we will only use and disclose the personal information that we collect about you so that we can do business together and for purposes connected with our business operations. How exactly we use your personal information will therefore depend on the nature of your relationship with us and the primary purpose of collection, and may include the following:

- to verifying your identity;
- to facilitate your entry and participation in competitions, promotions, offers, surveys and trade incentive programs;
- to assess your suitability for a working relationship with us;
- to improve our products or services;
- to customise your experience when using our websites, products or services;
- to provide goods or services to you or receive goods or services from you;
- to address any issues or complaints that we or you have regarding our relationship;
- to facilitate any questions or requests you may have;
- to develop and improve our business;
- to provide you with further details about our business and the products, services or activities you have expressed an interest in and/or to let you know about news, products, services or activities that we think may be of interest to you; and
- to ensure that content from our websites is presented in the most effective manner for you and for your device.

We may contact you in relation to the above via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

## **Disclosure of Personal Information**

We will only disclose your personal information to the extent it is necessary, appropriate, or helpful to conduct and administer our business and activities or facilitate our dealings with you. In this respect, the types of individuals or entities to which we may disclose your personal information include the following:

- our staff or employees;
- related partner companies and third party service providers including: our related companies; our distributors and contractors (such as mailing houses, prize providers, marketing agencies, insurance providers, website and data hosting providers and other IT suppliers) and others persons who provide services to us;
- our accountants, insurers, lawyers, auditors and other professional advisers;
- owners of trade marks who grant us a licence to use those trade marks;
- in the event that we or our assets are or may be acquired by a third party, that third party and their advisors;
- in certain circumstances, third parties that require the information for law enforcement or to prevent a serious threat to public safety; and
- as otherwise permitted or required by law.

McCORMICK Foods Australia Pty. Ltd. has related companies in a number of different countries, including the United States of America, and as part of our internal administration and reporting purposes or to the extent it is necessary, appropriate, or helpful to conduct and

administer our business and activities or facilitate our dealings with you, your personal information may be shared with those related companies. Unless otherwise advised, we will only share your personal information outside of Australia for these limited purposes. We make every reasonable effort to ensure data security and appropriate privacy practices are maintained by our related overseas entities with whom we share personal information.

As a matter of policy, we do not sell or rent any of your personal information to third parties for their marketing purposes without your explicit consent.

Wherever we disclose your personal information to third parties we will use reasonable commercial efforts to ensure that such third parties protect your personal information in a manner consistent with this privacy policy.

#### Cookies

A Cookie is a piece of information that our web server may send to your machine when you visit our websites. The Cookie is stored on your machine and may allow collection of log files about your visit to our websites and your IP address. Among other things, Cookies help us to recognise you when you re-visit our websites and to co-ordinate your access to different pages on the websites.

Selected third parties may also send your machine Cookies when you visit our websites, however, any data collected by such third party Cookies will be non-personally identifiable.

With most Internet Browsers, you can erase Cookies from your computer hard drive, block all Cookies, or receive a warning before a Cookie is stored. If you want to do this, refer to your Browser instructions or help screen to learn more. Keep in mind that, if you do this, you may not be able to access all features of our websites.

### Links to other sites

We may provide links to other websites on our websites. If you use these links, you will leave our website and we are not responsible for any of these websites, or their usage of your personal information. We recommend that you check the privacy policies on those websites.

## **Quality and Security**

We take all reasonable steps to ensure the security of personal information we hold. We try to ensure that personal information we collect, disclose and use is complete and accurate. We destroy or de-identify personal information when it is no longer needed.

We may store personal information on computer databases and/or in hard copy at our offices, and we employ reasonable commercial physical and electronic security measures to protect any records that we hold which contain your personal information. We may also engage third party service providers to assist in storing and processing certain types of personal information for us.

We take all reasonable steps to protect your personal information from misuse and loss and from unauthorised access, interference, modification or disclosure in accordance with the requirements of our privacy policy and the Act.

# Access, Correction and Opting Out

You can always opt out of receiving any marketing material via electronic mail from us by

following the instructions in the relevant electronic mail to unsubscribe.

You also have a right to access and seek correction of the personal information we hold about you. You can do so by calling us on 1800 802 223 or by writing to us at McCormick Foods Australia, Private Bag 3, Clayton South Victoria 3169, Australia.

We will require suitable proof of identity from you before we can grant access or make the requested changes. In general, we will allow access to the personal information we hold about you, however, we may deny access to you to the extent that providing access would pose a serious threat to the life or health of any individual, or providing access would have an unreasonable impact upon the privacy of other individuals, or it is otherwise appropriate for us to deny access in accordance with the Act.

If we agree, we will make any changes you request. If we don't agree to make changes, we will provide you with the reasons for our decision.

# **Concerns or Complaints**

If you have a concern or complaint in relation to our handling of your personal information or you believe that we have breached the Australian Privacy Principles or any other applicable privacy laws or codes, you can contact us by calling us on 1800 802 223 or by writing to us at McCormick Foods Australia, Private Bag 3, Clayton South Victoria 3169, Australia. We will investigate your concerns and will respond to you in writing (usually within 14 working days).

Last Updated: [20 June 2014.]