

## PRIVACY POLICY

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### 1.0 Policy Purpose and Objectives

The Carter Holt Harvey group of companies (**'the company', 'we', 'us' or 'our'**) is committed to protecting your privacy and Personal Information when you deal with us and ensuring that it collects, stores and deals with your Personal Information appropriately and lawfully, including in accordance with the relevant privacy legislation.

The Privacy Act 1988 (Cth) (as amended) (**'Australian Privacy Act'**) applies to the collection of personal information by Carter Holt Harvey's Australian entities. The New Zealand Privacy Act 1993 (as amended) (**'New Zealand Privacy Act'**) applies to the collection of personal information by Carter Holt Harvey's New Zealand entities.

### 2.0 Coverage

This policy applies to all Personal Information collected by the company in relation to its employees, customers, suppliers and other third parties (**'you'**). In this policy, we outline:

- what types of Personal Information we collect and hold;
- the purposes for which we collect, hold, use and disclose Personal Information;
- how we collect Personal Information;
- how you may access your Personal Information that we hold and seek any correction to that information;
- how you are entitled to complain about a breach of this policy or any relevant law;
- how we disclose Personal Information; and
- if we are likely to disclose Personal Information to overseas recipients and if so, to which countries.

### 3.0 Personal Information

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Personal Information is information or an 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, or as defined in the relevant Privacy Act (**'Personal Information'**).

#### 3.1 Types of Personal Information We Collect and Hold

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The types of Personal Information we may collect from you and hold include (without limitation):

- Name, address and contact details;
- Date of birth;
- Drivers Licence details;
- Financial details including annual earnings, bank account details and trade reference details;
- Details of the products and service provided; and
- Credit history information.

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### 3.2 Purpose of Collecting, Holding or Using Personal Information

Your Personal Information will be used for the stated purpose for which it was collected. The company collects, holds, discloses and uses your Personal Information:

- to provide you with products and services;
- to administer our relationship with you including responding to queries;
- to process any job application submitted by you and to establish a contract of employment;
- for internal administrative purposes, such as but not limited to procedural assessment, risk management, staff training, accounting, billing, product and service reviews;
- to determine the provision of credit in accordance with the terms of our Application For Commercial Credit;
- to assess or exchange information relating to your creditworthiness, credit history or credit capacity in accordance with the terms of our Application For Commercial Credit;
- to assist in the collection of overdue payments;
- to comply with legislative requirements such as under the Personal Property and Securities Act 2009 (Cth);
- to monitor activity on our websites;
- to identify and inform you about other products or services that may be of interest to you; and
- to provide you with information about products, services and offerings that may be of interest to you.

Section 3.5 of this policy sets out the other parties to which we may disclose personal information.

By submitting your Personal Information to the company, you consent to us using your Personal Information in the above ways and for any other purpose disclosed to you at the time of collecting the Personal Information.

### 3.3 Collection of Personal Information

The company collects Personal Information directly from an individual unless it is unreasonable or impracticable to do so (in accordance with the relevant Privacy Act). The company may also collect such information from other sources, including:

- Other related entities to the company;
- Credit providers and credit reporting bodies; and
- Publicly available sources of information.

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### 3.4 Access to and Correction of Personal Information

In most cases, you can gain access to Personal Information about you held by the company. Australia's National Privacy Principles (and, from 12 March 2014, the Australian Privacy Principles) under the Australian Privacy Act and the New Zealand Privacy Act set out some circumstances in which we are not required to provide you with such access. For example, we are not required to give access where we reasonably believe that giving access to the Personal Information would pose a serious threat to the life, health or safety of any individual, or to public health or public safety.

To make a request to access your Personal Information held by the company, contact the Privacy Officer in any of the ways set out in section 8.0 of this policy.

The company takes reasonable steps to ensure that the Personal Information we collect, use or disclose is accurate, complete and up to date, relevant, and not misleading. If your Personal Information is incorrect or changes, please contact the Privacy Officer in any of the ways set out in section 8.0 of this policy. If we refuse your request, reasons will be provided as to why this is the case.

### 3.5 Use and Disclosure

The company understands the importance of keeping Personal Information private, and will only disclose such information to others in limited circumstances. Other parties to which the company may disclose Personal Information include:

- credit providers and credit reporting bodies in accordance with the terms of our Application For Commercial Credit;
- the company's professional advisers;
- government and regulatory authorities; and
- our related entities

in connection with (or for reasons directly related to) any of the purposes set out at section 3.2 of this policy.

The company also discloses Personal Information to contractors (such as IT service providers) who provide services to us or who manage services provided to an individual on the company's behalf. Personal Information is only disclosed to contractors to the extent necessary to enable them to provide these services.

In Australia, Carter Holt's Australian entities may also be permitted or obligated to disclose Personal Information to other third parties where:

- the company reasonably believes that the disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety and it is unreasonable or impracticable to obtain your consent to the disclosure;
- there is reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the company's functions or activities has been, is being or may be engaged in, and the company reasonably believes that the disclosure is necessary for us to take appropriate action in relation to this matter;
- the company is required or authorised to do so by law;
- the company is required to do so by an enforcement body; or

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- as otherwise permitted by the Australian Privacy Act.

In New Zealand, Carter Holt's New Zealand entities may also be required to disclose Personal Information to other third parties where the company reasonably believes that disclosure is necessary:

- to prevent or lessen a serious and imminent threat to public health or safety, or the life or health of the individual concerned or another individual;
- to avoid prejudice to the maintenance of the law by any public sector agency;
- for the purposes of law enforcement;
- for the protection of the public revenue;
- for the conduct of proceedings before any court or tribunal (being proceedings that have been commenced or are reasonably in contemplation); or
- as otherwise permitted by the New Zealand Privacy Act.

### 3.6 Disclosure to overseas recipients

The company is unlikely to disclose your Personal Information to overseas recipients except to our related companies in Australia or New Zealand. The company will not disclose your Personal Information outside of the country the information was collected from (except to our Australian or New Zealand related companies) unless we first obtain your consent

### 3.7 Retention and destruction of Personal Information

Once an individual's information is no longer needed by the company, reasonable steps are taken to destroy or de-identify it (except where archiving is required for the purposes for which the information was collected).

### 3.8 Security

The company maintains procedures and standards and takes reasonable steps to prevent unauthorised access to, use, modification, or disclosure of, Personal Information. The company takes reasonable steps to protect an individual's information from misuse, interference or loss by implementing physical, technical and administrative security standards to secure and protect Personal Information. Steps we take can include, but are not limited to, implementing and imposing new measures in line with market practice, such as:

- the use of firewalls, anti-virus software and ongoing internal monitoring;
- confidentiality requirements on our employees and other representatives, as well as third parties;
- policies on document storage security;
- security measures for access to our systems;
- identification procedures prior to providing access to information;
- control on access to our premises; and
- website protection security measures.

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### 4.0 Sensitive Information

Some information is classed as "Sensitive Information". This includes information or an opinion about a person's racial or ethnic origin, political opinions, philosophical or religious beliefs or affiliations, membership of a political, trade or professional association or trade union, sexual preferences or practices, criminal record, health or genetic information, biometric information that is used for the purpose of biometric verification or identification, or biometric templates.

The company will only collect, hold or disclose Sensitive Information if:

- the individual has consented; or
- the collection is required or authorised by or under law (including the relevant Privacy Act) or a court/tribunal order.

### 5.0 Complaints

If you have a complaint in relation to the collection and handling of your Personal Information, please contact the company's Privacy Officer via any method set out in section 8.0 of this policy. All complaints will be dealt confidentially and investigated internally. In Australia, a response will be provided within 30 days unless otherwise specified (in accordance with the Australian Privacy Act).

### 6.0 Updates to this Policy

This policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. The latest version of this policy will be the version posted to our website. We reserve the right to amend this policy from time to time.

### 7.0 Credit Reporting Policy

Our Commercial Credit Reporting Policy sets out the details on how we manage your credit information and credit reporting information and can be viewed there.

### 8.0 Contact Us

If you have any queries about this Policy, or wish to request access to (or correction of) your personal information, please contact the company's Privacy Officer at:

Carter Holt Harvey

Private Bag 92-106

Auckland 1142

Ph: (+64 9) 633 0600

Fax: (+64 9) 633 0601

Email: [privacyofficer@chh.co.nz](mailto:privacyofficer@chh.co.nz)

Approved



**Denver Simpson**  
General Counsel